

# Code of Conduct

## PURPOSE

SOTPL has always promoted high ethical standards of professional and personal conduct by its employees and business associates. All its employees and business associates must be, and should be seen as, committed to integrity in all aspects of their activities and comply with all applicable laws, regulations and internal policies.

The purpose of code of conduct is to improve overall compliance as well as to enhance further scope of good Corporate Governance with an ethical and transparent process in managing the affairs of the Company.

## APPLICABILITY

The Code will be applicable to all employees (full-time, part-time and those on contractual assignments).

In addition to employees, the Company will create awareness about the Code and shall use its best endeavours to influence compliance of the same among all vendors, suppliers, contractors & sub-contractors, consultants, Joint Venture partners and other business associates of the Company .

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## RESPONSIBILITIES TOWARDS THE COMPANY, OUR CUSTOMERS AND SUPPLIERS

### Honesty & Integrity

The Company expects its employees to perform their duties with honesty, integrity and to the best of their ability.

Employees should be honest, fair and trustworthy in all business relationships. They should honour the corporate values, obey the law and take responsibility for their actions and consequences. Employees are responsible for exemplifying the highest standards of ethical conduct.

### Trust

The Company demands that every employee demonstrate trust and respect in dealings with other colleagues in the organization as well as in their dealings with external parties. Distrust of colleagues / external parties and disrespectful behaviour shown by employees is strongly discouraged and will not be tolerated.

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## **Customer Orientation**

The Company expects all its employees to be customer-focused in approach. The success of the organization depends on customer trust, satisfaction and loyalty. Employees are strongly directed to ensure that customer needs are satisfied and that products and services offer value to the customer. Customer orientation and focus should not only encompass external customers, but include internal customers as well. Employees are thus encouraged to ensure that both, internal and external customer needs are satisfied.

## **Financial Reporting and Accounting**

The Company shall prepare and maintain its accounts fairly and accurately, and in accordance with the accounting and financial reporting standards which represent the generally accepted guidelines, principles, standards, laws and regulations of the country in which the Company conducts its business affairs.

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## **Bribery and Corruption**

The Company shall follow zero tolerance approach towards bribery and corruption; this includes any payments made by employees, consultants, agents and other intermediaries acting by or on behalf of the Company.

## **CONFLICTS OF INTEREST**

A conflict situation can arise:

- a. When an employee, officer, or director takes action or has interests that may make it difficult to perform his or her work objectively and effectively,
- b. The receipt of improper personal benefits by a member of his or her family as a result of one's position in the Company,
- c. Any outside business activity that detracts an individual's ability to devote appropriate time and attention to his or her responsibilities with the Company,
- d. The receipt of non-nominal gifts or excessive entertainment from any person/company with which the Company has current or prospective business dealings,

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## **CONFLICTS OF INTEREST**

A conflict situation can arise:

- e. Any significant ownership interest in any supplier, customer, development partner or competitor of the Company,
- f. Any consulting or employment relationship with any supplier, customer, business associate or competitor of the Company.

## **CONFIDENTIALITY OF COMPANY INFORMATION**

Any information concerning the Company's business, its customers, suppliers, etc., (including but not limited to technical, commercial and legal information) which is not in public domain and to which the employees have access or possess such information, must be considered confidential and held in confidence, unless authorized to do so and when disclosure is required under any law. No Company information shall be disclosed without the prior approval of the Head of the Business Unit and/or the Executive Directors concerned.

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## **CONFIDENTIALITY OF EMPLOYEE INFORMATION**

The Company shall protect the privacy and confidentiality of employee personal records.

All Employees who have, due to the nature of their work, accessibility to such records should not share or disclose any information unless required by any law, rule and regulation or when authorized by the employee or as per court order and should take approval from the Director and Head – Personnel & Administration in all such cases.

## **Equal Opportunities Employer**

The Company shall provide equal opportunities to all its employees and qualified applicants for employment without regard to their race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability.

The Company is committed to promote a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

Employees shall not indulge in any form of sexual harassment and treat every employee with dignity and respect.

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## **USAGE OF COMPANY ASSETS**

The assets of the Company shall not be misused; they shall be employed primarily and judiciously for legitimate business purposes only. These include tangible assets such as equipment and machinery, systems, facilities, materials and resources, as well as intangible assets such as information technology and systems, proprietary information, intellectual property, and relationships with customers and suppliers.

Employees shall protect the company's assets and shall not use these for personal use. Any suspected loss, carelessness, misuse or theft of the Company's assets should be immediately brought to the notice of the Director and Head – Personnel & Administration or the respective Divisional Head.

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## **Health, Safety & Environment**

The Company shall strive to provide a safe, healthy, clean and ergonomic working environment for its employees. The safety and security of employees in the workplace is a primary concern of the Company.

The Company, in the process of production and sale of its products and services, and in the process of developing its business, shall strive for economic, social and environmental sustainability.

## **GIFTS & DONATIONS**

The Company and its employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits that are intended, or perceived, to obtain uncompetitive favours for the conduct of business.

However, the Company and its employees may, with full disclosure, accept and offer nominal gifts, provided such gifts are customarily given and are of a commemorative nature.

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## **THIRD PARTY REPRESENTATION**

Parties which have business dealings with the Company but are not members of the Company, such as dealers/ distributors, suppliers, agents, channel partners, contractors, consultants etc, shall not be authorized to represent the Company without the written permission of the Company, and / or if their business conduct and ethics are known to be inconsistent with the Code.

Third parties and their employees are expected to abide by the Code in their interaction with, and on behalf of the Company.