

TOWER VISION INDIA PRIVATE LIMITED

CODE OF CONDUCT FOR EMPLOYEES

A MESSAGE FROM THE COO

Dear Colleagues,

As one of India's leading passive infrastructure company, Tower Vision India Private Limited (“**Tower Vision/ Company**”) has a significant role to play in enriching people's lives. It has been the Company’s consistent intent that we manage our business carefully and responsibly, which is why we ensure that we maintain the highest ethical standards in our conduct.

Each of us is a representative of the Company and thus our conduct reflects the values and ethics with which the Company operates. It is our conduct that determines our ethics and integrity which in turn help us maintain the trust and faith of our stakeholders and thrive.

Keeping the above in mind, we hereby introduce you to Tower Vision’s revised Code of Conduct (“**Code**”). All Employees (as defined below) of the Company are expected to read and understand this Code, and follow it both in spirit and letter, always bearing in mind that each of us has a personal responsibility to incorporate, to encourage other Employees to incorporate, the principles of the Code and values into our work, and be responsible for creating a culture of high ethical standards, integrity, compliance, and maintain a work environment that encourages other employees to raise concerns, if any.

It is our view that the successful upholding of this Code depends on each Employee having necessary appreciation for the legal and ethical boundaries of his/her own actions and readiness to let these actions be measured in terms of legal and ethical standards.

Applicability

The Code applies to (a) all the employees (both on roll and off roll), (b) the Board of Directors and (c) such other people who are engaged with the Company as Consultants and/or involved in managerial and/or supervisory roles.

The aforesaid personnel shall hereinafter be collectively referred to as “Employee(s)”.

Objective

The objective of the Code of Conduct is to lay down the framework in which Employees must conduct themselves at work, so as to avoid any wrongdoing and promote ethical conduct, as these are essential to the business and long-term success of the Company.

This Code clearly demonstrates the basic principles to be followed and adhered by our Employees so as to act legitimately while conducting business for and on behalf of the Company and

provides guidance with respect to specific principles that the Employees are expected to uphold so as to act in a manner that will reflect favorably upon Tower Vision and self.

Since the code cannot envisage each and every situation with respect to the ethical dilemmas an Employee may face, it outlines certain Dos and Don'ts which the Employees must keep in mind in all situations. While the Dos and Don'ts specified in the Code are not fully exhaustive, the Employees must use their good judgement to uphold the values and principles enlisted in the Code, at all times.

Expectations

From the Employees: All Employees of the Company are expected to read, understand and adhere to the Code at all times. Each Employee must understand that the appearance of an Ethical Conduct is as important as the actual intent of the Employee in a given situation. As a part of the implementation provisions of this Code, Tower Vision requires all its Employees to acknowledge their understanding and acceptance of this Code and confirm that they will comply with it religiously.

From the Employees occupying managerial and/ or supervisory position in the Company All the Directors, managers and supervisors are expected to be a role model of the behaviors expected under the Code, guide their subordinates to effectively follow the Code, encourage them to provide disclosures under the Code and report violations, if any.

COC SPOC

The Head of the Human Resources and/or the head of the Legal Department and/or the Internal Control & Risk Assurance Officer and/or the Company Secretary shall be considered as the spokesperson with respect to any query/concern the Employees may have with respect to the Code and shall be referred to as COC SPOC hereafter.

Interpretations, and Amendments of the Code

Any question or issues with regard to the interpretation/ understanding of any provision of the Code can be addressed to COC SPOC. The Board shall have the sole authority to amend this Code.

CODE OF CONDUCT GUIDELINES & PRINCIPLES

1. ETHICAL CONDUCT, HONESTY AND FAIR DEALING

The Employees are expected to act in accordance with the highest standards of personal and professional ethics, integrity and honesty at all such places where the Employees are present in their professional capacity. Also, the Employees shall promote fair dealing with colleagues, customers, suppliers and any related third party.

Honest conduct is understood as such conduct that is ethical, free from fraud, deception, misconduct and conforming to the highest professional standards, including the ethical handling of actual or apparent conflicts between personal-and professional interests.

Points to consider when in doubt:

- Is the act legal and does not violate any law?
- Does it seem/appear to be ethical or proper?
- Does it comply with Tower Vision' values?
- Would it be fine if the public at large knows your conduct under the said act?

If the answer to all the above questions is “yes,” it is probably safe to proceed. However, if the Employees are not so sure about the aforesaid aspects they must stop and reconsider their actions and if deemed necessary, seek advice from their reporting manager and the COC SPOC.

<u>DOs</u>	<u>DON'Ts</u>
<ul style="list-style-type: none"> ✓ Deal honestly, ethically and fairly with Employees, suppliers, vendors, customers and competitors. ✓ Do the right thing even when no one is watching. 	<ul style="list-style-type: none"> ✗ Do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice. ✗ Do not take unfair advantage of the Company, its customers or any other third party (existing or prospective), closely or remotely associated with the Company.

2. CONFLICT OF INTEREST

Conflict of interest may be defined as a situation where the personal interest of the Employee(s) could lead to or appear to lead to compromise the professional interest of the Employee(s) or when the Employee(s) find themselves in a situation in which competing loyalties could cause them to pursue a personal benefit/ preferential treatment for themselves, their friends, family or acquaintances at the expense of the Company or its business.

Each and every employee must keep his/her private interests separate from those of the Company.

Actual conflicts and/ or even the perception/ appearance of a conflict of interest can be damaging and hence must be avoided and disclosed well in advance.

Mandatory Disclosures:

- Actual/ potential conflicts of interests must be disclosed in advance to pre-empt the conflicts of interest in future.
- Immediately, upon becoming aware of the situation, make full disclosure of all facts and circumstances thereof to your reporting manager and the COC SPOC. In unavoidable circumstances take a prior written approval along with specific guidelines from the COC SPOC.
- When in doubt/ unsure consult the COC SPOC and your reporting manager.

Below are some of the situations where Conflict of Interest or appearance of Conflict of Interest can arise:

- *Outside Employment – When you take part in any activity beyond the scope of your work that compromises your ability to keep the best interests of the Companies intact or simultaneously accepting employment with a competitor.*
- *When a business matter bears personal interests that may make it difficult to perform your work and decision making objectively.*
- *When you have knowledge of proprietary information of the Company that may be used for getting personal gains - such as acquiring title (directly or indirectly) of a site on where a tower is proposed to be installed.*
- *When you receive personal benefits including non-nominal gifts, excessive entertainment or other business courtesies, directly or indirectly (directly or indirectly) as a result of your position in the Company and relationship with third parties that are involved with the Company.*
- *When you have any outside business activity, employment, advisory that detracts his ability to devote appropriate time and attention to your responsibilities with the Company or that competes with or is inter-related to the business of the Company.*
- *Having any interest, employment or any other relationship with any supplier, customer, development partner or competitor of the Company.*
- *Having any interest (directly, or through family member or a third party) in any property which the Company considers to lease/license as part of its business.*
- *Engaging in activities that compete with Company’s interest.*

Example, in the event a vendor of the Company is associated with an Employee of the Company, the latter should be refrained from handling any issues/ activities relating to the transactions with such vendor, such as approval of invoices, quality assurance, etc.

<u>Dos</u>	<u>DON'Ts</u>
<ul style="list-style-type: none"> ✓ If the situation leads to a personal benefit, always think if it would be regarded as a Conflict of Interest. ✓ Disclose any actual/ potential conflict of Interest to the COC SPOC and your reporting manager. 	<ul style="list-style-type: none"> ✗ Do not enter into contracts with relatives, without proper disclosures and/ or obtaining appropriate permissions. ✗ Avoid undertaking any activity that may appear to be a Conflict of Interest.

3. CORPORATE OPPORTUNITIES

The Employees owe a duty to the Company to advance to the Company all business opportunities, that they come across during their employment with the Company and not to use it for their personal gains.

<u>DOs</u>	<u>DON'Ts</u>
<ul style="list-style-type: none"> ✓ Use the Company's property, information or position only for the Company's legitimate business purposes. ✓ Pursue any activity related (directly or indirectly) to the Company's business only after obtaining a written approval from the Company. 	<ul style="list-style-type: none"> ✗ Do not take personal advantage from the opportunities that are discovered through the use of Company's property, information or position, including, without limitation, the use of information that is included in the search rings and/or service orders provided by the Company's clients, in order to personally purchase or lease any real estate on which the Company is intending to build a telecom site. ✗ Do not compete directly/ indirectly with the business of the Company or with any business being considered by the Company.

4. MEDIA AND COMMUNICATION

All external communication, including any communication on media/radio/ press, regarding any information relating to the Company may be done only by Company's authorized spokesperson and no other officer or Employee, except with the permission of the Board, may make any statement at such forums on behalf or in relation to the Company, its business and/or any other matter related to the Company. Each Employee must ensure that the outside communications (including online and social media posts) do not disclose any Company related information (or otherwise give the impression) that they are speaking on behalf of the Company, unless authorized by the Company.

<u>DOs</u>	<u>DON'Ts</u>
<ul style="list-style-type: none"> ✓ Consult with the COC SPOC before making any communication that could affect the Company. ✓ Provide advance notice to the COC SPOC of any activity likely to affect media and/or other external stakeholder interest. ✓ Always aim to project a positive image of the Company and no Employee shall degrade the image or malign the reputation of the Company. 	<ul style="list-style-type: none"> ✗ Never speak to the media without first consulting with the Corporate Relations team. ✗ Avoid tarnishing the reputation of the Company in the social media. ✗ Never disclose externally Company's commercially sensitive information without prior COC SPOC's approval. ✗ Do not degrade the image or malign the reputation of the Company.

5. CONFIDENTIALITY

The Employees shall maintain confidentiality of all information of the Company, entrusted to them or that comes in their possession/ knowledge while carrying out their duties and responsibilities, including the information of any of its customers, suppliers, fellow Employees or business associates towards whom the Company has a duty to maintain confidentiality (the "Company's Confidential Information"). The Company's Confidential Information here means and include all non-public information (including private, proprietary, and other) of the Company (or a third party - as stated above) whether financial, commercial, operational or other and in any form whatsoever. Also, no Employee shall exploit internal knowledge of the Company, for his/her personal benefit.

<u>DOs</u>	<u>DON'Ts</u>
<ul style="list-style-type: none"> ✓ Maintain confidentiality of all information entrusted to you. ✓ Properly secure, label and when appropriate dispose-off Confidential Information, in accordance with the applicable laws, policies and procedures. ✓ Carefully guard against disclosure of the Confidential Information. 	<ul style="list-style-type: none"> ✗ Do not use the information for your own personal benefit or the benefit of other persons. ✗ Do not share confidential information with anyone without requisite approvals. ✗ Do not disclose information to anyone except when the disclosure is authorized or legally mandated.

6. FAIRNESS AND RESPECT TO COLLEAGUES

Each and every Employee must know that his/her conduct is attributed to the Company and may affect Company's reputation and legal position. The Company thus expects its Employees to be fair, honest and respectful in their dealings with fellow Employees/ colleagues and any third parties relating to the Company and its business.

<u>DOs</u>	<u>DON'Ts</u>
<ul style="list-style-type: none"> ✓ Treat your fellow Employees and colleagues with respect and dignity. ✓ Be transparent in all engagements. ✓ Base hiring on merit and performance. 	<ul style="list-style-type: none"> ✗ Do not use abusive or colloquial language in your business engagements. ✗ Do not humiliate or scold others in front of an audience. ✗ Do not engage in a conduct that is intimidating and/ or offensive. ✗ Do not let your personal relationships influence/ impact your work decisions.

7. NO HARASSMENT OR DISCRIMINATION

Tower Vision is firmly committed to providing equal opportunity in all aspects of employment and does not tolerate discrimination or harassment of any kind. The Company strictly prohibits harassment verbal, physical, or visual, discrimination and bullying in any form and strongly encourages the Employees to immediately report any such incident to the COC SPOC. With respect to harassment, the Company has a policy for prevention of sexual harassment whereunder the

Company has constituted an internal complaints committee to which any person affected on account of sexual harassment can approach and complain.

<u>DOs</u>	<u>DON'Ts</u>
<ul style="list-style-type: none"> ✓ Treat others as you expect to be treated yourself. ✓ Have the courage to speak up about any discrimination you might see. ✓ Acquaint yourself with the Company's policy on Sexual Harassment. ✓ In case of any harassment, do approach the COC SPOC and/or the internal Complaints Committee. ✓ Speak up if you see or experience harassment or bullying at work. 	<ul style="list-style-type: none"> ✗ Never discriminate against anyone because of their, gender, race, culture, religion, marital status, sexual orientation and physical or mental ability. ✗ Do not behave in a way that is intimidating or humiliating to others. ✗ Do not distribute or display offensive, threatening or demeaning materials.

8. CUSTOMER, VENDOR AND SUPPLIER RELATIONSHIPS

The Company selects its suppliers only according to certain criteria viz. quality, reliability, technological standards, product suitability, demonstrable long term and conflict-free business relations etc. No Employee shall demand, accept, offer, or grant personal favors, kickbacks or benefit of any kind, either directly or indirectly, from a supplier, vendor, customer, any statutory or non-statutory authority, or any other third party, in connection with his/her official activities, and/ or in connection with the preparation, execution or handling of a business or contract, of the Company, unless the same is in accordance with the Company's policies, if any.

<u>DOs</u>	<u>DON'Ts</u>
<ul style="list-style-type: none"> ✓ Always comply with procurement and supplier management procedures relevant to your role. ✓ Treat suppliers and customers in an honest, respectful and responsible way ✓ Appoint third parties in line with Company's standards, policies and procedures. 	<ul style="list-style-type: none"> ✗ Never encourage a supplier to do something in connection with its business dealings with Tower Vision which would breach our Code, policies or the law. ✗ Never accept anything that exceeds mandated policy limits, if any, from a third party without seeking prior guidance/ approvals. ✗ Do not offer or accept bribes, kickbacks, any improper payments or other advantage to or from third parties.

9. PROTECTION AND PROPER USE OF COMPANY'S ASSETS

All Employees should protect Company's assets and property and ensure efficient use of the same. Theft, carelessness, abuse and wastage/ misutilization of Company's assets and property have a direct impact on Company's profitability and success and hence should be strictly avoided.

<u>DOs</u>	<u>DON'Ts</u>
<ul style="list-style-type: none"> ✓ Company's assets should be used only for legitimate business purposes of the Company, in accordance with the policy of the Company, if any. ✓ Prevent non-authorized personnel from accessing our facilities, information, data or other assets. ✓ Comply with the Company's policy, if any, when making the Company's property/assets available to third parties. 	<ul style="list-style-type: none"> ✗ Do not use the Company's assets and resources for personal gain. ✗ Do not ignore security threats to assets. ✗ Do not use Company's assets for personal activities or any other activities that are not related to the Company's business.

10. PERSONAL DATA & PRIVACY

The Employees are encouraged to respect the privacy of individuals and comply with all applicable laws on the collection, storage, use, retention, transfer and deletion of personal information (including sensitive personal data). The personal data of Employees must only be collected and processed for lawful purposes and the said data must only be used/ kept for as long as it is strictly necessary in light of the purpose for which the data was collected.

11. ADHERENCE TO ANTI-CORRUPTION, ANTI-TRUST, MONOPOLIES AND RESTRICTIVE TRADE PRACTICES

The Employees must adhere to all guidelines, practices, market norms and laws governing anti-corruption, anti-trust monopolies, and restrictive trade practices set forth by the Government. Tower Vision is committed to comply with all anti-corruption laws that prohibits bribes, kickbacks, or other corrupt actions to obtain or retain business or obtain any improper advantage. Thus, all the Employees are expected to comply with all applicable laws, decrees, orders and undertakings in this regard, affecting Tower Vision and/or its affiliates, if any, and ignorance of law shall not be entertained as an excuse.

<u>Dos</u>	<u>DON'Ts</u>
<ul style="list-style-type: none"> ✓ Be aware of all the anti-trade and anti-corruption laws associated with your job profile. ✓ When selecting firms/entities for doing business, exercise due care and diligence to ensure that only those with the highest reputation and integrity are selected. ✓ Reimbursement of expenses that seem to be much higher than actual expenditure must be avoided. 	<ul style="list-style-type: none"> ✗ Do not offer or receive bribes in the form of gifts, cash, facilities or any other manner either directly or indirectly. ✗ Do not accept/offer payments that are/ give impression of being excessive to the service/product being received by the Company

12. PROTECTION OF PROPRIETARY INFORMATION, TRADE SECRETS AND PROPERTY

In carrying out their duties and responsibilities, Employees must endeavor to protect the Company's proprietary information and trade secrets. No Employee shall make use of Company's facilities (e.g. equipment, stocks, vehicles, office materials, documents, files, data, media) or personnel for private purposes without the express permission of the requisite officer of the Company.

<u>DOs</u>	<u>DON'Ts</u>
<ul style="list-style-type: none"> ✓ Ensure that the Company's trade secrets and proprietary information are being used only for legitimate business purposes of the Company. ✓ Ensure to maintain such information Confidential at all times. 	<ul style="list-style-type: none"> ✗ Do not remove Company's property from its premises without appropriate approval from your reporting manager and/ or the COC SPOC. ✗ No data, inventories, programs or documents shall be copied and removed from or brought into Company's premises without express permission.

13. POLITICAL ACTIVITIES

Tower Vision respects the right of its Employees to engage in personal political activity, but the Employees must ensure that the activities are lawful and appropriate and do not involve the use of Company's time or resources (including facilities, equipment, stationery, email, phones, supplies or mailing lists).

<u>DOs</u>	<u>DON'Ts</u>
<ul style="list-style-type: none"> ✓ Maintain strict political neutrality. ✓ Do not make donations or other gifts to political parties, organizations or politicians, on behalf of the Company or in the guise of the Company. 	<ul style="list-style-type: none"> ✗ Do not devote your working hours or provide any Company's assets to support political campaigns or other political activities. ✗ Tower Vision's name and logos must not be used to support political parties or activities. ✗ Do not propagate your political agenda in the Company.

14. MONEY LAUNDERING

Money laundering is the illegal process of concealing funds or making illegal funds look legitimate. It also covers the use of legitimate funds to support crime or terrorism.

The Employees shall not indulge in any money laundering or similar activities in the name of or on behalf of the Company before any kind of government entity, official, body, or representative without the express written consent of the Company's management and must conduct counterparty due diligence in order to ascertain whom they are doing business with.

15. COMPLIANCE WITH LAWS, STATUTORY RULES AND REGULATIONS/COMPANY'S POLICIES AND PROCEDURES

The Employees must acquaint themselves and comply with all applicable laws, statutory rules and regulations, policies and procedures, which govern Tower Vision's operations. The Employees must acquire appropriate knowledge of the legal requirements relating to their respective duties sufficient to enable them to recognize and control potential exposures, and seek professional advice from the COC SPOC and or any related external advisors, as and when required, as per the defined protocols.

<u>DOs</u>	<u>DON'Ts</u>
<ul style="list-style-type: none"> ✓ Be well aware of the laws, policies and procedures related to your job profile. ✓ Abide by all the laws, policies and procedures applicable on the Company. 	<ul style="list-style-type: none"> ✗ Do not ignore the applicable laws, statutory rules and regulations, policies and procedures. ✗ Do not ignore non-compliance by others.

16. SANCTIONS AND EXPORT CONTROL LAWS

Various regulatory restrictions are enforced across the globe by various international organizations and authorities like the : (a) the United States government; (b) the United Nations; (c) the European Union; or (d) the United Kingdom, including the Office of Foreign Assets Control of the U.S. Department of Treasury (OFAC), the U.S. Department of State, the Bureau of Industry and Security of the U.S. Department of Commerce (including the designation as a “specially designated national or blocked person” thereunder), Her/His Majesty’s Treasury, United Kingdom or other relevant sanctions authorities, in the form of Sanctions and trade embargoes, and export control laws for the prevention of illicit activities. In line with the aforesaid, Tower Vision honors and follows laws related to sanctions and embargoes and has zero tolerance for violation of any form of sanctions and embargoes, direct or indirect, in all its dealings and operations.

“Sanctioned Countries” shall mean the countries, areas, or geographies including but not limited to Cuba, Libya, Syria, Iran, Iraq, Lebanon, North Korea, Somalia, Sudan, Yemen, Afghanistan, etc, and countries enlisted under UN.

“Sanctions and Embargoes” shall mean regulatory restrictions imposed by various authorities across the globe, against countries, organizations, entities, and/or individuals, for committing or being suspended for committing illegal or restricted activities.

“Sanction list can be accessed at <https://www.un.org/securitycouncil/sanctions/information> that are subject to Sanctions, as specified by applicable law from time to time.

<u>DOs</u>	<u>DON'Ts</u>
<ul style="list-style-type: none"> ✓ Abide by all the laws, policies and procedures applicable on the Company with respect to sanction laws. ✓ To ensure exiting Vendor/Business Partners are not engaging with or have 	<ul style="list-style-type: none"> ✗ Engaging into any act that may lead to a breach of this policy.

<p>been subjected to any Sanctions, on a quarterly basis.</p> <p>✓ Diligence must be exercised while engaging with New Vendors/ Business Partners or Third parties. Proper screening Must be done with respect to the imposition of any Sanctions and Embargoes or their engagement with the Sanctioned Entities, directly or indirectly.</p>	
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17. PROTECTION OF ENVIRONMENT, HEALTH AND SAFETY

The Employees shall take actions necessary in the course of their work to protect the environment, ensure the health and safety of themselves, fellow employees, customers and society at large, and must comply with all environmental, health and safety laws and regulations, enacted from time to time.

<u>DOs</u>	<u>DON'Ts</u>
<p>✓ Know the safety requirements and emergency procedures that apply to your work.</p> <p>✓ Use resources sparingly.</p> <p>✓ Look out for your colleagues and raise any potential safety issues.</p> <p>✓ Report any accident, injury or illness.</p> <p>✓ Take appropriate preventative measures for any infectious diseases that you have.</p>	<p>✗ Do not turn a blind eye if safety controls are not in place, not being followed or don't work.</p> <p>✗ Do not assume someone else will report a risk or concern; safety is everyone's personal responsibility.</p>

18. SUBSTANCE ABUSE

Our work benefits from our clear thinking and ability to react quickly. Therefore, we strictly prohibit any unauthorized use, possession and distribution of alcohol or being under the influence of alcohol and/ or drugs in the workplace.

<u>Dos</u>	<u>DON'Ts</u>
<p>✓ Report to work fit and ready (physically and mentally) to carry out your tasks.</p> <p>✓ Report situations where a work colleague is drunk or under the influence of alcohol and/or illegal drugs.</p> <p>✓ Discuss with your line manager or COC SPOC any situation where you suspect or know a colleague is taking prescription</p>	<p>✗ Do not come for work when drunk or under the influence of alcohol or any illegal drug.</p> <p>✗ Do not consume alcohol or illegal drugs at workplace.</p>

drugs which may impair their ability to work or otherwise pose a threat to safety.
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19. RECORD KEEPING AND REPORTING

The Company requires honest and accurate recording and reporting of information in order to make responsible business decisions and comply with the applicable laws. All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, appropriately reflect the Company's transactions and conform to applicable legal requirements and Company's internal controls. Records and documents should always be retained according to the applicable laws and Company's record retention policies, as applicable from time to time.

<u>DOs</u>	<u>DON'Ts</u>
<p>✓ Make sure that all transactions and disclosures are properly authorised, recorded and reported.</p>	<p>✗ Do not create false reports or records, or try to disguise what really happened.</p> <p>✗ Do not destroy records unless authorised to do so.</p>

20. VIOLATIONS OF THE CODE

The Employees are duty bound to abide by the Code in true letter and spirit at all times and take appropriate measures to effectively discourage violations by others. Therefore, the Company has a Vigilance Mechanism Policy whereby all the Employees are encouraged to report violations of the Code, the law, Company's policies and procedures. Any complaint with regard to the violation of the code or unethical conduct must be immediately reported under the Vigil Mechanism Policy of the Company.

We shall make sure that there shall be no retaliation to reporting of a complaint in good faith. Every reported allegation of illegal or unethical behavior will be thoroughly and promptly investigated. If required, the complainant's identity will be kept secret, and his/ her anonymity will be protected.

"Good faith" does not mean that the complainant has to be right, but it does mean that the complainant sincerely believed to have provided the Company with complete and truthful information.

All reported violations of this Code would be appropriately investigated. The Employees are expected to fully cooperate in investigations relating to any misconduct and the Company shall determine appropriate action in response to violations of this Code, which may result in disciplinary actions, including termination of services of the Employee and/or initiation of civil/criminal proceedings in critical circumstances. Needless to add, the Company shall not indemnify any Employee for any action that is in breach of the Company's Code.

<u>DOs</u>	<u>DON'Ts</u>
<p>✓ Follow the Code at all times.</p> <p>✓ Report any violations that you come across.</p>	<p>✗ Do not report violations in bad faith</p> <p>✗ Do not retaliate for good faith reporting</p>

<ul style="list-style-type: none">✓ Report only in good faith.✓ Produce evidence of violation, if any.✓ When in doubt speak with the COC SPOC.	
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<p>CODE OF CONDUCT</p> <p>EMPLOYEE ACKNOWLEDGEMENT CERTIFICATE</p>
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Employee Confirmation:

I hereby confirm and undertake that:

- I have received, read and understood the Company's Code of Conduct for Employees (the "Code") in its entirety;
- I shall comply with the Code, the applicable law, policies and procedures, that the Company may have from time to time,
- I shall keep confidential all the information that comes to my knowledge/ possession in the course of my employment/ association with the Company, in accordance with the Code;
- I understand that the violations to the Code may lead to disciplinary actions including but not limited to termination of my employment, initiation of civil or criminal proceedings against me;
- I have no relation or other personal or business arrangements, with any Employee or third party directly or indirectly associated with the Company, other than as disclosed below.
- If I have any queries concerning the meaning or application of this Code, any Company policies and/or the legal and regulatory requirements, I shall consult with the COC SPOC; and
- I will disclose forthwith any disclosures that are required to be made as per the Code, including, any breach of the code that comes to my knowledge.

I have the following disclosure to make (Please indicate 'NONE' where applicable):

Authorised Signatory Signature:

Name:

Designation:

Date:

Place:

Mob:

(Please sign and return this form to the human resources department)