



# **INTEGRITY BUILDS TRUST**

**OUR CODE OF CONDUCT**

**SeekhoBecho.com**

RLS Retail Private Limited

# Table of Contents

|   |    |
|---|----|
| <b>A Message from Our Founder</b>                         | 05 |
| <b>Our Values</b>   | 06 |
| <b>How to Use Our Code</b>                                | 10 |
| Why We Have a Code  |    |
| Who is Covered by Our Code                                |    |
| When to Speak Up  |    |
| How to Speak Up   |    |
| Reporting Channels  |    |
| Speak Without Fear of Retaliation                         |    |
| <b>Trust Begins with You</b>                              | 15 |
| Make Ethical Decisions                                    |    |
| The Decision Test   |    |
| Recognize and Avoid Conflicts of Interest                 |    |
| Outside Employment & Financial Interests                  |    |
| Gifts, Entertainment & Hospitality                        |    |
| Employee & Supplier Relationships                         |    |
| <b>Build Trust with Our Employees</b>                     | 21 |
| Create a Safe Place to Work                               |    |
| Respect Each Other — Dignity, Inclusion & Anti-Harassment |    |
| Zero-Tolerance Behaviours                                 |    |
| Work the Right Way — Labour Rights & Fair Pay             |    |
| <b>Build Trust with Our Customers &amp; Learners</b>      | 25 |
| Deliver Quality Products, Courses & Services              |    |
| Protect User Data & Digital Privacy (DPDP Act 2023)       |    |
| Skill-Based Gaming & Platform Integrity                   |    |
| <b>Build Trust in Our Business</b>                        | 29 |
| Compete Fairly — Anti-Competitive Conduct                 |    |
| Never Engage in Bribery or Corruption                     |    |
| Keep Accurate Records & Financial Integrity               |    |
| Use Data and Technology Ethically                         |    |
| Protect Our Intellectual Property                         |    |
| Do Not Misuse Inside Information                          |    |
| Media, PR & External Communications                       |    |
| <b>Fraud, Dishonesty &amp; Criminal Conduct</b>           | 40 |
| <b>Environmental Responsibility</b>                       | 42 |
| <b>Waivers</b>  | 43 |
| <b>Resources &amp; Reporting Channels</b>                 | 46 |
| <b>Definitions</b>  | 47 |
| <b>Employee Acknowledgment &amp; Sign-Off</b>             | 49 |



## A Message from Our Founder

At SeekhoBecho.com, we did not build this company to merely run a business. We built it to change how people learn, earn, and grow - and to prove that ambition and integrity are not opposites. They are, in fact, inseparable.

We are in the business of transformation. Every learner who completes a course, every seller who makes their first sale, every game that rewards skill over chance - these are not small moments. They are the mission. And the mission demands that we earn the trust of every person who interacts with this platform.

Every day, we make decisions that define who we are as a company. The way we conduct ourselves is as important as the results we achieve. Winning the wrong way is not winning - it is a liability. Great outcomes built on compromised ethics are not great outcomes at all.

This Code of Conduct is not a rulebook to memorise and file away. It is a living standard - a compass for every decision you make when no one is watching. It represents our shared commitment to fairness, transparency, and excellence.

We are building a company where the most curious, the most driven, and the most principled people want to be. People who own outcomes rather than just fill roles. People who act with integrity because they believe in it - not because they are being watched.

This Code applies to every person at SeekhoBecho.com - every employee, every leader, every contractor, and every partner. It applies to me as much as it applies to you. Partners and employees who cannot commit to these values do not belong at SeekhoBecho.com.

Please read this Code carefully. Refer to it often. And when you are unsure, do not guess - reach out.

**Richi Vij**

Director & Founder, SeekhoBecho.com  
RLS Retail Private Limited



# Our Values

Our values are not aspirations pinned to a wall. They are the operating principles behind every hire, every product decision, every policy, and every interaction. They define who we are – and who we refuse to become.



## 1. Think Beyond Limits

What We Believe: We do not accept 'it cannot be done.' We challenge what exists and build what does not. We are fearless in the pursuit of disruptive ideas. We change the paradigm.

### How We Do It:

- Challenge established standards and push every boundary
- Innovate continuously and find solutions others cannot see
- Be fearless in trying what is radically new – failure is data, not defeat



## 2. Bias for Action

What We Believe: Great ideas have no value until they are executed. We have a fierce sense of urgency. We move fast, we decide with available data, and we make things happen.

### How We Do It:

- Take initiative and drive results with measurable impact
- Make speedy and wise decisions with the information available
- Do not wait for perfect conditions – create them



## 3. Learner & Customer First

What We Believe: Our learners and customers are the reason we exist. Every feature, every product, every policy must serve them. We look at the world from their point of view – always

### How We Do It:

- Continuously strive to understand what our learners and customers truly need
- Validate success through their actions and outcomes, not our assumptions
- Go deep into every problem and resolve root causes, not symptoms



## 4. Integrity

What We Believe: We do what is right, and we do what we say we will do. No success achieved the wrong way is meaningful at SeekhoBecho.com. Integrity is the price of entry, not a differentiator.

### How We Do It:

- Act in accordance with this Code and actively consider the ethical implications of every decision
- Recognise the impact of our words and actions, and own the outcome fully
- Safeguard all proprietary, confidential, and personal information
- Be honest and transparent – internally and externally – at all times



## 5. Inclusion

**What We Believe:** We value the uniqueness in everyone. We build a company where talent from any background, identity, or experience can thrive, contribute, and grow

### How We Do It:

- Treat everyone with dignity and embrace their uniqueness regardless of age, gender, religion, language, caste, disability, sexual orientation, or professional background: Respect for Diversity
- Actively seek diverse perspectives, create environments where every one can be themselves, and challenge our own unconscious biases: Foster Inclusion & Belonging
- Be a visible champion for inclusion and diversity initiatives – within the company and in the broader ecosystem: Champion I&D



## 6. Make It Happen

**What We Believe:** Ownership is not a title – it is a mindset. We hold ourselves and our teams accountable for results, not just for effort.

### How We Do It:

- Collaborate across functions and disciplines to drive unified outcomes
- Focus on timely, high-quality output – never cut corners on either
- Hold yourself and your team members accountable for every commitment made



# How to Use Our Code



# Why We Have a Code

SeekhoBecho.com is a multi-vertical company – operating in skill-based gaming, e-commerce, education, content creation, technology, and more. We make thousands of decisions every day, and the right course of action is not always immediately obvious. This Code of Conduct exists to help every person at SeekhoBecho.com make decisions that earn and build trust.



**Build trust with our employees**



**Build trust with our customers**



**Build trust in our business**

Our Code reinforces that SeekhoBecho.com is committed to complying with all applicable laws and regulations in India. When local practices are less strict than our Code, our Code still applies. If you believe our Code conflicts with a legal requirement, contact HR or Legal immediately

## Who is Covered by Our Code

This Code applies to all employees of SeekhoBecho.com and RLS Retail Private Limited – full-time, part-time, probationary, contractual, and interns. It also applies to directors, senior leadership, content creators under agreement, platform moderators, vendors, influencers, affiliates, and business partners operating on our behalf.

Employees and partners who violate this Code may be subject to disciplinary action, up to and including immediate termination of employment or contract and initiation of legal proceedings

## When to Speak Up

Building trust requires that we do the right thing and speak up when we have questions or concerns. You must speak up if you see, suspect, or are told about activity that violates our Code, our policies, or the law. Do not stay silent. Unethical behaviour — when ignored — erodes everything we are building.

'I wasn't sure if it was my place to say something' is never an acceptable reason for silence at SeekhoBecho.com.

## How to Speak Up

Most concerns can be reported to your Manager, HR, or Ethics & Compliance directly. The following categories must be reported immediately to Ethics & Compliance:

- Any act or suspicion of bribery, corruption, or violation of our Anti-Bribery Policy
- A senior leader or direct report to the Director potentially violating this Code
- Falsification of financial records or interference with internal controls
- Data breach or suspected unauthorised access to personal or confidential data
- Sexual harassment complaint under POSH Act 2013

### Reporting Channels — SeekhoBecho.com

- Talk directly: Your Manager, next-level Manager, or HR Business Partner
- Email Ethics & Compliance: [compliance@seekhobecho.com](mailto:compliance@seekhobecho.com)
- Email HR directly: [hr@seekhobecho.com](mailto:hr@seekhobecho.com)
- Anonymous reporting: Available through Ethics & Compliance — identity protected to the maximum extent permitted by law
- POSH complaints: Internal Complaints Committee (ICC) — contact HR for ICC member details

## Speak Without Fear of Retaliation

SeekhoBecho.com has zero tolerance for retaliation against any employee who reports a concern, raises a complaint, or participates in an investigation in good faith. Any person who retaliates — directly or indirectly — against a reporting employee will face immediate disciplinary action, including termination.

Reporting an issue honestly will not get you in trouble, even if you make an honest mistake. Knowingly reporting false information to harm another person, however, is a violation of this Code and will result in disciplinary action.

All reports to Ethics & Compliance are treated with the highest level of confidentiality. We investigate all reports of misconduct seriously and impartially. If you are asked to participate in an investigation, cooperate fully and give complete, honest answers.

# Integrity Builds Trust

Trust Begins  
**With you**



Build Trust with Our  
**Employees**



Build Trust with Our  
**Customers & Learners**



Build Trust in Our  
**Business**



# Trust Begins with You



# Make Ethical Decisions

We build trust when we make decisions consistent with our values and take full responsibility for our actions. Being ethical means doing the right thing even when no one is watching – and at SeekhoBecho.com, we do not need to be watched to do right

## Before you act, ask these questions

- Is it legal under Indian law?
- Is it consistent with our values and this Code?
- Is it in SeekhoBecho.com's best interest?
- If it became public knowledge, would I be proud of it?
- If the answer to any of these is 'No' or 'I am not sure' – stop. Reach out.

## Role of Managers & Leaders

- Set expectations consistent with our values – daily
- Listen actively to employees who seek advice or raise concerns
- Take every report of misconduct seriously and ensure it is properly handled
- Stand firm against intimidation, harassment, and retaliation – always
- Lead by example – if not you, then who?



## Integrity in Action

- Follow the law: Know the laws that apply to your role and our business
- Know our Code and live our values: Complete all required training and sign the acknowledgment
- Act in SeekhoBecho.com's best interest: Never allow personal interests to influence business decisions you make in your role
- Be honest: Be transparent in all interactions – internally and externally
- Lead by example: Talk about our Code and our values with your colleagues
- When in doubt – reach out: Your Manager, HR, or Ethics & Compliance are always available

## Trust Begins with You

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## Recognize and Avoid Conflicts of Interest

A conflict of interest arises when personal interests – financial, relational, or otherwise – interfere with, or appear to interfere with, our obligations and objectivity in our roles at SeekhoBecho.com. We put SeekhoBecho.com's interests before personal interests when making business decisions.

If you realize a situation could influence your ability to make objective decisions – or could appear to do so – you must immediately inform your Manager, HR, or Ethics & Compliance before proceeding.

## Outside Employment & Financial Interests

- Do not work for a competitor, similar platform, or supplier while employed at SeekhoBecho.com without prior written approval
- Do not use your role at SeekhoBecho.com to promote a personal side business or exploit company resources for personal gain
- Do not pursue business opportunities discovered through your work here for personal benefit – these belong to SeekhoBecho.com unless formally released in writing
- Do not hold substantial financial interests in competitor organisations or vendors over which you have influence

## Gifts, Entertainment & Hospitality

- Decline all gifts, entertainment, or any benefit from suppliers, vendors, or partners if you work with or can influence our relationship with them
- Never accept gifts from government officials under any circumstances, regardless of value
- All gifts received above INR 1,000 in value must be disclosed to Ethics & Compliance within 5 business days
- Our policy applies to all forms of benefit – cash, vouchers, meals, travel, tickets, subscriptions, or any item of value
- Our policy applies everywhere we do business – custom or culture in a particular context does not create an exception

## Employee & Supplier Relationships

**Family Members:** Do not supervise, hire, or influence the performance assessment, salary, or working conditions of a family member. If a family member enters your reporting line due to any organisational change, disclose immediately to HR.

**Romantic Relationships:** Do not have a romantic relationship with another employee if they are in your chain of command or if you have any influence over their conditions of employment, performance rating, or career advancement.

**Supplier Relationships:** If a close friend, family member, or romantic partner works for a vendor or supplier over which you have influence, disclose this to HR or Ethics & Compliance before participating in any decisions involving that supplier.

## What if?

**I received a gift from a vendor I sometimes interact with professionally. It was a diwali hamper worth approximately INR 1,500. Can I keep it?**

No. You must disclose this to Ethics & Compliance within 5 business days. If you have any direct or indirect influence over our relationship with that vendor, the gift must be returned or surrendered. When in doubt, always disclose first.

**When in doubt — reach out.** Speak to your Manager, HR, or Ethics & Compliance. If you need to report a concern: [hr@seekhobecho.com](mailto:hr@seekhobecho.com) or [compliance@seekhobecho.com](mailto:compliance@seekhobecho.com)



## Build Trust with Our Employees



## Create a Safe Place to Work

### Employee & Supplier Relationships

SeekhoBecho.com is committed to a workplace that is physically safe, mentally healthy, and free from fear and intimidation. Every employee has the right to a dignified, secure working environment. If you see something that could put anyone at risk – report it immediately.

#### Integrity in Action – Workplace Safety

- Stop a task if conditions are unsafe and report the hazard before continuing
- Do not work under the influence of alcohol, drugs, or any intoxicant – at work or during work hours
- Follow all safety procedures relevant to your role. For production and studio environments, follow the Shoot Safety SOP
- Zero tolerance for violence, threats, or intimidating behaviour – report immediately to your Manager or HR
- Follow all applicable health, safety, and labour laws for your role and function
- Know what to do in an emergency – familiarise yourself with evacuation procedures for your workspace

### Respect Each Other – Dignity, Inclusion & Anti-Harassment

SeekhoBecho.com is committed to a workplace that is physically safe, mentally healthy, and free from fear and intimidation. Every employee has the right to a dignified, secure working environment. If you see something that could put anyone at risk – report it immediately.

## SeekhoBecho.com does not tolerate discrimination or harassment based on:

Race • Caste • Colour • Ancestry • Ethnicity • Religion • Sex • Pregnancy • National Origin • Age • Disability • Marital Status • Sexual Orientation • Gender Identity or Expression • Language • Ability • Any Other Protected or Legally Recognised Status

### Integrity in Action — Respect & Inclusion

- Treat others with dignity: Be fair and respectful to all employees, customers, vendors, and partners. Value differences and listen to diverse points of view
- Hire and promote the right way: All decisions on hiring, retention, and promotion must be based entirely on qualifications, skills, performance, and merit
- Prevent harassment: Set the right tone with your team. Verbal, physical, or visual conduct of a sexual nature is never acceptable
- Lead by example: Be inclusive in your words and actions. Understand how your behaviour and language are perceived by others
- Speak up: Never tolerate harassment or discrimination. Report immediately to your Manager, HR, or Ethics & Compliance

## Zero-Tolerance Behaviours

The following constitute serious misconduct and will result in immediate disciplinary action, which may include termination and legal proceedings:

- Unwelcome sexual advances, remarks, requests for sexual favours, or any conduct of a sexual nature
- Slurs, derogatory comments, or offensive jokes targeting any protected characteristic
- Displaying, sharing, or circulating graphic, insulting, or hostile material targeting any group or individual
- Bullying, threatening, coercing, or intimidating behaviour — in person, on calls, or digitally including WhatsApp, email, or social media
- Retaliating against any person who has reported harassment, discrimination, or any ethics concern in good faith

- Any form of physical violence or credible threat of violence in or connected to the workplace

**POSH Act Compliance:** SeekhoBecho.com fully complies with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. We have constituted an Internal Complaints Committee (ICC). Any complaint under POSH must be submitted in writing to the ICC through HR within 3 months of the incident.

**When in doubt — reach out.** Speak to your Manager, HR, or Ethics & Compliance. If you need to report a concern: [hr@seekhobecho.com](mailto:hr@seekhobecho.com) or [compliance@seekhobecho.com](mailto:compliance@seekhobecho.com)

## Work the Right Way — Labour Rights & Fair Pay

Our employees are our greatest asset. SeekhoBecho.com pays accurately, on time, and in full compliance with applicable labour laws. We respect human rights and will never use or knowingly benefit from underage, forced, or bonded labour anywhere in our business or supply chain.

### Integrity in Action — Labour & Employment

- Verify eligibility: HR must verify and document the identity and work authorisation of every new employee before their start date
- Work only when compensated: Do not perform work without pay. Know and follow all policies on overtime, leave, and compensatory time
- Overtime compliance: SeekhoBecho.com complies with the Shops & Establishments Act for overtime pay. No employee may be required to work beyond mandated hours without proper compensation
- Choose partners carefully: Only engage suppliers, vendors, and contractors who have passed our approval process and commit to our labour standards
- Know your rights: Every employee has the right to understand their salary structure, leave entitlements, and working conditions

# Build Trust with Our Customers & Learners



# Deliver Quality Products, Courses & Services

## Deliver Quality Products, Courses & Services

Our learners, players, sellers, and customers trust SeekhoBecho.com to deliver products and services that are honest, high-quality, and genuinely valuable. That trust is our most valuable business asset. Every team member — regardless of role — shares responsibility for protecting it.

### Integrity in Action — Quality & Customer Trust

- Report product or service issues immediately: If you become aware of any safety, quality, or accuracy issue with any product, feature, or content, report it immediately to your Manager and the relevant team lead
- Never misrepresent: Do not misrepresent a product, feature, service, pricing, or platform capability in any customer-facing communication — written, verbal, or visual
- Follow compliance requirements: Understand the legal and regulatory requirements applicable to your role, including Consumer Protection Act 2019
- Course accuracy: All educational content must be reviewed for factual accuracy before publication. Do not publish unverified or misleading information
- Speak up for users: If you believe a product, feature, or piece of content could harm a user — say so. Internal concerns are better than external consequences

### Protect User Data & Digital Privacy (DPDP Act 2023)

When our users, learners, and business partners share data with us, they are trusting us to protect it, use it responsibly, and respect their privacy. SeekhoBecho.com is committed to full compliance with India's Digital Personal Data Protection Act, 2023 (DPDP Act) and all applicable data protection regulations.

## Integrity in Action – Data Protection

- Collect only what you need: Do not collect, store, or process personal data beyond what is strictly necessary for the stated, disclosed purpose
- Transparency first: Always ensure users are clearly informed of what personal data is being collected and why – before collection begins
- Purpose limitation: Use personal data only for the purpose for which it was collected. No unexpected, undisclosed, or unauthorised uses
- Protect all data: Safeguard personal and business data from unauthorised access or disclosure. Use only approved systems and tools for data storage
- Report breaches immediately: Any known or suspected data breach or unauthorised access must be reported to IT and Ethics & Compliance within 2 hours of discovery. DPDP Act 2023 requires notification to the Data Protection Board within 72 hours
- Follow our data policies: Know and follow all DPDP Act compliance guidelines, our Privacy Policy, and all internal data handling SOPs relevant to your role

## What if?

I accidentally shared customer contact data in a WhatsApp group that included an external person. What do I do?

Report it immediately to your Manager and the IT/Data team. Do not wait. Internal incidents must be escalated within 2 hours. Data breaches affecting personal data may require regulatory notification within 72 hours under the DPDP Act 2023. Delay can significantly worsen legal consequences.

## Skill-Based Gaming & Platform Integrity

SeekhoBecho.com classifies all its games as skill-based in accordance with the Public Gambling Act, 1867. This is a foundational legal and operational positioning that every employee must understand and uphold.

- All games on the SeekhoBecho.com platform are decided by user skill, knowledge, timing, strategy, and engagement – not by chance
- No employee may represent, describe, market, or position any SeekhoBecho.com game as a gambling or chance-based product, internally or externally
- The Coin Economy is non-monetary and non-withdrawable. Coins are internal engagement units with no cash value, no legal tender status, and no RBI/PSS classification
- Any suspected manipulation of game outcomes, coin systems, reward mechanisms, or leaderboards must be reported to Ethics & Compliance immediately

# Build Trust in Our Business



# Compete Fairly – Anti-Competitive Conduct

We believe that success earned through fair and honest competition is the only success worth having. Anti-competitive behaviour harms our users, damages our reputation, and violates the law. We compete on the strength of our products, content, and people – nothing else.

## Integrity in Action – Fair Competition

- Never share sensitive competitive information: Do not share pricing, costs, strategy, roadmap, or other confidential information with competitors
- No anti-competitive agreements: Never agree on price, terms, market allocation, or product strategy with competitors or their representatives
- Handle supplier information carefully: Do not seek or pass along confidential competitor information through our suppliers. Do not share confidential supplier information with other suppliers
- Accurate advertising: Always be truthful in all pricing, marketing, and advertising communications
- If uncertain: If you are ever unsure whether a conversation, agreement, or action could be anti-competitive, contact Legal immediately before proceeding

## Never Engage in Bribery or Corruption

SeekhoBecho.com competes fairly and honestly everywhere we do business. We never attempt to gain any advantage through bribery or corruption – and we do not tolerate it in any form, from any person acting in any capacity on our behalf

## What is bribery?

- Offering, paying, receiving, or authorising payment of money or anything of value to improperly influence any decision or action
- Applies to government AND non-government parties equally
- Bribes are not limited to cash – gifts, travel, meals, entertainment, employment offers, and charitable donations can all constitute bribes
- The intent to improperly influence is what makes a payment a bribe

## Bribery Red Flags

- Excessive or unusual commission payments
- Large or unexplained discounts with no business rationale
- Vague consulting agreements with no defined deliverables
- Requests for lavish entertainment or luxury gifts
- Payments through intermediaries with no clear business purpose
- A government official 'suggesting' a specific service provider

## Integrity in Action – Anti-Bribery

- Do not offer or accept bribes: Bribery of anyone, at any organisation, at any level, for any reason is simply wrong and is grounds for immediate termination
- Third parties must not pay bribes: Anyone acting on our behalf may not offer, give, or receive a bribe. If the only way to complete a transaction is through bribery, the transaction does not happen
- Government engagement: Obtain prior written approval from Ethics & Compliance and Legal before entering any agreement with a government entity or engaging a third-party intermediary for government dealings
- Report immediately: Any allegation or attempt of bribery – received or witnessed – must be reported to Ethics & Compliance at [compliance@seekhobecho.com](mailto:compliance@seekhobecho.com) without del

## What if?

**A government official indicated our application would be processed significantly faster if we made a 'facilitation payment' of INR 5,000. What do I do?**

Do not make any payment. This constitutes bribery under the Prevention of Corruption Act regardless of the amount, framing, or common practice. Document the interaction with date, time, name, and what was said. Report it immediately to Ethics & Compliance. We do not allow improper payments to influence any official decision under any circumstances.

**When in doubt – reach out.** Speak to your Manager, HR, or Ethics & Compliance. If you need to report a concern: [hr@seekhobecho.com](mailto:hr@seekhobecho.com) or [compliance@seekhobecho.com](mailto:compliance@seekhobecho.com)

## Never Engage in Bribery or Corruption

Honest and accurate financial and operational records are the foundation of good governance, strategic decision-making, and legal compliance. Every record we create – whether a payroll sheet, expense claim, platform transaction log, or revenue report – must be truthful, complete, and properly authorised

## Integrity in Action – Record Accuracy

- Never falsify a record: Never hide, alter, fabricate, or destroy any business record, financial data, transaction, or document for any reason
- Your responsibility: Even if you do not prepare financial reports, you are responsible for the accuracy of every record you create in your role
- Approvals required: Always obtain required approvals before incurring expenses or entering financial commitments on behalf of the company
- Report irregularities: If you suspect any record has been falsified or any internal financial control overridden, report it to Ethics & Compliance immediately
- Records retention: Follow our Records Retention Policy for the proper storage and disposal of company records. Do not delete or destroy records under a legal hold

more  
Shopify  
Website  
₹3.5 Lakh/  
Month

Jo aaj seekhega,  
woh kal kamaayega!

Ab aap bhi apna dropshipping business  
start kar sakte ho bina stock ke,  
investment ke.

lo, aur  
ein badlo



## What if?

**A colleague told me they adjust monthly revenue figures so strong months can help cover weaker months for reporting purposes. Is this acceptable?**

No – this is financial misrepresentation and is never acceptable regardless of the amount or intent. It is dishonest, potentially illegal under Companies Act 2013, and directly contrary to our values. Report this to Ethics & Compliance immediately.

**When in doubt – reach out.** Speak to your Manager, HR, or Ethics & Compliance. If you need to report a concern: [hr@seekhobecho.com](mailto:hr@seekhobecho.com) or [compliance@seekhobecho.com](mailto:compliance@seekhobecho.com)

### Use Data and Technology Ethically

When employees, customers, learners, and partners share data with us, we understand the trust that places in us. We are committed to using technology and data in ways that are ethical, lawful, transparent, and consistent with what people who shared it with us would expect.

### Integrity in Action – Data & Technology Ethics

- Respect the trust people place in us: Handle all technology and personal information with the care that its sensitivity demands
- Transparency: When collecting any personal data, ensure the person is clearly informed of what is being collected and for what specific purpose
- Purpose limitation: Do not use personal or business data for any purpose not explicitly disclosed to the individual. No unexpected, unexplained, or unauthorised uses
- AI tools: Only use AI tools approved by the company for work purposes. Never input customer personal data, confidential business information, unreleased product details, or proprietary code into any external AI system (including ChatGPT, Claude, Gemini, etc.) without explicit written approval
- Report breaches: Any known or suspected data breach or unauthorised access must be reported to IT and Ethics & Compliance immediately
- Follow our policies: Know and follow all DPDP Act compliance requirements and internal data handling guidelines applicable to your role

## Protect Our Intellectual Property

SeekhoBecho.com's intellectual property — including our platform, code, content, courses, games, brand, designs, trade secrets, processes, and methodologies — is among our most valuable strategic assets. Every employee, contractor, and partner must treat it accordingly.

### Integrity in Action — IP Protection

- All work product belongs to SeekhoBecho.com: All inventions, code, content, designs, courses, ideas, and materials created in the course of your employment or engagement belong entirely to SeekhoBecho.com — regardless of where or when they were created
- This obligation survives termination: Your IP obligations continue even after you leave the company
- Respect third-party IP: Never use, reproduce, distribute, or adapt the intellectual property of others without proper authorisation or licence
- No open-source without approval: Using open-source components in company products requires prior written approval from the Technology team to ensure licence compatibility
- Report misuse: If you become aware of misuse of SeekhoBecho.com's intellectual property — internally or externally — report it immediately

## What if?

**I created course content, a logo design, and some code during my employment. When I leave, can I use these materials for my personal or new venture?**

No. All work product, content, code, designs, and materials created during your employment or engagement belong entirely to SeekhoBecho.com. Using any such material for personal or external purposes — even after leaving — is a violation of your Employment Agreement and NDA, and constitutes misappropriation of intellectual property.

## Do Not Misuse Inside Information

As a SeekhoBecho.com employee, you may have access to information about our business, products, strategies, financials, or platform data that has not been made public. This information belongs to the company and must be treated with the highest level of confidentiality.

### Integrity in Action — Inside Information

- Do not use inside information for personal advantage: Do not use non-public information about SeekhoBecho.com — financials, new features, partnerships, strategic plans, acquisition discussions — to benefit yourself, your family, or any external party
- Need-to-know principle: Share confidential business information only with employees who genuinely need it for their work
- No external sharing: Do not share non-public information with anyone outside SeekhoBecho.com — including family members, friends, or investors — even in casual conversation
- Be situationally aware: When discussing confidential information, ensure you cannot be overheard by unauthorised parties

## What if?

**I know we are about to announce a major new brand partnership that will significantly expand our platform. Can I quietly tip off a contact in the industry before the official announcement?**

No. Sharing non-public business information with any external party before its official announcement is a serious violation of your confidentiality obligations and may constitute a criminal offence. Do not share it, regardless of your relationship with the contact or how 'harmless' it may seem.

## Media, PR & External Communications

SeekhoBecho.com speaks with one voice in public. Unauthorised public statements about the company – however well-intentioned – can cause significant legal, reputational, and competitive damage.

- Only designated spokespersons authorised in writing by the Founder/Director may make public statements, give interviews, or respond to media enquiries on behalf of SeekhoBecho.com
- If you are contacted by media or journalists about SeekhoBecho.com in any capacity, do not comment. Immediately direct them to [hr@seekhobecho.com](mailto:hr@seekhobecho.com) and notify your Manager
- Social media posts that disclose confidential company information, make claims about unreleased products, or could be misrepresented as official company positions require prior written approval
- Crisis situations – any significant negative event, data breach, regulatory inquiry, or legal proceeding – must be immediately escalated to the Founder and Legal team. Do not comment publicly





# Fraud, Dishonesty & Criminal Conduct

SeekhoBecho.com is built on trust. We place immense trust and confidence in every person who joins this organisation. In return, we expect absolute honesty, transparency, and ethical conduct in everything you do. Fraud, dishonesty, and criminal conduct are incompatible with our values and will not be tolerated under any circumstances. SeekhoBecho.com prohibits all forms of fraud, dishonesty, and criminal conduct in connection with company business – including taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair or deceptive practice.

## Integrity in Action – Fraud Prevention

- Act ethically and honestly in everything you do: Any use of fraudulent or dishonest tactics is a fundamental violation of the trust this company places in you
- Do not manipulate, misrepresent, or conceal: Never alter facts, falsify records, or conceal information to gain an unfair advantage for yourself or others
- No theft or misappropriation: Never take company property, funds, data, or intellectual property for personal use or for the benefit of any outside party
- No abuse of company systems: Never use company IT systems, platforms, or data to conduct personal transactions, unauthorised activities, or illegal acts
- Report immediately: If you detect or suspect fraud, dishonesty, or criminal conduct by any employee or anyone doing business with SeekhoBecho.com, report it to Ethics & Compliance at [compliance@seekhobecho.com](mailto:compliance@seekhobecho.com) without delay
- Prosecution: SeekhoBecho.com will fully cooperate with law enforcement and regulatory authorities to prosecute any act of fraud, dishonesty, or criminal conduct

# Environmental Responsibility

SeekhoBecho.com is committed to conducting business in a manner that respects the environment and complies with all applicable environmental laws and regulations in India. While we are primarily a digital and technology platform, our operations – offices, events, production shoots, and logistics – have an environmental footprint that every employee shares responsibility for.

## Integrity in Action – Environmental Responsibility

- Comply with all environmental laws: Ensure that all company activities comply with applicable environmental laws and guidelines in Haryana and India
- Reduce waste in the office: Follow waste segregation practices, reduce single-use plastics, and minimise unnecessary printing and resource consumption
- Production shoots & events: Dispose of props, packaging, and materials responsibly after every production or company event
- Report environmental hazards: If you believe an environmental hazard exists on company premises – including improper disposal of electronic waste or hazardous materials – report it to your Manager immediately
- Digital responsibility: Be mindful of data storage waste, unnecessary server loads, and energy consumption associated with our technology infrastructure
- Sustainability mindset: Look for opportunities to reduce our environmental footprint in your daily work – small actions collectively create meaningful impact

**When in doubt – reach out.** Speak to your Manager, HR, or Ethics & Compliance. If you need to report a concern: [hr@seekhobecho.com](mailto:hr@seekhobecho.com) or [compliance@seekhobecho.com](mailto:compliance@seekhobecho.com)

## Situation

## What must I do?

**I discover a colleague submitting fake expense claims to finance**

Do not confront them directly. Report immediately to Ethics & Compliance at [compliance@seekhobecho.com](mailto:compliance@seekhobecho.com). This is fraud and will result in termination and legal action.

**I am asked by my manager to inflate sales numbers in our weekly report**

Refuse. No one – including senior managers – has authority to ask you to falsify records. Report this to Ethics & Compliance or the Founder directly. This is financial fraud.

**I suspect a vendor is billing for services not delivered**

Raise it with Finance and Ethics & Compliance immediately. Do not approve or process the payment. Document everything.

**I accidentally made an error in a report that overstated revenue**

Disclose it immediately to your manager and Finance. Honest mistakes handled promptly are not misconduct. Cover-ups are.

**No one at SeekhoBecho.com** – No one at SeekhoBecho.com – not a manager, not a senior leader, not the Founder – has the authority to instruct you to do something illegal, fraudulent, or dishonest. If anyone does, it is your right and obligation to refuse and report it.

**When in doubt – reach out.** Speak to your Manager, HR, or Ethics & Compliance. If you need to report a concern: [hr@seekhobecho.com](mailto:hr@seekhobecho.com) or [compliance@seekhobecho.com](mailto:compliance@seekhobecho.com)

# Waivers

Every employee, officer, director, contractor, and partner is required to comply with this Code at all times. SeekhoBecho.com does not routinely grant exceptions to this Code.

In rare and exceptional circumstances, a specific provision of this Code may be waived. The following process governs all waiver requests:

**Who may request a waiver:** Any employee may submit a written waiver request to Ethics & Compliance explaining the specific provision, the business justification, and the proposed alternative safeguards

**Who approves waivers:** For employees and managers: Ethics & Compliance in consultation with HR. For senior leaders and Heads of Department: waiver request may be self-approved

**When waivers may be granted:** Only when the facts clearly show that the spirit and intent of the Code are preserved, no legal obligation is violated, and adequate alternative safeguards are in place

**Waivers do not set precedent:** Each waiver request is evaluated on its specific facts. A waiver granted in one situation does not create an entitlement to a waiver in any other situation

**Waivers must be in writing:** All granted waivers must be documented in writing, signed by the approving authority, and retained in the employee's HR file

**Disclosure:** Material waivers involving senior leadership will be disclosed to the extent required by applicable law

## What if?

**I believe a specific clause in the Code creates an unfair outcome in my unique situation. What should I do?**

Submit a written waiver request to Ethics & Compliance at [compliance@seekhobecho.com](mailto:compliance@seekhobecho.com) before taking any action. Describe the situation, the specific Code provision, and why you believe a waiver is warranted. Acting without an approved waiver is a Code violation regardless of your intent.

**Important:** This Code represents the minimum standard of conduct expected at [SeekhoBecho.com](http://SeekhoBecho.com). Specific departments, roles, and engagement agreements may impose additional and more stringent obligations. Where a more specific policy applies to your role, that policy governs — but it never replaces this Code.

**When in doubt — reach out.** Speak to your Manager, HR, or Ethics & Compliance. If you need to report a concern: [hr@seekhobecho.com](mailto:hr@seekhobecho.com) or [compliance@seekhobecho.com](mailto:compliance@seekhobecho.com)



# Resources & Reporting Channels

SeekhoBecho.com is committed to making ethics reporting easy, accessible, and safe. Use any of the following channels:

|                                      |  |
|--------------------------------------|--|
| <b>Talk to</b>                       | Your Manager, next-level Manager, HR Business Partner, or Ethics & Compliance                                    |
| <b>Ethics &amp; Compliance email</b> | compliance@seekhobecho.com   |
| <b>HR direct</b>                     | hr@seekhobecho.com   |
| <b>POSH / ICC complaints</b>         | Submit to ICC through HR   hr@seekhobecho.com  |
| <b>Website</b>                       | www.seekhobecho.com/compliance   |
| <b>Grievance Officer</b>             | As per IT Rules 2021 - details available on website and  |
| <b>Anonymous reporting</b>           | Available through Ethics & Compliance – identity protected to the maximum extent permitted by law                |
| <b>Response commitment</b>           | All reports acknowledged within 48 hours.<br>Investigations completed within 30 days (extendable for complexity) |

## Integrity Builds Trust

SeekhoBecho.com | RLS Retail Private Limited  
 Plot-76-D, Phase IV, Udyog Vihar, Sector 18, Gurugram, Haryana - 122001  
 compliance@seekhobecho.com | www.seekhobecho.com

# Definitions

The following key terms are used throughout this Code of Conduct:

**Code of Conduct / this Code** – This document – SeekhoBecho.com Code of Conduct – as amended from time to time

**Company / SeekhoBecho.com** – RLS Retail Private Limited, operating as SeekhoBecho.com, including all its divisions, projects, and platforms

**Director / Founder** – Richi Vij, Director, RLS Retail Private Limited

**Employee** – Any individual employed by RLS Retail Private Limited on a full-time, part-time, probationary, contractual, or internship basis

**Partner / Third Party** – Any supplier, vendor, content creator, influencer, affiliate, contractor, or business partner operating on behalf of or with SeekhoBecho.com

**HR / People Team** – The Human Resources function of RLS Retail Private Limited

**Ethics & Compliance** – The function responsible for ethics oversight, policy compliance, and investigation of Code violations – reachable at [compliance@seekhobecho.com](mailto:compliance@seekhobecho.com)

**ICC / Internal Complaints Committee** – The Internal Complaints Committee constituted under POSH Act 2013 for handling sexual harassment complaints

**Confidential Information** – All non-public information about SeekhoBecho.com's business, financials, strategy, technology, customer data, platform data, and intellectual property

**Personal Data** – Any information that identifies or can identify a natural person – as defined under the Digital Personal Data Protection Act, 2023

**DPDP Act** – Digital Personal Data Protection Act, 2023

**POSH Act** – Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

**Conflict of Interest** – Any situation in which personal interests interfere – or appear to interfere – with professional obligations to SeekhoBecho.com

**Inside Information** – Non-public information that could materially affect business decisions, valuations, or competitive positioning if disclosed

**Bribery** – Offering, providing, receiving, or soliciting anything of value to improperly influence a decision, action, or omission

# Employee Acknowledgment & Sign-Off

I, the undersigned, hereby acknowledge and confirm the following:

1. I have received, read, and fully understood the SeekhoBecho.com Code of Conduct.
2. I understand that this Code applies to me at all times during my employment or engagement with RLS Retail Private Limited, operating as SeekhoBecho.com.
3. I agree to comply with all provisions of this Code and all related company policies, now and as they may be updated from time to time. I will be notified of material updates.
4. I understand that violation of this Code may result in disciplinary action, up to and including immediate termination of employment and initiation of legal proceedings against me.
5. I confirm that I have disclosed, or will promptly disclose, any existing or potential conflicts of interest to HR or Ethics & Compliance.
6. I understand my obligation to report any violation or suspected violation of this Code or applicable law through the appropriate channels, and that I am protected from retaliation for doing so in good faith.
7. I acknowledge that this Code is an independent binding document forming part of the terms and conditions of my employment at SeekhoBecho.com.
8. I confirm that I have not been coerced or pressured into signing this acknowledgment, and that I sign it voluntarily and with full understanding of its contents.

**Employee Name (Print):**

**Employee ID:**

**Designation:**

**Department:**

**Date of Joining:**

**Date of Signing:**

**Signature:**

**Witness / HR Representative:**

This acknowledgment form must be signed on or before the employee's first day of work at SeekhoBecho.com. A signed copy will be retained in the employee's personnel file in the HR Portal. A copy will be provided to the employee upon request