



ATNIS Code of Ethics

This policy sets out our commitment to creating a workplace where every individual feels valued, empowered, and heard.



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Our Commitment

At ATNIS, we operate at the forefront of large-scale data transformation and technology solutions across global markets, including Australia, India, and Singapore. Our work impacts critical business operations, and with that comes responsibility.

This Code of Ethics defines the standards that guide how we conduct business lawfully, ethically, and with integrity. It reflects our commitment to our employees, clients, partners, and stakeholders.

Maintaining trust is not optional. It is fundamental to our success.

Scope of the Code

This Code applies to:

- All ATNIS employees, officers, and directors.
- Contractors, Consultants, and third-party representatives.
- All business units and operations across region.

Every individual associated with ATNIS is expected to understand and comply with this Code. Failure to do so may result in disciplinary action, including termination, and may also carry legal consequences.





Our Core Principles

Integrity in Everything We Do

We conduct our business with honesty and transparency. We do not compromise ethical standards for commercial gain.

Accountability

We take ownership of our actions and decisions, individually and collectively.

Respect for People

We foster a professional environment built on mutual respect, fairness, and inclusion.

Excellence in Execution

We are committed to delivering high-quality solutions while maintaining ethical standards.

Responsible Innovation

As a technology-driven organization, we ensure that innovation especially in data and AI is applied responsibly and ethically.

Ethical Decision-Making

Employees are expected to exercise sound judgment in all situations. When faced with uncertainty, consider:

- Is this action compliant with applicable laws and regulations?
- Does it align with ATNIS values and this Code?
- Could it negatively impact ATNIS's reputation or stakeholders?
- Would this decision withstand external scrutiny?

If in doubt, seek guidance before proceeding.

Speaking Up & Reporting Concerns

ATNIS promotes openness and accountability. Employees are expected to report unethical behavior, policy violations, or any illegal or unsafe activities through their manager, HR, or designated compliance channels.

ATNIS strictly prohibits retaliation against anyone who raises concerns in good faith.



Ethical Business Practices

Anti-Corruption and Bribery

ATNIS maintains a zero-tolerance approach to corruption.

- Facilitation payments are strictly prohibited.
- Third parties must not be used to bypass these standards.
- No employee may offer, give, solicit, or accept bribes or improper payments.

All business dealings must be transparent and lawful.

Accurate Records and Reporting

We maintain accurate and complete records of all business transactions.

- Financial records must reflect true and fair information.
- No falsification, misrepresentation, or omission is permitted.

Gifts and Business Courtesies

Gifts and hospitality must:

- Be reasonable and appropriate.
- Not influence business decisions.
- Comply with applicable laws and company policies.

Cash or cash equivalents are strictly prohibited.

Fair Competition

ATNIS competes fairly and lawfully.

- No anti-competitive agreements.
- No misleading or deceptive practices.
- No sharing of sensitive information with competitors.

Insider Information

Confidential or non-public information must not be used for personal gain.

Employees must not:

- Trade based on insider information.
- Share sensitive business information externally.

Compliance with Global Regulations

As a multinational organization, ATNIS complies with:

- International trade laws.
- Export and import regulations.
- Local laws in all operating regions.



Prevention of Financial Crime

ATNIS does not engage with entities involved in illegal financial activities.

All employees must:

- Conduct proper due diligence.
- Report suspicious transactions or behavior.

Respect for People and Workplace Standards

Professional Conduct

All employees are expected to:

- Treat others with dignity and respect.
- Maintain professionalism in all interactions.
- Avoid any form of harassment, discrimination, or abuse.

Equal Opportunity and Inclusion

Employment decisions are based on merit.

ATNIS does not tolerate discrimination based on:

- Gender, race, religion, nationality, or any protected characteristic.

Workplace Health and Safety

We are committed to maintaining a safe and secure work environment.

- No violence, threats, or unsafe behavior.
- No substance abuse in the workplace.

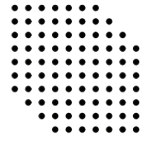
Human Rights Commitment

ATNIS strictly prohibits:

- Forced labor
- Child labor
- Human trafficking

We expect the same standards from all partners and suppliers.

Data, Technology, and Information Security



Data Privacy and Protection

Given the nature of our business, safeguarding data is critical.

Employees must:

- Handle data responsibly and securely.
- Access information only on a need-to-know basis.
- Report any data breaches immediately.

Information Security

- Use only approved systems and tools.
- Protect login credentials and company devices.
- Prevent unauthorized access to systems.

Confidential Information

All non-public information must be protected.

This includes:

- Client data.
- Business strategies.
- Financial information.

Obligations continue even after employment end

Responsible Use of Technology and AI

ATNIS is committed to ethical technology use.

- Ensure transparency and accountability in AI systems.
- Avoid bias and misuse of data.
- Protect user privacy at all times.



Conflicts of Interest

Employees must avoid situations where personal interests conflict with company interests.

Examples include:

- Financial interests in competitors or partners.
- Personal relationships influencing business decisions.

All potential conflicts must be disclosed promptly.

Financial Responsibility

Employees are expected to:

- Use company resources responsibly.
- Prevent fraud or misuse of funds.
- Ensure accurate reporting of expenses and transactions.

Communication and Representation

Only authorized individuals may speak on behalf of ATNIS.

Employees must:

- Avoid sharing confidential information publicly.
- Use social media responsibly.
- Clearly distinguish personal views from company positions.

Record Management

All business records must be:

- Maintained accurately.
- Stored securely.
- Disposed of in accordance with company policy.

Roles and Responsibilities

All Employees

- Act with integrity.
- Follow laws, policies, and this Code.
- Report concerns.
- Exercise sound judgment.

Managers and Leaders

- Lead by example.
- Promote ethical culture.
- Address concerns promptly.
- Ensure team compliance.

Conclusion:

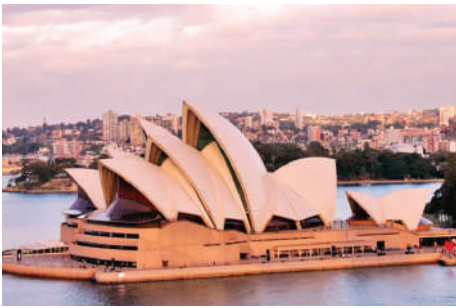
This Code of Ethics reflects ATNIS's unwavering commitment to integrity, accountability, and responsible business practices in every aspect of its operations. It serves as a guiding framework for decision-making, ensuring that all actions align with our core values and ethical standards. Every employee and stakeholder plays a vital role in upholding these principles, contributing to a culture built on transparency, respect, and professionalism.

Our reputation is built on trust and that trust is earned through the consistency of our actions, the honesty of our communication, and the responsibility we demonstrate in every decision we make. By adhering to this Code, we strengthen not only our organization but also the confidence that our clients, partners, and communities place in us.





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