



genpact

| *on it*



Integrity @Genpact

Our Code of Conduct

A message from BK regarding our Code



Trust is our most valuable asset, and integrity is how we protect it.



Our Code of Conduct, Integrity@Genpact, guides us in working with integrity and ethics in everything we do.

Throughout our history, integrity and ethics have been core to who we are. The trust our clients place in us and the trust we place in each other are built on doing things the right way, even in difficult situations.

This Code guides our professional behavior and shows us where to seek help. Each of us is responsible for understanding and living by it.

If you see conduct that may be unethical or violate our policies, speak up. I encourage you to do so without fear – retaliation is not tolerated.

Together, we will continue to drive Genpact's success by embracing the integrity at the heart of all we do.

BK Kalra

Chief Executive Officer, Genpact



**Every day we live by
our values of courage,
curiosity, and incisiveness,
built on a bedrock of
integrity and inclusion.**

When it comes to working
ethically and honestly, at
Genpact, we're on it.





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01

We all have a role in compliance

Compliance is everyone's job at Genpact, and our Code is one tool to help keep that commitment.



Keeping our commitment

Our commitment: We recognize that we all have a role in compliance.

Compliance is everyone's job at Genpact, and our Code is a tool to help us keep that commitment. "Genpact" means Genpact Limited and all of its subsidiaries. Our Code applies to everyone at Genpact: employees, officers, directors, contractors, vendors, and other third parties acting on behalf of Genpact. There is no waiver of our Code.

What we do: We learn and follow our Code.

- We follow our Code, our policies, and the law
- We ask questions when we are not sure what policies, rules, laws, or regulations might apply
- We speak up when we have concerns
- We participate in training and educate ourselves about our Code and our policies
- We model professionalism and make ethical choices

Our managers' compliance commitment.

We expect managers to:

- Keep an open door and encourage employees to ask questions and report concerns
- Know our Code and be familiar with compliance resources
- Understand how to resolve concerns and when to escalate concerns
- Encourage open communication about compliance and ethics
- Relay our anti-retaliation message and report any retaliation immediately

In practice: we take our commitment to compliance seriously.

Aditi has mandatory online compliance training. Her manager tells her that the training isn't that important and to just quickly click through the training so she can get back to her regular responsibilities. What should Aditi do?

Our compliance training is a resource to help us better understand the risks we face and the responsibilities we all have. Aditi should take the training at a pace that allows her to fully comprehend the material, and if her manager tries to interfere, she should seek help from one of the reporting resources listed in our Code to make sure she completes her training.





In practice: How do we make ethical decisions?

We ask the following questions about our decisions and choices

We must be able to answer a clear “yes” to all of these questions to proceed.

- 1 Does our decision model Genpact’s purpose and values?
- 2 Does our decision follow our Code, our policies, and the law?
- 3 Would our decision maintain Genpact’s reputation for behaving ethically?
- 4 Would we be comfortable if our decision were made public?



Speaking up



Our commitment: We seek transparency.

Genpact is committed to maintaining a strong ethical culture. To achieve this and address any issues that arise, you must be committed to speaking up. Genpact cannot address potential issues until we know about them.

We understand that concerns about retaliation can discourage reporting, but know that Genpact does not tolerate retaliation. Those who engage in retaliation will face discipline.

What we do: Speak up.

- We seek help when we are unsure about a situation
- We report concerns when we believe our Code or our policies have been violated
- We report any retaliation

 See our **Speak Up Policy** and our **Legal Compliance site** for further information.

In practice: How do we raise concerns?

We can raise questions and concerns with our manager – who should be our first resource – or a higher level of management.

We can contact Human Resources

We can contact our Legal department

We can log on to <https://genpact.com/speakup> to make a report online or find a list of hotline telephone numbers. The Ethics Hotline is a way to raise a concern confidentially and, where permissible, anonymously if needed. If it is unclear where to report something, and it feels uncomfortable to contact any other resource, we can contact the Ethics Hotline.





Responding to concerns

Our commitment: Genpact takes reports of misconduct and other concerns seriously.

When employees raise concerns, Genpact appropriately investigates. We keep investigations confidential to the extent possible and practical and take appropriate corrective action and disciplinary measures based on any findings. Genpact looks to improve processes and provide solutions based on what we learn. The reporting employee may receive feedback when it is appropriate.

What we do: We provide honest information.

- We speak up with concerns
- We cooperate with any investigation
- We provide any requested data or information

 For more information, visit our [Legal Compliance site](#).

In practice: Everyone is responsible for our culture.

Naveen overheard his manager speak to some of Naveen's female coworkers in a derogatory fashion several times. But his coworkers have not complained to Naveen, and he assumes that if they were concerned, they would have reported the behavior themselves. Should Naveen do anything?

Yes. Naveen cannot assume his coworkers have made a report, and he has a duty, as we all do, to be an active part of our compliance program and speak up when he observes behavior that he believes may violate our Code or our policies. Naveen should report the incident to one of the resources listed in our Code so that Genpact can investigate the matter.



02

We are all committed to each other

Our team works most effectively when we build and maintain a workplace where we all value and treat each other with respect.





Showing respect

Our commitment: We all want to work in a respectful and fair environment.

Our Team works most effectively when build and maintain a workplace where we all value and treat each other with respect. Our team's strength is in our diversity and in our team members' professionalism and expertise.

What we do: We treat others the way we want to be treated.

- We do not engage in sexually harassing behavior, 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
 - We do not harass in the workplace, at events outside the office, or online
 - We do not ignore it when others engage in harassing behavior – we report it
 - We follow the law, Genpact global policies, and any applicable local policies
 - We measure employees' performance based on their merit and qualifications. We **never** treat others differently based in characteristics such as: Race, color, or ethnicity | Religion | Caste | Sex | Sexual orientation or gender identity or expression | Nationality | Disability | Any other trait protected by applicable law
 - We do not make employment decisions based on favoritism or nepotism, and we report any potential conflict of interest
- We treat others with respect and consider how our action might affect out team
 - We do not engage in any harassing behavior or unwelcome speech or physical conduct, such as making offensive comments or gestures, or subjecting others to bullying, unwanted touching, or retaliation of any kind

In practice: We support the best person for the job.

Stefan is considering who to promote to a leadership position in the division he oversees. Laila is a top candidate, but Stefan worries that some of the employees may not like reporting to a woman. What should Stefan do?

First, Stefan should not be considering Laila's gender when making his decision. We promote people based on their merit and qualification and do not consider characteristics such as gender. Secondly, Stefan has a responsibility to make sure that no one discriminates against Laila based on her gender.



Employee privacy

Our commitment: We recognize the importance of keeping personal information private.

Our duties at Genpact may mean we encounter personal information belonging to coworkers. We respect and protect any personal information we encounter.

What we do: We follow our privacy policies and take care when handling, using, or transferring personal information.

- We collect and use personal information only for legitimate business purposes
- We provide access to personal information only to those with authority to use it
- We keep personal information confidential and handle, use, or transfer it in a manner consistent with our policies and procedures
- We ask questions if we are not sure of the policies or procedures that apply
- We report any potential breach of personal information to infosec@genpact.com immediately



See our [Data Privacy Policy](#) and [Data Classification Guidelines](#).

In practice: Just what is “personal information”?

Personal information is information that can directly or indirectly identify a person, whether by itself or combined with other information. Common examples include name, address, identification numbers, telephone number, email address (whether personal or professional), medical information, and financial records (including salary or bonus information).



Working safely

Our commitment:
We all want to maintain a workplace that is free of dangerous conditions and violence.

We do not want anybody to feel unsafe or find themselves in danger of injury in our workplace. This means that we take note of unsafe conditions and unsafe behaviors and report any concerns to our manager immediately.

What we do: We work together to create a workplace that is safe for everyone.

- We report all unsafe behaviors and other safety concerns immediately to our manager or another resource in our Code
- We familiarize ourselves with all emergency procedures for our location
- We do not work impaired or under the influence of alcohol or drugs
- We do not threaten violence, intimidate others, or possess any weapons at the office

In practice: What should you do when confronted with a dangerous workplace situation?

- A.** Inform your manager or Security
- B.** Inform the local emergency services or authorities if there is an imminent threat
- C.** Alert others of the danger if it is safe to do so
- D.** All of the above

The answer is **“D. All of the above.”** When it is safe for us to do so, we should make sure our coworkers and any visitors at our workplace are aware of any dangerous condition, and we should always inform our manager or Security of any unsafe conditions. And in the case of an immediate emergency or threat, we should inform the local authorities.



For more information, see the **Physical Security Policy** and the **Environment, Health, Safety and Sustainability Policy**.



03

We are committed to Genpact

We do not allow our personal interests – financial or otherwise – to interfere with our duty to serve the best interests of Genpact.



Navigating conflicts of interest

Our commitment: We want transparency in all our business activities.

We do not allow our personal interests - financial or otherwise - to interfere with our duty to serve the best interests of Genpact. We must disclose any potential conflicts of interest to our manager and the Human Resources department as soon as we are aware of them.

What we do: We avoid conflicts whenever we can and disclose potential issues when they arise.

Some activities, opportunities, or situations may present potential conflicts of interest. Genpact must know when potential conflicts could exist. Some situations to pay attention to include:

Potential business opportunities

- Directing Genpact business to yourself, a relative, a friend, or a romantic partner
- Taking advantage of business opportunities learned through your role at Genpact
- Taking on a role as an employee, officer, or director of another organization, partnership, or business concern, including non-profit or political organizations
- Taking a personal financial interest in another company, including through stock ownership

Gifts and entertainment

- Accepting entertainment or a gift from a supplier, other partner, or third party that is not normal and customary and could be viewed as obligating you or influencing your decision-making for Genpact
- Taking discounts or other opportunities offered by partners or third parties, or soliciting gifts or

opportunities that could be viewed as obligating you or influencing your decision-making for Genpact

- Accepting cash or cash equivalents such as gift cards (with a narrow exception for gift cards from clients described in the Gifts and Entertainment Policy)
- Failing to follow applicable gift and entertainment limits and other requirements in our **Gifts and Entertainment Policy**

Personal relationships

- Directing business opportunities, employment, or Genpact resources to any business that is owned or managed by a relative, friend, or romantic partner
- Hiring or supervising a relative, friend, or romantic partner
- Conducting a personal or romantic relationship with a fellow employee, client, or other third party

Misuse of or carelessness with Genpact resources

- Using Genpact property or assets, such as equipment, intellectual property, or confidential information, to promote or assist an outside business opportunity for yourself or others
- Using Genpact intellectual property or confidential information after you have left Genpact, or buying or selling securities of any company when you have material non-public information about that company obtained through your work with Genpact
- Revealing confidential information or Genpact intellectual property while participating in discussions, forums, or any other external communications (see also the Communicating on behalf of Genpact section of our Code)

If you find that any of your activities, opportunities, or situations potentially fall into the above categories, please seek guidance from your manager or one of the other resources listed in our Code and disclose the potential issue.



If you are unsure whether an activity, opportunity, or situation could be a conflict of interest, seek guidance.



In practice: Put Genpact's interests first, and be transparent.

Gilda is on the team reviewing a potential new vendor. Gilda's cousin is an employee with the potential vendor. The potential vendor seems to meet all of Genpact's requirements and is the most promising option. Should Gilda disclose her family relationship?

Yes. This could be viewed as a potential conflict of interest, since Gilda is on the review team. This does not mean there is a conflict of interest, nor does it mean that the potential vendor may not win the business with Genpact, but the decision-making process must be transparent, and Gilda must make sure Genpact is aware of the relationship she has with an employee of the potential vendor. Gilda should disclose this to her manager or the Human Resources department.

One of our vendors gives Remesh a gift in the form of a small basket of candies and fruit. In his locale, it is typical to exchange holiday gifts with business associates, and he knows that several other employees at Genpact and other companies received the same gift. Since Remesh doesn't believe this gift was meant to influence him, is it okay to keep it?

No matter whether Remesh believes the gift is meant to influence him or not, he must report it to his manager, who may seek further guidance from the Legal department, consistent with Genpact's policies. It may be that he can keep the gift or share it with his local team, but he must first discuss it with his manager to get guidance on the right course of action. On the other hand, he may have to politely return the gift due to circumstances he may not personally know. Because it is a gift from a vendor, it must be properly disclosed and, as with any gift, be considered under our Global Business Entertainment and Gift Procedure.



See our [Gifts and Entertainment Policy](#) and [Conflict of Interest Policies](#) for further information



Using Genpact property



Our commitment: We protect and conserve Genpact's assets.

We cannot take on new challenges if we do not have the resources and tools to get the job done. We cannot deliver for our clients if our assets have been misused or wasted.

What we do: We properly use and maintain Genpact property.

- We protect Genpact's property from theft, abuse, and misuse
- We carefully use and maintain Genpact's assets
- We appropriately use technology assets only for Genpact business
- We promptly report any misuse, abuse, or theft of Genpact property

In practice: What are Genpact's assets and property?

Genpact's assets include:

- Technology assets such as computers, tablets, smartphones, other hardware and devices, networks, and approved software and cloud services
- Records and other company data supplies
- Facilities and office equipment and supplies
- Intellectual property (see Protecting Genpact's intellectual property in our Code)



See our **Remote Working, Mobile Computing, and BYOD Policy** and **Acceptable Use Policy (AUP)** for further information.



Protecting Genpact's data



Our commitment: Protecting our data allows us to serve our clients.

To meet our business goals, we must keep our confidential and proprietary data safe.

What we do: We keep data safe.

- We follow all our policies and procedures, including all information security and data privacy requirements
- We are careful with passwords, and we secure data in physical and digital form
- We never share information with unauthorized people through any means
- We know that our duty to keep Genpact's data confidential exists even after our employment ends
- We report all information security incidents immediately to infosec@genpact.com

In practice: What data must we protect?

- Business goals or plans
- Financial information, including projections and performance data
- Strategic information, such as mergers, sales of assets, new product lines, or changes in executive management
- Intellectual property, including trademarks, copyrights, patents, and trade secrets

See our [Information Security and Privacy Policy](#), [Password Policy](#), and [Data Classification Guidelines](#) for more information.



Protecting Genpact's intellectual property

Our commitment: We develop, use, and protect intellectual property that belongs to Gepact.

We use our intellectual property to better serve our clients and go beyond what is expected.

What we do: We protect our tools, including our intellectual property.

- We do not disclose intellectual property that belongs to Genpact or to any partner or other third party
- We comply with all guidelines for use of intellectual property, including copyright, trademark, or trade name, including Genpact and any associated marks.
- When we create any work or invention in the course of employment with Genpact, we inform our manager and review our work with the Legal department
- We agree that any intellectual property created by us at Genpact is subject to the Employee Innovation and Proprietary Information Agreement (EIPIA)
- We inform our manager if we learn of the development of any tool, technology, product, or other intellectual property at Genpact that is similar to other intellectual property that we believe has been previously developed by a former employer or another organization

In practice: What is intellectual property?

Intellectual property is tangible or intangible legal property that is the result of creative or scientific discovery. Some examples of intellectual property include:

- Trademarks, such as logos, symbols, or names
- Patents
- Copyrights
- Trade secrets, such as formulas, patterns, devices, methods, financial or business data, customer lists, or other business intelligence



See our **Patent Policy** and our Employee Innovation and Proprietary Information Agreement (EIPIA) (reach out to your HR team for a copy).



Using AI Responsibly



Our commitment: We develop and use artificial intelligence responsibly.

We incorporate the following principles to inform our use of AI across Genpact:

- Trust, privacy, and compliance
- Safety and security
- Fairness and non-discrimination
- Explainability and transparency, and
- Accountability



See our **Responsible AI Policy** for more information.

What we do:

We use approved AI tools like Genpact Scout for work purposes

We obtain appropriate approvals for new AI products and use cases

We follow company policies and guidelines for the compliant use of AI



Avoiding insider trading

Our commitment: We do not trade on inside information.

Insider trading occurs when someone uses “inside” - or non-public - information to buy or sell stock or other securities in Genpact or any other company. Inside information is information that would be important - or material - in deciding whether to buy or sell a company’s stock or other securities. Common examples include using material, non-public information to conduct trades yourself or providing inside information to any other person so that they might trade. These actions are against the law and our policy.

What we do: We follow our policy and guidelines when trading stock and securities.

- We do not trade stock or securities of any company about which we have inside information
- We do not provide others with inside information
- We do not share confidential information regarding Genpact, its clients or any other company
- We familiarize ourselves with any additional trading requirements related to our role
- We seek guidance from the Legal department if we are unsure about buying or selling securities of Genpact, a client, or a vendor



In practice: We keep inside information confidential.

Carlos and his team have been working for months on a new transformation service offering that the team believes will revolutionize the services Genpact can provide to clients. Although the development hasn’t been announced yet, Carlos is so excited, he tells his friend Nita, who does not work for Genpact. Is this okay?

No. Even if it’s not Carlos’s intention, he is providing material, non-public information to Nita that she, or someone else she might tip, could use to purchase or sell Genpact shares. That violates our policy and could violate the law. If we believe that such information may have been shared, even by accident, we must report it immediately to the Legal department or an ombudsperson.



See our **Insider Trading Policy** for more information.



Keeping accurate records

Our commitment: Our records must accurately reflect our business activities.

We keep accurate and complete records and record information in a timely fashion in order to both meet our obligations and ensure any reports that are based on those records are also accurate and complete. Our records include all work-related documents, emails, spreadsheets, notes, reports (including timecard records and operating metrics), financial records, plans, procedures, and process documents.

What we do: We keep accurate, timely, and complete records.

- We never alter or destroy records except as indicated in any applicable data retention policies and schedules
- We preserve our records according to any applicable data retention policies and schedules, any legal holds, and any applicable law
- We record only accurate and complete information
- We record financial information in accordance with Generally Accepted Accounting Principles (GAAP) and applicable policies, procedures, and law
- We make sure all agreements, including contracts with clients, are in writing



In practice: Our records must be complete and accurate.

Adam is responsible for providing performance data for his team's quarterly report. His manager has asked Adam to include data for work that has not been completed yet, stating, "we know we will be completing that work soon." When Adam tells his manager that this is unusual, his manager tells him not to worry about it and to enter the information into the quarterly report. What should he do?

Adam should immediately report his concern to another resource listed in our Code, like his one-over-one manager or an ombudsperson. We cannot allow inaccurate or incomplete information to be entered into our books and records. No manager has the authority to tell an employee to do otherwise.



See our [Information Governance Policy](#) and our [Anti-Fraud Policy](#) for more information.



Communicating on behalf of Genpact

Our commitment: Genpact must speak with one voice.

Our reputation with our clients and the public is framed by how we communicate. It is vital that Genpact speak with a consistent and cohesive voice and that our communications be well planned and executed.

What we do: We communicate responsibly, no matter the method.

- When using social media, we are clear that we speak for ourselves and not Genpact
- When using social media, we stop and think before posting and make sure we post accurate information
- We understand that our Code and policies still apply online
- We never share confidential or inside information
- We communicate with the public only if we are authorized to do so
- If we are contacted by any member of the media, we notify Communications using the contact information in the Media Relations Policy
- If we prepare any presentations, public statements, or articles for professional organizations or other publications, we share them first with Communications for approval

 For more information, see our **Media Relations Policy** and our **Social Media and Digital Communications Policy**.

In practice: What should you post?

Which of the following is an acceptable use of social media under Genpact's policy?

- A.** Fiona sees a post on social media that suggests that one of Genpact's products has been stolen from another company. She knows this isn't true, and she posts a response that says so.
- B.** Gregory is excited about Genpact entering a new market in a country where he attended university. The announcement is set to be made tomorrow, and Gregory decides to post tonight so that his friends in the new market know about this exciting development.
- C.** Riya sees an article in a national magazine that talks about Genpact's corporate social responsibility efforts, and she shares the article with everyone in her feed.
- D.** Claude sees a post from one of Genpact's competitors that claims they are the leader in providing some of the same services Genpact delivers. He disagrees with this and posts a response calling this inaccurate.

Only "C" above is an appropriate use of social media. We do not speak on behalf of Genpact or respond to information we feel is inaccurate about our company. We can always inform Communications if we have concerns about information we have discovered online. We also never reveal confidential or non-public information whether online or otherwise.



04

We are committed to our clients

While seeking to provide innovative and transformational services to our clients, we must also focus on following all applicable laws and regulations as well as our Code and our policies.



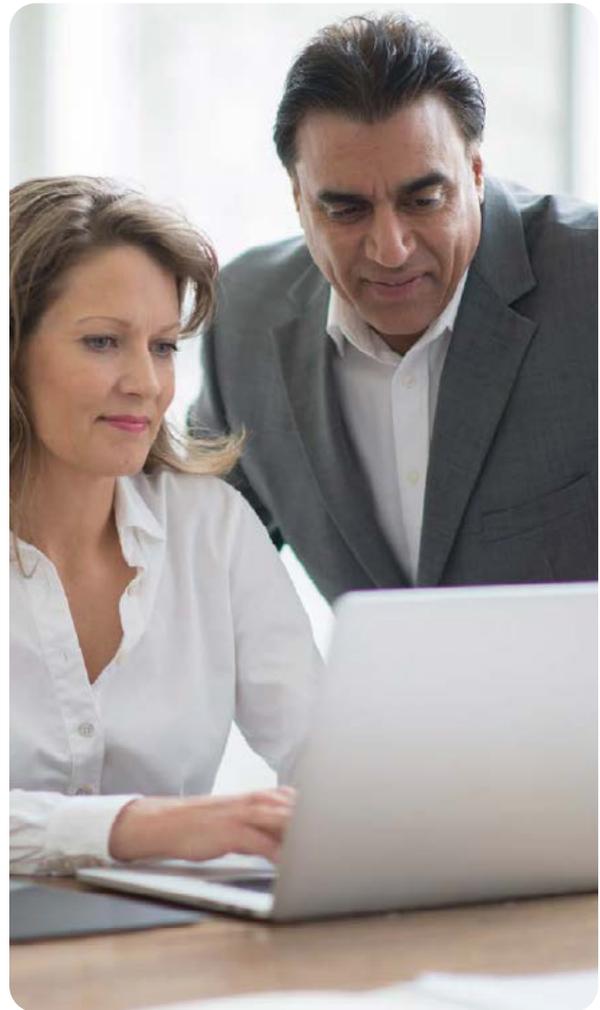
Working with our clients

Our commitment: We build and maintain trust with our clients by putting their needs first and providing solutions to their business challenges.

While seeking to provide innovative and transformational services to our clients, we must also focus on following all applicable laws and regulations as well as our Code and our policies. We do things the right way and always maintain our integrity.

What we do: We act professionally and ethically.

- We are honest with our clients and communicate transparently
- We seek to innovate and inspire while maintaining a focus on our clients' goals
- We think carefully and creatively about our clients' needs and solutions that will work for them



In practice: How we show our commitment to our clients.

Phoebe is a front-line manager on a team providing accounts payable services to a client. Phoebe is responsible for reporting service level agreement (SLA) accuracy to the client. After reporting the SLA figures for January, Phoebe discovers that a calculation error caused the reported accuracy level to be 0.5% higher than it actually was. Should Phoebe correct Genpact's records internally but not inform the client, or should she also inform the client?

Phoebe should correct the SLA figures internally and provide an updated report to the client, explaining the fact of the calculation error. We are always transparent and upfront with our clients.



Keeping client information confidential

Our commitment: We respect the confidentiality of our clients' information, and we keep it safe.

Our clients engage us because they trust us. They trust us to provide solutions and services that meet their needs, and they trust us with their confidential information. We earn and maintain that trust by keeping client information safe.



What we do: We keep client information safe.

- We do not disclose the names of our clients unless we have permission to do so
- We use client information only for approved business purposes
- We follow all our policies and procedures regarding data security, including all restrictions on sending client confidential information outside our or the client's secure systems
- We collect, store, use, and transfer client information consistent with any agreements and applicable law
- We stop, think, and seek guidance if we are unsure about whether an action will jeopardize the safety of our clients' information

In practice: We cannot use client information for the client's consent, and we may never use it for personal purposes.

Frieda contacted Nikhil about a new client who is expanding operations to a new country. Frieda knows that one of Nikhil's former clients moved into that market a few years ago and developed a strategic plan for the business to follow regarding their expansion. Frieda asks Nikhil to share his former client's strategic plan with her. Is this okay?

No. Client information belongs to the client, not Genpact; we are just stewards. When a client entrusts Genpact with their information, they expect us to use it only as we are authorized to do so.

 See our [Data Privacy Policy](#) and [Communication Security Policy](#) for more information.



05

We are committed to our communities

Attempting to win or influence business through bribery or corruption is against the law and against Genpact's policy.



Participating in politics

Our commitment: We are involved in the communities where we live and work.

Working to support our communities and the causes and candidates we care about is important to many of us. Genpact respects the right of all employees to participate in the political process in their own way and on their own time.

What we do: We encourage transparent participation in politics.

- We do not suggest that Genpact endorses or supports any cause or candidate
- We do not suggest that we are working on behalf of Genpact when we support any cause or candidate
- We do not use any Genpact resources for any campaign, including working on behalf of a cause or a candidate during our scheduled work hours
- We neither conduct campaign efforts on Genpact property nor engage Genpact employees regarding causes or candidates, including soliciting campaign contributions during our scheduled work hours or on Genpact property
- We inform our manager or the Legal department before we campaign as a candidate for any local, regional, or national office, and we make sure we have considered and disclosed any potential conflicts of interest



Avoiding bribery and corruption

Our commitment: We work to level the playing field and reduce the influence of corruption.

Attempting to win or influence business through bribery or corruption is against the law and against Genpact's policy. It is contrary to our values and could severely damage our reputation and our business as well as create legal difficulties for Genpact and any employees involved. We secure business for Genpact by delivering superior services and meeting our clients' needs, not by taking shortcuts.

What we do: We conduct business transparently and never seek an advantage through corruption or bribery.

- We never bribe anyone, and we never accept any bribes
- We are careful when we interact with government officials, as there can be strict laws and rules about providing any gifts or entertainment to government officials, and we seek guidance if we have questions
- We follow all policies and procedures regarding the giving and receiving of gifts and entertainment, and we maintain accurate records
- We do not provide payments to government officials to expedite routine actions (such as approving permits) unless such services are officially offered and payments are made through official means
- We make sure that anyone who is acting on behalf of Genpact, whether it's a partner, agent, representative, consultant, or any other third party, is aware of our policy regarding bribery and corruption and does not engage in these activities on Genpact's behalf
- We make sure we follow all applicable policies and procedures, including any necessary due diligence, when working with any new partners and third parties
- We ask questions and report concerns to the Legal department or an ombudsperson when we are not sure about making or receiving payments, offering or accepting gifts and entertainment, working with government officials, or any other potential corruption issues





What is a bribe?

A bribe is anything of value given with the intent of securing business or any business advantage. Anything of value is just that - anything that has value - including cash, gifts, entertainment, favors, donations, employment, or other business opportunities.

Who is a government official?

A government official can be anyone employed directly by a government or employed by a government-owned or government-controlled company, such as a government-owned factory. It can also include a member of a political party, a political candidate, or other local or regional officials. More detailed information can be found in the Anti-Corruption Policy.



Learn more: see our **Anti-Corruption Policy** and our **Gifts and Entertainment Policy** for more information.

In practice: We look out for requests or arrangements that could be seen as corrupt.

Ahn is working to secure a new project with a potential client. While she is discussing the details and scope of the potential work with the client, the client's representative mentions that the client sponsors a charitable foundation and that it might be nice if Genpact were to make a donation to the foundation. While the client did not say the potential project depended on any donation, Ahn thinks it might help secure the business. Would it be okay to suggest that Genpact make a donation?

No. Anything of value, including donations to charities suggested by a party, could be considered a bribe. The person requesting the donation from Ahn need not directly benefit if the intent or effect of the payment is to try to influence decision-making.



Competing fairly and following international trade rules

Our commitment: Our clients and our industry benefit from fair competition and compliance with trade controls.

Agreements between competitors to set prices and allocate markets are unfair, unethical, and illegal. We cannot participate in any discussions with competitors that could be misunderstood to be collusion or an agreement to limit competition.

A variety of trade controls and sanctions may be applicable to our business. We carefully comply with applicable import and export controls regulations, sanctions, and anti-boycott laws.

What we do: We are transparent in our dealings with our partners, clients, competitors, and other third parties.

- We never make agreements with competitors or others regarding prices, margins, offerings, or allocations of markets, regions, industries, or clients
- We are careful about our communications with competitors, both in general and specifically at industry events, and we avoid even the appearance of agreement on competition-related issues
- We do not seek any competitive information that is not publicly available
- We follow applicable sanctions laws, trade compliance laws, and our policies
- We report any concerns immediately to the Legal department

In practice: we must be careful when interacting with competitors.

During lunch at his first trade show, Rashad meets a representative from a competitor who covers the same industry as Rashad. The representative suggests that she and Rashad pool their information about their clients to increase their overall client data. Would this be okay?

No. Rashad should not discuss any client information, nor any industry or market data, with a competitor. Rashad should also end any further conversation with the competitor's representative and report this conversation to his manager and the Legal department immediately.



See our [Trade Controls Policy](#) for more information.





In practice: We cannot use Genpact’s name or assets to support our political causes and candidates.

Samuel has decided to run for the local town council. The position is unpaid, and the meetings are in the evening and will not conflict with his daytime duties at Genpact. During his lunch hour, he has taken some time to make a few copies of a campaign flyer in our office. He plans to hand out the flyers to his coworkers at the end of the day. Which of the following parts of Samuel’s plans could be potential issues?

- A.** Entering the race for town council
- B.** Making copies of his campaign flyer at the office
- C.** Handing out the campaign literature to fellow employees at the office
- D.** All of the above

The answer is “D. All of the above.” While Samuel may believe that his plan to run for local office presents no conflicts of interest, just because the position is unpaid and part time does not mean there could not be a potential conflict with him taking on local governmental responsibilities. Before pursuing such a role, he should disclose his intentions to his manager and the Legal department. Using Genpact assets, such as our copying machine, for personal political causes or candidates is not allowed. And Samuel should not make coworkers feel coerced or uncomfortable about supporting him as a local candidate by passing out literature at the office.



Interacting with the government

Our commitment: We maintain a respectful and transparent relationship with all government agencies and departments with which we engage on behalf of Genpact.

Genpact operates under the supervision of many government entities around the world. We approach these relationships with candor and diligence.

What we do: We are diligent about our interactions with the government.

- We cooperate with reasonable requests from government officials and immediately inform our manager and the Legal department when we receive such requests
- We cooperate and provide accurate and complete information whenever we participate in any government inquiry or audit or otherwise provide information to the government
- We make sure we are familiar and compliant with any government requirements that apply to our role, including any reporting or disclosure requirements

- We accurately and completely maintain all records and data regarding interactions with government authorities
- We make sure we are familiar both with company policies regarding gifts and entertainment for government officials and with any other rules, regulations, or laws that might apply to gifts and entertainment
- We seek guidance from the Legal department before we extend an offer of employment to any current or former government official or in response to a government official's referral of a candidate
- We seek help from our manager or the Legal department if we have any questions regarding our interactions with the government or with government officials

In practice: We engage in careful hiring.

Dev's cousin used to work for the local municipal authority. She has recently left her role with the government and is looking for a new job. Dev thinks she would be a good fit for an opening on his team. Can Dev suggest his cousin be considered by the hiring manager? Yes, as long as he fully discloses his relationship as her cousin and her former governmental role so that the hiring manager and the Legal department can appropriately investigate any potential conflicts.



Learn more: see our [Anti-Corruption Policy](#) for more information.



Supporting human rights

Our commitment: We respect human rights.

We act ethically and support human rights and expect all of our clients, partners, and other third parties to do the same.

What we do: We protect our fellow employees and others.

- We do not use or condone the use of child labor or forced or involuntary labor
- We comply with all applicable local laws regarding the health and safety of our workforce
- As necessary, we implement any action plans that have been developed to combat slavery and human trafficking
- We speak up and report any concerns we have about human rights or working condition issues

 **Learn more:** see our [Human Rights Policy](#) and [Antislavery and Human Trafficking Policy](#) for more information.



In practice: We speak up if we have a concern about human rights.

In discussing a recent trip he took to visit a client's manufacturing facility, Phillip tells Georgia he believes that some of the workers he saw there may be underage. He wasn't certain, though, so he didn't say anything to the client or to his and Georgia's manager. Should Georgia do anything?

Yes. We always report issues that violate our Code, our policies, or the law. Georgia and Phillip do not need to have explicit proof, or to have witnessed the situation firsthand, to report a concern.



Supporting our environment

Our commitment: Our continued success depends on thriving, healthy communities.

We all share responsibility for making reasonable and sustainable choices to support our environment.

What we do: We consider our impact on the environment and seek to limit it.

- We seek to reduce energy consumption at our facilities
- We recycle and look for ways to minimize resource use
- We leverage technology to meet our goals
- We participate in meaningful initiatives as volunteers, donors, and leaders

In practice: What is sustainability?

Sustainable practices are those practices that allow us to meet our operational needs today without compromising or impeding our ability to meet future needs. It means we use only what we need and conserve what we can.



Learn more: see our **Corporate Social Responsibility Statement** and our **Environment, Health, Safety and Sustainability Policy** for more information.

A reminder about speaking up

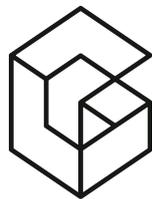
How do we raise concerns and speak up?

- Our first resource is our manager. We can raise questions and concerns with our manager or a higher level of management
- We can contact Human Resources
- We can contact our Legal department

We can log on to <https://genpact.com/speakup> to make a report or find a list of hotline numbers. If it is unclear where to report something, and it feels uncomfortable to contact any other resource, we can contact the Ethics Hotline.



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