



gradient

Business Integrity
Program

April 12, 2023



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Message from the CEO



“You are responsible for building and growing Gradient into a lasting and impactful technology company.”

ANURAG BAJPAYEE

Co-Founder and CEO

Although technology is the core of our existence, Gradient was founded with the mission of building an organization “of the people” - a culture and environment powered by a dedicated and passionate team who share common values of humility, service, curiosity, and candor. We strive to stay true to that mission but need the contribution of every single member.

This document provides a reference for the everyday conduct of all Gradient employees, at all levels of the company and in all countries where it operates, since conducting our business as professionals, treating our customers with respect, and meeting our responsibilities means doing our job properly.



The 3 Pillars of our Business Integrity Program



“Our principles are at the heart of the way Gradiant conducts its business in all geographies and with all stakeholders. It helps each one of us to live up to our values of honesty, integrity, and respect.”

PRAKASH GOVINDAN

Co-Founder and COO

1. Code of Conduct

Sets out the rules and guide points within which every Gradiant employee must operate every day. It instructs and advises you how to avoid situations that may damage you or Gradiant.

2. Suppliers' Principles

To inform any third party engaged by the company of our key messages and values, Business Integrity Health, Safety, Security and Environment, Social Performance as well as Labour and Human Rights.

3. Ethics Point

Web-based reporting system to communicate your concerns confidentially and anonymously



The Fundamental Principles of the Business Integrity Program



“Long-term profitability is essential to achieving our business goals and to our continued growth. It is a measure both of efficiency and of the value that customers place on Gradiant products and services. Any investment decisions should include sustainable development considerations - economic, social, and environmental.”

LUKE JOHNSON

CFO and Board Member

What we must not do

We do not tolerate any violations of applicable laws.

What we have to do

Act according to professional conduct. We follow Gradiant internal policies that guide our respective professions. This is the second step to demonstrate our ability to generate value even with complex regulations.



What we should do

Act responsibly towards the planet and civil society. We can do more to meet the needs of all our stakeholders with fair competition and sustainable development always at the heart of our everyday actions.

Our approach is to encourage employees to exercise their rights to express any ethical concern. It's also to reinforce the role of the Manager who is the key person to advise, answer questions, align practices with objectives and set the tone for the team.

We believe that this is truly compatible with a vision of prosper business. We call this the Business Integrity Program.



What is Your Role in the Business Integrity Program?

Each one of us, regardless of our position, shares the responsibility for creating a positive environment.

All employees should be:

1. Informed of the Business Integrity Program and its Three Pillars

All employees must have access, understand, and respect the principles of the Business Integrity Program.

2. Aware of our new Ethics & Compliance Reporting Tool:

Which can be found at: [Ethics Point](#)

3. Trained yearly on the main fundamental principles of the business integrity program

You will have to refresh your knowledge on the Three Pillars and pass the on-point knowledge test by the due date on a yearly basis.

A technical drawing or blueprint background with various mechanical and structural lines, including circles, rectangles, and lines representing components of a machine or building.

How do I deal with an Unethical Situation?

Doing your part to build communication and promote **safety, security, and ethical behavior**.

1. Consult Gradiant “Code of Conduct” to know more about how you should handle an unethical situation.
2. Identify the relevant people to talk to: manager, HR or Local Compliance Contact.
3. Use “Ethics point” - Gradiant Whistle Blowing Tool - web-based reporting system to communicate your concerns confidentially and anonymously.



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