



# Third Party Code of Conduct



## Third parties have a role in compliance

### Keeping your commitment

We expect all third parties that do business with Genpact to share our commitment to integrity and to strictly adhering to all applicable laws and regulations.

This Code applies to all third parties doing business with or acting on behalf of Genpact, including but not limited to service providers, suppliers, vendors, alliance partners, consultants, agents, and contractors. The expectations described in this Code apply to all employees, other personnel, and any other third parties engaged by our third parties involved in the third parties' dealings with Genpact.

This Code provides guidance for managing some of the risks third parties might face, but it cannot cover every potential situation, so it is vitally important that third parties be prepared to raise issues and ask questions as necessary.

Violations of this Code may result in termination of services, subject to any relevant contractual provisions, and Genpact may exercise any other rights it has with respect to any violations of the Code.

This Code is subject to regular review by Genpact.

## Third parties must obey applicable laws and rules

Genpact expects third parties to comply with all applicable laws, rules, and policies. Third parties must also possess all necessary licenses and permits applicable to the services and/or goods they provide to Genpact.

### Speaking Up

Third parties should provide appropriate resources that allow their personnel to ask questions and report concerns. Third parties should also maintain a clear non-retaliation policy that protects those who report concerns.

Third parties may also direct any questions or concerns to:

[CPO.genpact@genpact.com](mailto:CPO.genpact@genpact.com)

Genpact's Ethics Helpline:

<https://genpact.com/speakup>

## Avoiding bribery and corruption

Third parties must not bribe or accept bribes or engage in other corrupt conduct. Bribes can be anything of value, including cash, meant to influence decision-making or secure a business advantage. We expect our third parties to conduct business transparently and to never seek a business advantage through bribery or corruption.

Third parties should take care when working with government officials on Genpact's behalf and never provide payments to expedite routine government actions (such as approving permits) unless such services are offered publicly and payments are made through official means.

Third parties are also responsible for making sure their own third parties, employees, agents, business partners, and contractors comply with these expectations.

## Competing fairly

Third parties are expected to comply with all applicable competition laws, to avoid seeking any

unfair advantage over any competitors, and to use only legal methods to gather information about the market. Third parties should act transparently with all partners, clients, competitors, and other third parties.

Third parties must avoid any discussions with any competitors about agreements to set prices and allocate markets.

## Complying with trade laws

Third parties are expected to comply with all applicable economic and trade sanctions or trade embargos. Third parties should take care not to conduct business with individuals or entities prohibited by applicable sanctions.

## Complying with tax laws

Third parties are expected to comply with all applicable tax laws and regulations. Third parties also shall not facilitate any tax evasion by others and shall maintain reasonable measures to prevent the criminal facilitation of tax evasion by their employees or other associated third parties. Genpact will not tolerate any tax evasion or tax fraud committed by our third parties.

## Anti-money laundering

Genpact expects third parties to comply with applicable laws related to money laundering or the funding of terrorist activities.

Third parties must identify and report any suspicious signs of either money laundering (i.e., the process of trying to hide the illegal source of income) or terrorist financing. Suspicious signs may include business partners providing vague or fictitious information; requesting unusual or significant changes in transactions, such as a change in the frequency, type, and location of payment; or making any other out-of-the-ordinary or suspicious requests regarding transactions.

## Supporting our environment

Third parties should respect the environment in the communities where they conduct business and make sure to follow all applicable laws and regulations relating to the environment. Third parties should pay special attention to the conservation of natural resources, including water and energy, and should integrate recycling of materials into routine business practices.

# Third parties must work honestly, transparently, and safely

## Navigating conflicts of interest

Conflicts can arise when a third party's interests interfere, or appear to interfere, with Genpact's interests. Third parties should avoid any conflict of interest or even the appearance of impropriety. Third parties must not:

- Use Genpact resources, influence, or name to promote themselves without Genpact's specific consent
- Use Genpact resources or information for an outside business or opportunity
- Pursue or encourage others to pursue business opportunities learned from their relationship with Genpact or that otherwise belong to Genpact

Third parties must disclose any potential conflicts to Genpact as soon as they are recognized.

Genpact discourages gifts to employees from third parties, and third parties should expect that a Genpact employee may return a gift that does not meet Genpact's gift guidelines. Genpact prohibits any third party from making a charitable donation on its behalf.

## Using Genpact property

Third parties must protect and use Genpact property only as directed. Genpact property includes any proprietary information, facilities, equipment, software, and email, as well as the Genpact name and the goodwill associated with our brand.

## Protecting intellectual property

Third parties are expected to protect Genpact's intellectual property (IP) and to use IP only as directed. Third parties may not share Genpact IP with others without express consent to do so. Genpact's IP includes any copyright, trademark, patent, trade secret, or other confidential technical material, as well as any other intellectual property associated rights.

Use of Genpact's name, logo, and other brand materials is allowed only with prior written consent.

## Communications

In general, third parties may not speak for Genpact. When they make public statements or conduct other

business communications, third parties must make sure there is no confusion about who is making the statements, and they should not speak for Genpact unless specifically authorized by Genpact to do so.

## Working with Genpact clients

Third parties must respect and observe any Genpact client instructions, such as policies, procedures, and guidelines, that apply to their work.

## Keeping records

Third parties must keep accurate and complete records, must never alter or falsify records in the course of doing business with Genpact, and must retain records as agreed by contract and subject to applicable law. Complete and accurate records must be provided promptly when requested, should Genpact conduct an inspection of documents or other review. Third parties must have appropriate processes in place to avoid fraud, waste, and abuse.

## Interacting with the government

Third parties interacting with government entities on behalf of Genpact must do so with candor and diligence. Third parties must cooperate with any reasonable governmental requests and inform Genpact, to the extent permitted by applicable law, of any governmental requests related to our mutual business.

## Avoiding insider trading

Third parties, including their personnel, should not trade stock or other securities based on any material, nonpublic information learned from their business relationship with Genpact.

## Protecting privacy and data

Third parties must maintain the confidentiality of all Genpact and Genpact client confidential information and data, and they must use it only for its intended purposes.

Genpact expects third parties to observe the applicable data privacy laws and regulations and to process personal data on behalf of Genpact only as permitted by documented instructions from Genpact.

Third parties who have access to personal data must ensure that the appropriate physical, administrative, technical, and organizational measures are in place to protect it.

Third parties must also comply with applicable standards in maintaining the security and privacy of any data and information systems used to conduct business with Genpact or Genpact's clients.

Third parties must ensure that adequate measures are in place to prevent, detect, and respond to any data security breaches and must immediately report any data or privacy breaches to Genpact by email to [infosec@genpact.com](mailto:infosec@genpact.com).

## Use artificial intelligence responsibly

Third parties must disclose to Genpact when artificial intelligence (AI) will be used in an engagement and comply with Genpact instructions and contractual limitations. Third parties must use AI responsibly in their work for and with Genpact and comply with applicable laws, including intellectual property laws.

## Third parties should ensure respectful working conditions

### Showing respect

Third parties should embrace fair employment practices and prohibit all forms of discrimination, including those based on race, color, ethnicity, religion, sex, sexual orientation, gender identity or expression, nationality, disability, or any other trait protected by applicable law.

Third parties should also discourage any form of harassment in the workplace. Harassment is any kind of unwelcome speech or physical conduct, such as making offensive comments or gestures, or subjecting others to bullying, unwanted touching, or retaliation.

It also includes sexual harassment, such as engaging in unwanted physical contact; making unwelcome remarks, "jokes," or advances; demanding sexual favors; or engaging in other unwelcome conduct of a sexual nature.

Genpact encourages third parties to support inclusive working environments for all employees, personnel, and other third parties.

### Working safely

Third parties must maintain a safe working environment free of unsafe conditions and unsafe behaviors.

## Supporting human rights

Genpact is committed to [human rights](#), and our third parties should share that commitment and promote the health and wellbeing of all employees.

Third parties must observe all applicable labor and employment laws, including all laws regarding minimum wage, minimum age requirements for employment, workers' compensation, workplace conditions, and other laws regarding the health and safety of employees. Third parties must also comply with all applicable laws and regulations regarding the use of forced labor, slavery, human trafficking, and child labor, and should guard against the existence of any such illegal labor practices in every part of their supply chains.