

GTPL Hathway Limited

Code of Conduct for Business Associates

(Adopted on April 21, 2020)

1. Objective

This Code of Conduct for business associates defines the minimum standards of ethical and responsible behavior which must be met by all external business associates of GTPL Hathway Limited (herein referred to as the 'Company'). The Company expects all external associates to comply with the principles laid down in this code in the spirit of promoting and maintaining the highest standards of integrity in all spheres of business. The Company will strive to communicate this code and the principles herein and support the business associates appropriately in their pursuit of the same.

2. Scope

This policy applies to all the external business associates of the Company who will participate in the business activities of the Company. Where the business associate has in place a similar Code of Conduct, they will comply with their own Code, in addition to the principles mentioned in this document.

3. Policy outline

- 3.1 Provide guidelines for ethical and responsible behavior among all external stakeholders of the Company
- 3.2 Align the business associates to the core philosophy of the Company
- 3.3 Support the business associates in promoting ethical behavior among their employees
- 3.4 Promote awareness about environmental conservation among the business associates
- 3.5 Support the business associates in improving their environmental and social performance

4. Policy principles

- 4.1 The business associates are expected to comply with all local laws and regulations as applicable, in the course of business with the Company.
- 4.2 The business associates will not tolerate any cases of bribery or corruption occurring in their workplace or among their employees. Any instances of such activity must be dealt with in an appropriate manner as per existing policies.
- 4.3 The business associates shall treat all employees with dignity and respect. Under no circumstances shall physical punishment, sexual harassment or any forms of intimidation, verbal or otherwise be permitted.
- 4.4 Employees will be provided minimum-wages commensurate to their skills & abilities and guaranteed timely receipt of the same. Adequate rest days will also be given to safeguard their health.

- 4.5 The business associates will respect the freedom of association and collective bargaining of their employees and will take care that no retaliation arises from the exercise of such rights of the employees. They will also adopt an open and collaborative attitude towards the activities of Trade Unions. Where the rights to Freedom of Association and Collective Bargaining are restricted under law, the appropriate channels to support reasonable exercise of employees' rights will be designed.
- 4.6 The business associates are encouraged to report any instances of unethical behavior taking place in their facilities.
- 4.7 The business associates will preserve the integrity and confidentiality of all information they receive as a result of doing business with the Company. The obligation of confidentiality will remain even after the business relationship with the Company is terminated. The business associates are also required to return any material related to the Company, post the completion of the engagement.
- 4.8 The business associates will be committed at all times to protect the environment and comply with all standards and requirements of applicable local and international laws.
- 4.9 Appropriate measures will be taken by business associates to reduce the consumption of natural resources and curb the generation of waste, wherever possible, in the course of business.
- 4.10 The business associates shall endeavor to frequently communicate and create awareness of the principles in this code to all employees.