

STERLING BPO SOLUTIONS PVT LTD

Code of Conduct

Guiding Principles for Ethical Business Practices and Corporate Responsibility



This document sets forth the guiding principles of Sterling BPO Solutions Pvt Ltd., reflecting our commitment to integrity, professionalism, and respect. These principles align with our core values and are mandatory for all employees, subcontractors, and affiliates, fostering a culture of excellence and responsible conduct.

Sterling BPO Solutions Pvt Ltd.

Code of Conduct

Introduction

Objective:

The Code of Conduct for Sterling BPO Solutions is designed to embody our organisation's principles and values. The objective is to provide a framework for ethical decision-making and to promote a culture of integrity, respect, transparency, and excellence. It guides our professional behaviour, ensuring all interactions are conducted with the highest ethical standards.

Scope:

This Code of Conduct applies to all employees, contractors, consultants, and other stakeholders engaged with Sterling BPO Solutions, regardless of location, position, or function. It extends to all business activities, dealings, and relationships with clients, vendors, partners, and other stakeholders.

Code of Conduct Monitoring Procedure:

Compliance with this Code is an ongoing responsibility of all those within its scope. The Compliance Manager conducts monitoring of adherence to the Code and involves:

- Regular assessments and audits to ensure alignment with the Code's provisions.
- Provision of training and awareness programs to enhance understanding and commitment.
- We are encouraging open communication and reporting of concerns or potential violations.

Non-compliance will be dealt with promptly and may result in disciplinary action, depending on the nature and severity of the violation.

Reviewing Procedure:

The Code of Conduct will be reviewed periodically to ensure it remains relevant, effective, and aligned with the current legal and regulatory environment, industry standards, and organisational values. The review process includes:

- Evaluation of the effectiveness of the Code in guiding ethical behaviour and decision-making.
- Analysis of any reported violations and lessons learned to identify areas for improvement.
- Consider changes in laws, regulations, industry practices, and organisational objectives that may necessitate revisions to the Code.
- Involvement of stakeholders, including employees and management, in providing feedback and suggestions.

Principals

The provisions outlined in this Code of Conduct provide the minimum standards expected of all individuals and entities associated with Sterling BPO Solutions Pvt Ltd. We expect adherence to the spirit of this Code of Conduct, in line with the core principles of the International Labour Organization (ILO) Conventions, applicable local and global regulations, and industry best practices.

Sterling BPO Solutions recognises the standards in this Code as part of a dynamic and continuous process, encouraging all to strive for excellence and adhere to or exceed these standards on both corporate and social levels.

All principles in this Code of Conduct are equally important, regardless of their order. Sterling BPO Solutions expects all employees, suppliers, contractors, and affiliates to understand that compliance with this Code is mandatory and essential for maintaining a professional relationship with our organisation.

The principles of this code shall apply to Sterling BPO Solutions, its parent, subsidiary or affiliate entities, and all others with whom we do business, including employees,

subcontractors, suppliers, and other third parties. Sterling BPO Solutions expects its partners to encourage and work with their networks to ensure adherence to the principles of this Code or an equivalent set of principles, including but not limited to the following:

1. Integrity and Ethical Conduct

We uphold the highest standards of honesty and ethics in all business dealings.

2. Compliance with Laws and Regulations

We adhere to all applicable local, national, and international laws and regulations.

3. Respect and Fair Treatment

We treat all individuals with dignity, respect their rights, and promote diversity and inclusion.

4. Environmental Sustainability

We are committing to responsible environmental practices and sustainability initiatives.

5. Health and Safety

We prioritise the well-being and safety of employees, customers, and the community.

6. Transparency and Accountability

We ensure openness in all business practices and accountability for actions and decisions.

7. Confidentiality and Privacy

We protect the confidential and personal information of clients, employees, and partners.

8. Continuous Improvement and Innovation

We are encouraging innovation and continuous improvement in all aspects of business.

9. **Social Responsibility**

We are contributing positively to the community and society and upholding human rights.

10. **Fair Competition and Anti-Corruption**

We are promoting fair competition and actively preventing all forms of corruption.

11. **Supplier and Partner Relationships**

We are building and maintaining respectful and mutually beneficial relationships with suppliers and partners.

This Code of Conduct reflects the vision, mission, and values of Sterling BPO Solutions Pvt Ltd and aligns with international standards and conventions. Compliance with this Code is a legal and moral obligation for all Sterling BPO Solutions associates. Breaches of this Code may result in appropriate disciplinary action.

For further information, clarification, or to report any concerns or breaches of this Code, please contact the Head of Compliance (info@sterlinglanka.com) at Sterling BPO Solutions Pvt Ltd.

Sterling BPO Solutions Pvt Ltd

12A/005, Church Road.

Liyanagemualla

Seeduwa. 11410

Sri Lanka

info@sterlinglanka.com

www.sterlinglanka.com