



**Technologies and innovations for helping humanity and
beyond**

CODE OF CONDUCT

August 2017

Why a Code of Conduct

For over 7 years, Hanumayamma Innovations and Technologies, Inc., has upheld a tradition of being a responsible citizen of the community we serve. Our ongoing commitment to offering customers quality software products, farmers quality of data science products and services, members health care data innovation services, while fully complying with the law, and meeting the highest ethical standards of business conduct continues today. In the software industry, change is something we can always count on. While change is expected, some things must stay the same, such as our commitment to serving our farmers & members and our community with the highest level of ethical behavior.

As you know, trust is key to the success of any business and ethical conduct is the foundation upon which trust is built. Ethical conduct simply means doing the *right thing*. Most of us – if not all of us – come to work every day with the best intentions to do the right thing, to live by the company values and to do what's right. But sometimes it is hard to determine what "right" is. That is why we have a Code of Conduct – to support you in making these choices.

The Code of Conduct is the cornerstone of the Hanumayamma's Compliance Program. It contains the standards of behavior that each one of us is expected to observe while performing our jobs. Spelling out these standards helps us all maintain a culture of integrity and excellence.

I support and live by this Code of Conduct. Our Hanumayamma Board of Governors supports and lives by this Code of Conduct. Please join us in our ongoing efforts to operate our business according to this Code of Conduct.

Anitha Ilapakurti
Chief Executive Officer



Dairy IoT Sensors

TABLE OF CONTENTS

WHAT IS A CODE OF CONDUCT?	5
WHO THE CODE OF CONDUCT APPLIES TO	5
OUR VISION AND MISSION.....	5
OUR VALUES	6
WHO TO CONTACT	6
CODE OF CONDUCT POLICIES	8
PROFESSIONAL ETHICS	8
COMPLIANCE WITH LAWS, REGULATIONS AND CONTRACTS.....	8
CONFIDENTIALITY.....	8
CONFLICTS OF INTEREST & DISCLOSURES.....	10
<i>Potential Conflicts of Interest Examples:</i>	<i>10</i>
PROTECTION OF COMPANY ASSETS	10
<i>Corporate Asset Examples:</i>	<i>11</i>
BUSINESS INDUCEMENTS.....	11
<i>Potential Business Inducements Examples:</i>	<i>11</i>
FAIR BUSINESS DEALINGS	12
ACCURATE RECORDS	12
EQUAL OPPORTUNITY AND TREATMENT	13
POLICY:	13
OBLIGATION TO REPORT	13
POLICY:	13
NO RETALIATION	14
POLICY:	14
EMPLOYEE AND/OR REPRESENTATIVE ATTESTATION	16

What is a Code of Conduct?

A Code of Conduct is to provide guidance and raise awareness of the ethical, legal and other rules that affect our business. All employees of the Hanumayamma Innovations and Technologies own the responsibility of abiding by the Code of Conduct, following the laws and modeling our values. This same responsibility is expected of temporary workers, consultants, contractors and others who perform services for the Hanumayamma Innovations and Technologies.

The Hanumayamma Innovations and Technologies has established this Code of Conduct to describe appropriate conduct and business practices. This document, along with the related compliance activities are fundamental to establishing an organizational culture of compliance – one that promotes prevention, detection, and resolution of situations that do not conform to the Hanumayamma's policies and procedures, federal and state laws, as well as ethical business practices.

Who the Code of Conduct applies to

The Board of Governors, directors, and employees of the Hanumayamma Innovations and Technologies and, where appropriate, agents, contractors and providers (collectively, "representatives") are expected to conduct the business and affairs of the Hanumayamma Innovations and Technologies consistent with the principles outlined in this Code of Conduct. Employees will be subject to discipline for violating the principles outlined in this Code of Conduct and related policies and procedures, consistent with the Hanumayamma Innovations and Technologies' Human Resources policies.

Our Vision and Mission

The vision and the mission of Hanumayamma Innovations and Technologies, Inc., are to help people & communities with technologies and innovative products. ***We love people and strive to enrich their lives.*** We staunchly believe technologies and innovations for helping humanity and beyond. Since our inception in 2010, we have driven our company with core principles and have build DNA with the vision of creating products that help the humanity. Our products, at the core, demonstrate the best of technologies: Cloud computing, Machine Learning, Data Analytics and Artificial Intelligence for enabling our customers, Dairy Farmers, Healthcare provides, Consumers,

to save and empower lives. Finally, we continue to invent, develop and service our customers with the products that empower and enable them.

Our Values

- **Integrity:** Integrity is the bedrock of how we do business. We strive and adhere to our integrity principles in every aspect and corner of our business.
- **Respect:** We respect each other by encouraging and accepting diverse viewpoints, by being considerate and courteous toward each other and by listening for understanding.
- **Growth:** We show growth by taking risks, embracing and adapting to change, seeking and acting on new opportunities and by measuring our performance.
- **Teamwork:** We foster teamwork by working together to achieve results, recognizing and utilizing each others' strengths, supporting the decisions of the group and communicating collaboratively.
- **Commitment:** We show commitment by taking ownership, being engaged, overcoming barriers and doing what we say with no excuses.

Who to Contact

Obviously, not every area can be fully addressed by our Code of Conduct. If you have a question, or observe something that just doesn't seem right, it is important that you say something.

Please reach out if you have any questions or concerns regarding the Hanumayamma's Code of Conduct and/or compliance with rules, regulations or contracts, or if you suspect or become aware of a breach of the Code of Conduct. You have multiple avenues to reach out with questions, concerns or suspected breaches. Contact us via any of the following options:

Contact your **supervisor** or your business area leader;

Email the Compliance department at compliance@hanuinnotech.com ;

Speak directly with the **CEO**, Anitha Ilapakurti at **(510) 209-6620**;

Contact a **Human Resources** staff person – hr@hanuinnotech.com

Code of Conduct Policies

Professional Ethics

The Hanumayamma Innovations and Technologies, Inc., is committed to the highest standards of business ethics and integrity. The Hanumayamma Innovations and Technologies, Inc., will always fairly and accurately represent itself in all business relationships. The Hanumayamma's Compliance Program and related policies and procedures help ensure that the business activities of the Hanumayamma Innovations and Technologies, Inc., reflect these high standards. As an employee or representative of the Hanumayamma Innovations and Technologies, Inc., your actions are a direct reflection of our business. You are expected to act with honesty and integrity whenever you act on behalf of the Hanumayamma Innovations and Technologies, Inc. We each have an obligation to perform our jobs in a manner that is consistent with this Code of Conduct. Our success as an organization depends largely on our reputation as an honest and ethical company, which requires our individual and collective adherence to that goal to maintain.

Compliance with Laws, Regulations and Contracts

The Hanumayamma Innovations and Technologies, Inc. is committed to conduct all its activities in full compliance with applicable laws, regulations and contractual obligations. One of the purposes of the Compliance Program is to educate Hanumayamma employees about our obligations under the law. Every Hanumayamma Innovations and Technologies, Inc. employee or representative is responsible for ensuring compliance with all laws, regulations, and contractual obligations applicable to their job duties. If there is any doubt as to whether an activity is legal or proper, employee or representative should seek clarification from a supervisor, Human Resources or the Compliance department.

Confidentiality

Every employee of the Hanumayamma Innovations and Technologies, Inc. will protect all confidential information received in the course of their relationship with the Hanumayamma. The Hanumayamma Innovations and Technologies, Inc. will act responsibly by maintaining the confidentiality of farmer, end-

customer, member information and limiting its distribution only to appropriately authorized persons. The Hanumayamma Innovations and Technologies, Inc. will comply with applicable federal and state laws protecting the privacy and security of members' information. In addition, Hanumayamma Innovations and Technologies, Inc. employees will maintain as confidential and proprietary information about the operations and plans of the Hanumayamma, consistent with applicable legal and ethical standards. This policy includes an obligation to report any known or suspected breaches to confidentiality

Confidentiality Examples:

Confidential information includes anything that is not generally known or shared with the public.

- Farmers Identifiable Data
- Farmers Dairy & Operational Data
- Data Science Algorithms
- Enterprise Datasets that are business critical & confidential
- Dairy Cattle Sensor Data
- Business Secrets
- Business Contracts & Install base of our Sensors & Products
- Confidentiality of Our Users
- Sanjeevani Electronic Health Record Data
- All Member Protected Health Information (PHI);
- Information about Hanumayamma Innovations and Technologies, Inc. employees, consultants, vendors, and providers that is not public knowledge; and
- Proprietary information about Hanumayamma Innovations and Technologies, Inc. data security and software licenses, business plans, financial status, and member data that is not public information.

Conflicts of Interest & Disclosures

All employees are expected to conduct their activities to avoid actual or perceived conflicts of interest. A conflict of interest arises when an individual's own interests, whether personal, business, or financial, influences or appears to influence decisions regarding the Hanumayamma Innovations and Technologies, Inc. If a conflict of interest exists, it must be fully disclosed and appropriate action taken consistent with the Hanumayamma's policies.

Potential Conflicts of Interest Examples:

Some examples of potential conflicts include:

- Employment with a competitor, vendor, supplier, client or customer, regardless of the nature of work performed.
- Acceptance of gifts, payments, or services from those soliciting or doing business with the Hanumayamma Innovations and Technologies, Inc.
- Ownership of, or interest in, a company that is a competitor, vendor, or supplier of the Hanumayamma Innovations and Technologies, Inc.
- Serving as a consultant to a current or prospective Hanumayamma Innovations and Technologies, Inc. vendor, client, or supplier.
- Sharing Data Science Algorithms & Datasets
- Unauthorized dissemination of internal & customer sensitive data

It is important to note that all potential conflicts of interest must be fully disclosed to the Hanumayamma Innovations and Technologies, Inc. Compliance Officer to determine whether or not the interests pose an actual conflict.

Protection of Company Assets

The Hanumayamma Innovations and Technologies, Inc. must preserve and protect its assets by promoting the efficient and effective use of its resources. Only authorized employees may use only for business purposes and Hanumayamma Innovations and Technologies, Inc. company assets. All employees should report any situation that could lead to loss, misuse or theft of Company assets to a supervisor or the Compliance Director.

Corporate Asset Examples:

Corporate assets to be protected include, but are not limited to,

- Physical property, such as equipment, furniture, computers, phones, copiers, desks, offices, and meeting rooms;
- Business Secrets documents & discussions
- Intellectual property, such as company records, farmers detail records, healthcare member information, business accounts, pricing strategies, business strategies, financial data, and trademarks;
- Information assets, such as software licenses, cloud computing accounts, mobile data, requirement documents, functional specification documents, software design strategies, patents to be published, internal business critical & technology documents, information and telecommunications systems, and email accounts; and
- Other assets, including the services of Hanumayamma Innovations and Technologies, Inc. attorneys, contractors, consultants, and IT professionals.

Incidental personal use of Hanumayamma Innovations and Technologies, Inc. assets, including computers, telephones, copiers, the internet, etc. is permitted as long as it does not interfere with job performance or Hanumayamma operations or systems, complies with relevant law and ethical standards, and is consistent with Hanumayamma policy. Employees are not entitled to privacy when using Hanumayamma assets. Thus the Hanumayamma Innovations and Technologies, Inc. may monitor email and phone traffic.

Business Inducements

The Hanumayamma Innovations and Technologies, Inc. must conduct all business transactions free from solicitation or receipt of bribes, kickbacks, gifts, favors, or improper incentives. Employees of the Hanumayamma Innovations and Technologies, Inc. may not offer, give, solicit or receive anything of value to induce or bias a referral of business.

Potential Business Inducements Examples:

Some examples of business inducements that are not acceptable include, but are not limited to:

- Acceptance of gifts of money;

- Acceptance of any gift or gratuity in return for purchasing, contracting, or recommending to purchase or contract any item or service from a vendor, client, contractor, or provider; and
- Non-monetary gifts or gratuities from suppliers, vendors, clients, providers, farmers or members, unless unsolicited and infrequent and only if the activities comply with applicable law and (i) have a legitimate business purpose, or (ii) are consistent with Hanumayamma's policy as stated in the Employee Handbook.

Fair Business Dealings

The Hanumayamma Innovations and Technologies, Inc. is committed to achieving its success by fair and ethical means. The Hanumayamma Innovations and Technologies, Inc. prohibits any unethical, non-competitive and illegal business practices. The Hanumayamma Innovations and Technologies, Inc. will deal fairly with its farmers, members, providers, and other business associates. The Hanumayamma Innovations and Technologies, Inc. will not take unfair advantage of anyone through manipulation or concealment of information, abuse of confidential information, misrepresentation of facts or any other unfair business practice. The Hanumayamma Innovations and Technologies, Inc. expects all employees and representatives to be honest whenever acting on behalf of the Hanumayamma Innovations and Technologies, Inc..

Accurate Records

Business records should always be kept in an accurate, true and complete manner. In order to secure the accuracy and reliability of financial records and reports, the Hanumayamma Innovations and Technologies, Inc. has internal control standards and procedures. Accurate business records are important for legal, financial, government, and other reporting obligations of the Hanumayamma Innovations and Technologies, Inc. Records should never be changed, tampered, falsified or withheld. Records should be maintained consistent with relevant record retention policies and legal requirements. Records should only be disposed of in a proper manner, once they are no longer needed or are otherwise not required by law or contract to be maintained.

Employees should assume that all documents, emails, and other correspondence are considered company records and should use discretion and professionalism when creating those records. No employee at the Hanumayamma Innovations and Technologies, Inc. may create or participate in the creation of any record that is meant to mislead or conceal any improper, unethical, or misrepresented activity.

The Hanumayamma Innovations and Technologies, Inc. owns all records that are used in Hanumayamma Innovations and Technologies, Inc. business. The author or keeper of the records does not own the records. Hanumayamma Innovations and Technologies, Inc. employees have no rights to Hanumayamma records, including those that the employee helped to create. All Hanumayamma Innovations and Technologies, Inc. records must remain on Hanumayamma property, approved Cloud Systems or other approved locations. Records may not be stored in employee homes or in other unapproved locations.

Equal Opportunity and Treatment

Policy:

The Hanumayamma Innovations and Technologies Inc. will treat everyone with dignity and with respect for race, color, creed, religion, sex, national origin, disability, marital status, age, sexual orientation and public assistance status. The Hanumayamma Innovations and Technologies Inc. will conduct its employment practices free from discrimination. In addition, good faith efforts are made to reasonably accommodate the physical and mental limitations of special disabled veterans and individuals with disabilities. The Hanumayamma Innovations and Technologies Inc. is committed to maintaining a safe and professional working environment for all employees and to ensuring that all employees are treated with fairness, dignity and respect.

Obligation to Report

Policy:

The Hanumayamma Innovations and Technologies Inc. encourages and expects that all employees of the Hanumayamma Innovations and Technologies Inc. will refuse to participate in and will report suspected violations of the standards presented in this Code of Conduct, related compliance policies, and applicable laws, statutes, rules and regulations. Reporting systems have been established by the Hanumayamma's Compliance Program to provide a means to report violations, without fear of retaliation or retribution, which meet reporting obligations under the law. All violations should be reported consistent with the procedures described in the Compliance Program.

Where to Report:

You have four ways to report any ethical or compliance violations:

- Report the information to your supervisor;
- Report the information to Human Resources;

- Send an email to the Compliance Department:
Compliance@hanuinnotech.com
- Report the information to the Compliance Officer, Anitha Ilapakurti (510) 209-6620; or

No Retaliation

Policy:

The Hanumayamma Innovations and Technologies Inc. is committed to providing employees the opportunity and means to report violations to internal and external parties without fear of retaliation. Anyone who reports a potential violation or cooperates with an investigation is protected against discrimination, intimidation, or retaliation because of his or her actions.

Any employee who retaliates against a person for filing a report or participating in an investigation is subject to corrective action up to, and including, termination of employment.

Hanumayamma Innovations and Technologies Inc.

Employee and/or Representative Attestation

I have received, I have read, I understand and I agree to comply with the Hanumayamma Innovations and Technologies Inc. for Code of Conduct.

Print Employee's/Representative's Name

Employee's/Representative's Signature

Date

Anitha Ilapakurti, CEO

Date



Hanumayamma Innovations and Technologies Inc.
Head quarter: 628 Crescent Terrace, Fremont, CA 94536