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**G-TECH INFRASTRUCTURE PRIVATE LIMITED, INDIA**

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**CODE OF CONDUCT POLICY****1. OBJECTIVE**

The objective of this policy is to set clear expectations for professional, ethical, and respectful conduct by all employees of G-Tech Infrastructure Private Limited (G-Tech Infrastructure) (“the Company”). This Code reflects our commitment to integrity, accountability, fairness, and respect in all dealings, internal and external, and serves as a guide for decision-making and expected behaviour.

**2. SCOPE**

This policy applies to all employees, consultants, and representatives of the Company, regardless of location or position, whether full-time, part-time, contractual, or temporary.

**3. TERMS AND CONDITIONS**

At G-Tech Infrastructure, every employee is expected to uphold the highest standards of professional and personal conduct at all times. The way an employee presents themselves, through appearance, actions, and interactions, directly reflects on their own growth as well as the reputation and credibility of the Company. This responsibility extends beyond the workplace, reinforcing the values of social and corporate citizenship that the Company stands for. Any lapse in this regard may attract disciplinary action, as outlined in **Annexure A** of this Policy.

The situations of conduct outlined below are illustrative and not exhaustive. Employees may encounter circumstances not specifically covered in this Policy; in such cases, they are expected to exercise sound judgment, seek guidance from Human Resources or their reporting manager, and act in a manner consistent with the Company’s values and expectations.

**i. Personal Conduct**

Working in a team would require some alignment of individual habits to create a mutually conducive work environment. It is every employee’s responsibility to refrain from the following:

- Use of abusive language with friends/ colleagues
- Loud talking/ disturbing work in the office
- Sending unsolicited mails.

Every employee is expected to treat clients and colleagues with respect and courtesy.

**ii. Conflict of Interest**

As a part of the Company, employees are expected not to engage themselves, directly or indirectly, either honorary or on remuneration, in any service, trade, business, vocation or occupation (including agent of any organisation) or in any advisory capacity. All employees must abide by the **Conflict of Interest (Col) Policy** (*documented separately*).

**iii. Confidentiality**

The Company owns certain exclusive proprietary information which is valuable. Misuse or unauthorised disclosure of any confidential information would constitute an act injurious to Company and that the unauthorised disclosure or use of any confidential information may adversely affect the Company's business, competitive position and goodwill.

By signing the Offer and Appointment letter at the time of joining the company, employees are bound by a confidentiality and non-solicitation agreement to refrain from disclosing any information that is of confidential nature. This shall apply while the employee is in employment of the company and also, post separation until such information becomes part of public domain.

**iv. Talking to Media**

Employees are refrained from talking to media unless authorised by the management.

**v. Compliance with Rules & Regulations**

Employees are expected to observe the rules and regulations outlined in this Policy as part of their commitment to professionalism and the Company's values. In situations where these standards are not upheld, the matter will be addressed in line with the Company's Disciplinary Policy, with the objective of guiding behaviour and safeguarding our collective reputation.

- Employees are discouraged from making false complaints, statements and representation to anybody that is likely to bring the company into disrepute, disrespect or defamation in the eyes of the public or in the eyes of law.
- Employees are expected to be absent only when their leave has been sanctioned and are not allowed to overstay beyond sanctioned leave.
- Employees are expected to receive/ accept official communication.
- Employees are not expected to distribute or exhibiting of newspapers, handbills, pamphlets or posters of any kind inside the company premises without the written sanction of the management.
- Employees should not raise false grievance.

**vi. Gifts**

The Company as a matter of policy discourages its employees to take the clients out for diner/ drinks and give them gifts.

- The Company does not support the action of employees securing material benefits from any institution/individual for the purpose of securing projects or for any other benefits. If any employee is found resorting to such means, then legal action would be taken by the Company.
- The Company strongly prohibits its employees from offering bribes to any authorities/institutions and hence would not support such acts of misconduct.
- Likewise, any gifts received by any person from a client, vendor, or any other party must be brought to the notice of the management and handed over to the Company. The only exceptions are diaries, calendars and planners.
- However, the Company encourages its employees to send greeting cards/email to its external client during Diwali/ New Year.

**vii. Fraud**

Employees should produce genuine and authentic bills to seek reimbursements for travel, food, medical, petrol, etc. If found guilty strict action will be taken, including termination from the services of the Company.

Employees should provide accurate personal information regarding the name, age, father's name, qualifications, previous service any other personal data sought at the time of confirming the employment to the Company or thereafter.

All employees must abide by the **Anti-Fraud and Anti-Corruption Policy** (*documented separately*).

#### viii. Bullying

The company as a policy condemns any act of bullying at workplace. Workplace bullying would include any act which falls under the following points:

- a) Repeated threatening, humiliating, or intentionally intimidating an individual at workplace by acts such as violence, blackmailing, etc.
- b) Any kind of verbal abuse including shouting or raising your voice in public or in private
- c) Publicly humiliating an employee in any manner including spreading rumours or defaming someone
- d) Any action that prevents any employee from completing/getting their work done
- e) Any kind of personal insult, mocking, using obscene gestures or addressing an employee with offensive nicknames
- f) To not allow an employee to speak or express himself (for example, interrupting or ignoring an individual)

#### ix. Disability Inclusion

The Company is committed to the dignity, equality, and inclusion of persons with disabilities in all the projects we undertake - and especially to the principle that our projects should 'do no harm'. We are committed to creating an enabling environment that provides for the creation of a barrier-free, safe work environment and, in line with their rights under the United Nations Convention on the Rights of Persons with Disabilities and related statutes of the Government of India to prevent all forms of abuse, violence and exploitation.

Disability Inclusion at the Company is informed by a set of principles which include:

- i. Zero tolerance of discrimination and/or abuse of a person with disability.
- ii. All persons with disabilities have the right to enjoy life with dignity.
- iii. Each person with a disability has a fundamental right to life, survival, and development.
- iv. All persons with disabilities should be encouraged to fulfil their potential, and inequality and discrimination should be challenged.
- v. Persons with disabilities will be assured the right to express their views freely on all matters affecting them, and appropriate support will be provided to them, keeping in view their age, gender and disability.
- vi. Everybody has a responsibility to support the protection of person with disability.
- vii. No person with disability must come to harm as a result of their engagement with the Company.

**Annexure A**

**Possible Disciplinary Actions**

- i. Permanent transfer or suspension without pay, or both.
- ii. Fine equivalent to 2 months' salary that can be credited to a welfare fund created to be utilised for welfare of employees.
- iii. Stoppage of increment with or without cumulative effect.
- iv. Reduction in level.
- v. Termination/ dismissal from the services of the Company.