



CODE OF CONDUCT & ETHICS POLICY

Objective:

This document defines the standards of ethical conduct which each employee of the PGP Glass Private Limited and its affiliates and member/associate/group companies in India and abroad (collectively referred to as “**the Company**” or “**the Organization**” in this policy document) commits to abide by in document/ letter and in spirit. It is a reflection of our core philosophy, our values and our overall culture. This Code of Conduct and Ethics Policy (“**Code**”) is intended to focus the attention of each employee on their conduct, provide guidance relating to handling of conflict of interest, ethical issues, provide mechanisms to report potential conflicts or unethical conduct and help foster a culture of honesty and accountability. The Code is an integral part of each individual’s employment contract, and all employees are expected to read and familiarize themselves with it.

Scope:

This Policy is applicable to all our company part-time and full-time employees, contractors, suppliers and other relevant third parties involved in the interests of PGP Glass in all countries in which we operate.

Roles and Responsibility:

CHRO is responsible for the implementation and review of this Policy in accordance with local, state and national laws. All employees, contractors, suppliers and other relevant third parties must read and adhere to the Policy and are responsible for creating and maintaining a culture of high ethical standards and commitment to compliance.

Communication:

Directors and employees read the policy document on the notice board and the website of the Company.

PGP Glass is committed to:

- Increasing the percentage of employees who received training on Code of Conduct to 100% by 2023.
- Attaining 0 case of ethical issues (including bribery, corruption, competitive practices, etc.) from 2024 onwards.
- Increasing the percentage of employees who received training on anti-competitive practices to 100% by 2024.

OUR CORE VALUES:

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| Empowerment & Resilience | We operate in an environment of mutual trust providing our team-members autonomy to perform with a sense of ownership. |
| | We build an agile and sustainable business that anticipates, adapts and acts quickly. |
| Entrepreneurship & Innovation | We promote a culture that nurtures and explores disruptive solutions with an ownership mindset in an environment of tolerance to bonafide mistakes. |
| | We continually explore new and creative ideas for overcoming challenges or performance improvement. |
| Care for People & Society | We deeply care for our people and treat them as an extended family. We protect and enhance the interest of our stakeholders (customers, employees, society and shareholders) in the spirit of trusteeship. |
| | We aspire to drive excellence in environmental, social and governance performance (ESG) along-side operational excellence endeavoring to give back to the society more than we take. |
| Humility & Integrity | We aspire to be the best and yet be modest without arrogance. |
| | We are consistent in our thoughts, speech and action and strive to live our values in our conduct. |

CODE OF CONDUCT & ETHICS

(A) GENERAL PHILOSOPHY

The Company is committed towards maintaining the highest standards of ethical conduct. This Code of Conduct & Ethics reflects the business practices and principles of behavior that support its commitment. It is adopted by the Company to govern the actions and conduct of all employees and officers of the Company (“**Employees**”) during the period of employment and their working relationships with current and potential customers, vendors, fellow employees, competitors, government and self-regulatory agencies and anyone else with whom the Company has contact.

This Code is intended to focus the attention of each Employee on their conduct, provide guidance relating to handling of conflict of interest, ethical issues, provide mechanism to report potential conflicts or unethical conduct and help foster a culture of honesty and accountability. The Company respects the local, state and national laws in the countries in which it operates. This Code will be administered in accordance with local, state and national laws. Each Employee of the Company is expected to comply with the letter and spirit of this Code.

Employees of the Company must not only comply with applicable laws, rules, and regulations but should also promote honest and ethical conduct of the business. Employees must abide by the policies and procedures that govern the conduct of the Company's business. Their responsibilities include (but are not limited to) helping to create and maintain a culture of high ethical standards and demonstrate a high degree of commitment to compliance. This Code contains general guidelines to Employees for conducting the business of the Company consistent with the highest standards of business ethics.

The Company's reputation is its most valuable asset. How we conduct ourselves day to day with each other, our customers, our shareholders, our competitors and our suppliers is the basis of our reputation as an ethical entity. We ought to consistently observe the highest standards of behavior and integrity to maintain this reputation. The actions of every Employee affect the reputation and integrity of the Company. Therefore, it is essential that each Employee takes the time to review this Code and develop a working knowledge of its provisions. Ignorance of this Code will not be treated as a valid defense in case of any violations.

This Code is not intended to be a comprehensive rulebook and cannot address every situation that Employees may face. The underlying rule is that in our daily conduct, we must ensure that our actions and policies are not only legal, but also in line with the highest level of business ethics and personal integrity. The Employees are expected to use good judgement in applying this Code. The Employees should also check the Company policies and procedures, as adopted at the location where the Employee is stationed for specific instructions.

The Company is committed to continuously reviewing and updating its policies and procedures. Therefore, the Company reserves the right to amend, alter or terminate this Code at any time and for any reason, subject to applicable law.

The Code applies to Employees while working on the Company premises, at client or offsite locations where business of the Company is being conducted, at Company sponsored business and social events, or at any other place the Employee is a representative of the Company.

Laws and Regulations

All the units of the Company and the parties with whom the Company has dealings shall operate in full compliance with relevant laws and regulations applicable to their operations and employment in the countries in which they operate. Violation of domestic or foreign laws and regulations may subject an Employee, as well as the Company, to civil and/or criminal penalties. To assure compliance with applicable laws and regulations, the Company has established various policies and procedures. Employees have an obligation to comply with these policies and procedures and to promptly alert a responsible supervisor, Legal Department or other appropriate internal authority of any deviation.

Legal compliance is not intuitive. To comply with the law, Employees must learn enough about the national, state and local laws in the countries in which we operate that affect their work at the Company to spot potential issues and to obtain proper guidance on the right way to proceed. When there is any doubt as to the lawfulness of any proposed activity, Employees should seek advice from the Company's Legal Department.

Parties with whom Company has Dealings

Employees engaged in business discussion with third parties such as consultants, contract labour, agents, sales representatives, distributors, channel partners, contractors, trainees, interns, and suppliers, shall ensure that such third parties do not represent the Company without its prior written permission. Employees shall ensure that the third parties which have business dealings with the Company, such as consultants, contract labour, agents, sales representatives, distributors, channel partners, contractors, vendors and suppliers, abide by the Code in their interaction with the Company, especially provisions relating to Confidential Information, usage of Company Property, bribery and corruption, drug, alcohol and weapons usage in Company premises, etc.

It is also the responsibility of the Employees to familiarize and bind all third parties, including sub-contractors with the Company's Code posted on the Company's website and comply with the same to the extent possible while representing the Company.

(B) SHAREHOLDERS/INVESTORS

The Company shall be committed to enhancing shareholder value and complying with all regulations and laws that govern shareholder rights. The Company offers its shareholders and/or investors, open, honest and timely information of the Company, its activities and financial position.

(C) CONFLICTS OF INTEREST AND GIFTS

The decisions and actions of Employees must be based on best interests of the Company and not personal relationships and benefits. Employees shall avoid potential or actual conflicts of interest between himself/herself/ themselves and the Company. Any situation that involves or may reasonably be expected to involve, a conflict of interest with the Company, should be disclosed promptly to the reporting supervisor, who shall address/take appropriate action and if necessary, he/she will inform the same to the department head.

For the Company to operate in a fair and open manner, it is very important that every Employee avoids any situation or interest, which might interfere with his/her judgment regarding his/her responsibilities to the Company, other Employees, customers, vendors and other parties.

A conflict of interest exists where the interests or benefits of one person or entity conflict with the interests or benefits of the Company. Some of the conflicts (illustrative but not exhaustive) from which an **Employee must refrain are set out below:**

- Provide, solicit or accept from customers, suppliers or others dealing with the Company any kind of gift or other personal, unearned benefits as a result of Employees' position or relationship with respect to the Company (other than non-monetary items of nominal intrinsic value). However, souvenirs / nominal gifts received up to a value of INR 2000 or 30 USD or 25 British Pound or 5000 Sri Lankan Rupee, which are customarily given and are of commemorative nature for special events, will not be considered as an instance of conflict of interest. For accepting any gifts or souvenirs above the value of INR 2000 or 30 USD or 25 British Pound or 5000 Sri Lankan Rupee, prior written approval from the Department Head or the Senior Management is necessary. Company may prohibit expenditures of any kind which may have perception of bribery. A record will be made by every Employee of every instance in which gifts or hospitality are given or received;
- Have a financial interest in the Company's competitors, customers, suppliers or others dealing with the Company, which is likely to be a reason to exercise influence or affect his/her judgment;
- Have a consulting, managerial or employment relationship with a competitor, customer, supplier or any other third party dealing with the Company;
- Acquire real property, leaseholds, patents or any other kind of property or any type of rights in which the Company has, or the Employee knows or has reason to believe at the time of acquisition that the Company is likely to have, an interest related to the business of the Company;
- Placing Company business with an entity owned or controlled by an Employee or his or her immediate relatives (*defined below*) or where an Employee or his/her immediate relatives have an interest or is employed;
- Become a supplier to the Company, by running an enterprise in the name of self or immediate relative;
- Engage in activity/employment that interferes or may potentially interfere with the performance or responsibility to the Company or is otherwise in conflict with or prejudicial to it;
- Conduct Company's business with a related party as defined under Companies Act, 2013 without obtaining the requisite approvals (i.e. of the board and/or shareholders as the case may be);
- Enter into engagements with any of the third parties (advisor/consultant, director, partner, trustee, shareholder/investor, etc.) without obtaining the requisite approvals.

Employees should be mindful of 'conflict of interest' with the Company and should endeavor to avoid them. In case there is likely to be a conflict of interest, he/she should make full disclosure of all facts and circumstances thereof to the next level in the hierarchy of the Company and a prior written approval should be obtained therefrom.

If an Employee's immediate relatives are employed by a client/vendor or potential client/vendor of the Company or is otherwise involved in or is in a position to influence a client or potential client's procurement of Company's products or services, the Employee is mandatorily required to notify the head of the department as soon as the Employee gains knowledge of the same.

Company policy prohibits conflicts of interest, except as approved in writing by:

- The Board of Directors, with respect to conflicts of interest related to directors, director nominees and executive officers; or
- Senior management, with respect to conflicts of interest related to all other persons.

Relatives and Conflict of Interest:

In relation to hiring or engagement of any "immediate relatives" of Employees (parent; child; sibling; parents of spouse; son-in-law; daughter-in-law; sibling of spouse; grandparent; grandchild; aunt; uncle; niece or nephew; immediate cousins.) Spouse and working couples are excluded in the definition, the following restrictions shall apply to the hiring of an immediate relative or engaging through contract:

- Within the same department or function;
- At a position in the same line of authority in which employees can initiate or participate in decisions involving a direct benefit to the relative. Such decisions include hiring, retention, transfer, promotion and leave requests approval;
- Participation in the appointment, compensation or evaluation;
- To hire, transfer or promote to a position under the direct supervisory responsibility.
- Hiring of working couples in same site is allowed and should be in-line with above stated restrictions.
- In case, two employees get married while in employment in our company post their joining, the policy clauses will apply with immediate effect. If required under the purview of this policy, applicable domestic transfer/job rotation rules will apply to meet the guidelines of this policy.
- The reporting manager is responsible for ensuring policy compliance.
- Department Heads are responsible for monitoring changes in employee reporting relations after initial hire to ensure compliance with this policy.
- Employees are responsible for immediately reporting any changes in relationship taking place during employment to their reporting manager and site HR.

The candidate, if relative of an Employee should mention the details of relative in the form submitted during the application process.

Additionally, it is the responsibility of each Employee to avoid situations that create a conflict of interest. Should Employees become immediate relatives or be in a relationship with an Employee during their employment and find themselves in a direct/indirect reporting or supervisory relationship, where a real or potential conflict of interest arises, such individuals must make the relevant disclosures to the Department Head and Business HR and thereafter, if need arises, seek a transfer or a change in the reporting relationship.

(D) PROTECTION AND PROPER USE OF COMPANY'S ASSETS

Each Employee has a personal responsibility to protect the assets of the Company from misuse or misappropriation. The assets of the Company include (but is not limited to) tangible assets, such as products, equipment and facilities, as well as intangible assets, such as corporate opportunities, intellectual property, trade secrets and business information, client / customer information (including any non-public, proprietary and Confidential Information (including personal data and sensitive personal data or information) of the Company, its affiliates, employees, former employees, competitors, business partners,

clients, suppliers, vendors etc. learned as an employee, officer or director of the Company) (“**Company Assets**”).

- “**Company Property**” includes Company Assets, Confidential Information and all property of, or relating to, the Company including, but not limited to Company funds, all Company records and documents, credit cards, sim card, mobile phone, laptop, formula, book, any letter of authority or power of attorney issued to the Employee, including all copies thereof (whether in electronic or physical form), all written communications and all data and communications transmitted or received to or by, or contained in, the Company's electronic or telephonic systems, and Company stationery provided for official purpose;
- Employees should protect the Company's Property and ensure their efficient use for legitimate business purposes only;
- The use of Company Property, whether or not for personal gain, for any unlawful or improper purpose is prohibited;
- To ensure the protection and proper use of the Company's Property, each Employee should:
(a) Exercise due care to prevent theft, damage or misuse of Company Property; (b) Report the actual or suspected theft, damage or misuse of Company Property to their supervisor and relevant governmental/regulatory authority; (c) Use the Company's telephone system, other electronic communication services, written materials and other Company Property, primarily for business-related purposes;
- As per Company policy, only licensed software is permitted to be used across the Organization. Employees shall not do any act which would result in unlicensed software being downloaded on any computer provided by the Company or use any unlicensed software for or in connection with the Company's business;
- Safeguard all electronic programs, data, communications and written materials from inadvertent access by others;
- Use Company Property only for legitimate business purposes, as authorized in connection with their job responsibilities; and
- The use of the “PGP” name and trademark shall be governed by manuals, codes and agreements and Employees are not permitted to use the name “PGP” in furtherance of any business interest in any manner not authorized by the Company. No third party or joint venture shall use the “PGP” brand name and trademark to further its interests without specific authorization.

The Company's Assets and Company Property may only be used for business purposes and such other purposes as are approved by the Company. Employees must not take, make use of, disclose or knowingly misappropriate the assets of the Company, for personal use, for use by another, or for an improper or illegal purpose. Employees are not permitted to remove, dispose of, or destroy anything of value belonging to the Company without the Company's express prior written consent, including both physical items and electronic information.

Further, the Employees should return all Company Property and Company Assets at the time of cessation of employment or prior to that, if so required by the Company and should not make or retain any copies of the same. Without prejudice to any other right available under applicable law, the Company reserves the right to make reasonable deductions from your full and final salary payment or any other amount(s) due to you, in the event that you fail to return any or all the Company Property which is in your possession, or return it in a damaged state, other than due to normal wear and tear.

Physical Access Control

The Company has physical access controls to ensure privacy of communications, maintenance of security of Company communication equipment and safeguard Company's Assets. Each Employee is personally responsible for complying with such physical access controls and shall not defeat or cause to be defeated the purpose for which they were implemented. Employees should avoid handing over their official assets like access card, laptop, etc. and other Company Property to others.

(E) NETWORK USE, INTEGRITY & SECURITY

This section is intended to supplement any other information security policy Company may have. Internet, intranet, removable external storage (pen drive/ CD drive/ external hard-drive etc.), external and internal e-mail access provided by the Company shall only be used for business related or other permitted purposes and in conformity with the Company's security policy and procedures and applicable laws and regulations. These facilities shall not be used in any way that might bring the Company or its management into disrepute or cause them embarrassment. The Company reserves the right to monitor or review any and all data and information contained on any Employee's computer or other electronic device issued by the Company, as per applicable laws. In addition, the Company reserves the right to monitor or review an Employee's use of the Internet, Company Intranet and Company e-mail or any other electronic communications without prior notice, to the extent permitted by local law.

Access to Company systems will be revoked and disciplinary action may be taken in the event that such systems are used to commit illegal acts, or to violate the non-discrimination, harassment, pornography, solicitation or proprietary information terms of this Code, or any other terms of this Code or any other policy of the Company.

In order to maintain systems integrity and protect the Company network, no Employee or officer should divulge any passwords used to access any Company computer or database.

All Employees should refrain from using or distributing software that may damage or disrupt the Company's work environment by transmitting a virus or conflicting with Company systems.

No Employee should engage in the unauthorized use, copying, distribution or alteration of computer software whether obtained from outside sources or developed internally. All software contains terms of use that must be adhered to.

Any suspected breach of the Company's network security systems should be reported to a responsible supervisor or appropriate internal authority immediately.

(F) NON – SOLICITATION

The Employee accepts and agrees not to solicit or attempt to solicit any other Employee, agents, consultants or representatives of the Company directly or indirectly during the course of his / her employment/ engagement or after termination / cessation of the same. The Employee also accepts and agrees not to solicit or attempt to solicit, directly or on behalf of another person, any customer, supplier, clients, vendors, distributors or service provider of the Company.

This non-solicitation condition will be binding on the Employee for a period of 1 (One) year from the date of cessation/ termination of his / her services from the Company and any breach in the said condition would result in considerable damages/loss to the Company, which cannot be adequately compensable by money damages. The Employee agrees and undertakes that in such an event the Employee shall fully indemnify and reimburse the Company to the extent of any losses suffered by the Company. Further, the Company will be entitled to an injunction restraining the Employee from committing such breach and/or claim for damages. Nothing contained herein shall be construed as prohibiting the Company from pursuing any other remedies available to it for such breach or threatened breach.

(G) FINANCIAL REPORTING AND RECORDS

The Company is required to prepare and maintain its accounts fairly and accurately 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.

Internal accounting and audit procedures is required to fairly and accurately reflect all of the Company's business transactions and disposition of assets. All relevant information should be accessible to the Company's auditors and other authorized parties and government agencies as per applicable laws. Employees shall ensure that there shall be no willful omissions of any of the Company's transactions from the books and records of the Company. Any willful material misrepresentation of and/or misinformation on the financial accounts and reports shall be regarded as a violation of the Code.

Each Employee is expected to comply at all times with the Company's **Policy with respect to authorization**, which provides for corporate approval limits. Any questions about the policy should be directed to the Company's Legal or Secretarial Departments.

Laws and regulations require the Company's records, including its financial, environmental, health and safety, human resources, research and development, analytical and intellectual property records, to accurately reflect the events they represent. Employees should record and maintain data in a timely and accurate manner. This protects the Company's resources and meets the expectations of the people who rely on the accuracy of the Company's records to perform their jobs. Falsifying business records is a serious offense, which may result in criminal prosecution, civil action and/or disciplinary action up to and including termination of employment. If the Employee(s) are authorized to make expenditures or enter into transactions on behalf of the Company, they must ensure that the applicable records comply with the Company's accounting and purchasing policies and that all transactions are recorded properly.

(H) LOANS AND GUARANTEES

Each Employee and their immediate relatives must not accept loans or guarantees of obligations (except from banks or other entities that provide such services in the normal course and at arms' length) from any individual, organization or entity doing or seeking to do business with the Company. The Employee should report any offer of such a loan to a responsible supervisor, or the Human Resources Officer or any other appropriate internal authority.

(I) EXPENSE CLAIMS

All business related expense claims (except for mobile and data card, wherever applicable) must be authorized by the Employee's supervisor before the incurrence. Personal expense will not be reimbursed by the Company. Business expenditure limits, as applicable, are set out in the relevant policies listed on the HRMS.

(J) COMPANY FUNDS

All Employees are personally responsible for Company funds over which they exercise control or which are entrusted to them. Company funds shall be used only for official purposes and not for personal purposes. Employees must maintain records of all funds spent (including genuine and original vouchers, where relevant) and submit the same in a timely manner.

(K) OUTSIDE EMPLOYMENT, MEMBERSHIP ON OUTSIDE COMMITTEES

The Company's Employees are expected to devote their full time and attention to the Company's business during their regular scheduled working hours and for whatever additional time may be required. Though the Company encourages professional development activities and community involvement, special care must be taken not to compromise duties owed to the Company. Employees should not undertake any

outside business activities or enter for any part of their time, in any capacity, the services of, or be employed by, any other firm, company or person, that divert their time and talents from the official responsibilities and create conflict in business activities.

Each Employee must obtain prior written approval from the Human Resources Department or the Board, as appropriate, before agreeing to serve on the board of directors or similar body of any for-profit or not for profit enterprise or government agency.

(L) BUSINESS INTERESTS

If an Employee is considering an investment that will lead to the Employee acquiring or holding a controlling stake in such entity, the Employee must disclose the facts and seek prior written approval from Company's Secretarial Team. For the purposes of this Code, the term "**controlling stake**" shall be generally understood to mean investment/acquisition of 2% or more of total shareholding of the entity, or are reasonably likely to receive a seat on the board of such entity, or influence the board composition of such entity, or control the management and policy decisions thereof.

Employees should be particularly sensitive to financial interests in competitors, suppliers, customers, distributors and strategic partners, and avoid creating substantial financial interests in these entities.

(M) POLITICAL AND OTHER OUTSIDE ACTIVITIES

The Company is committed to and supports the constitution and governance systems of the country in which it operates. The Company shall not support any specific political party or candidate for political office. The Company's conduct shall preclude any activity that could be interpreted as mutual dependence/favor with any political body or person and shall not offer or give any Company funds or Company Property as donations to any political party, candidate or campaign.

In addition, prior to seeking any election or appointment to public office, the Employee must obtain written approval of the Human Resources Department and clarify the Company's position in the event the candidacy is successful, or the appointment is made.

Subject to the limitations imposed by this Code, each Employee is free to engage in outside activities that do not interfere with the performance of his or her responsibilities or otherwise conflict with the Company's interests. Where activities may be of a controversial or sensitive nature, Employees are expected to seek the guidance of Human Resources Department before engaging in such activities. The Employees must not use their Company position or title or any Company Property, equipment, supplies or facilities in connection with outside activities, nor may they do anything that might infer sponsorship or support by the Company of such activity, unless such use has been approved in writing by the Human Resources and Legal Department.

(N) BRIBERY AND OTHER CORRUPT PRACTICES

The Company is committed to acting with integrity in all of our business relationships. We compete for business solely on the basis of the quality of the products and services we deliver. As such, we do not tolerate or condone bribery, fraud or corruption.

Bribery involves one person directly or indirectly offering, promising, granting, or authorizing a financial or other advantage (other than legal remuneration) to another person, corporate entity or public official (including but not limited to any customer or potential customer, government official, political party, candidate for political office or any intermediaries, such as agents, attorneys or consultants) in return for some improper favor or unfair advantage; fraud or in order to influence the conduct or judgment of that person or corporate entity or public official. Fraud involves criminal deception by someone designed to gain a financial advantage and corruption refers to a wide range of different corrupt activities, such as extortion, dishonesty and, abuse of office etc. Corruption may also include activities which would also amount to fraud or bribery.

Bribery is a criminal offense in India and in all of the countries in which the Company and its affiliates operate. Bribery subjects the Company and its Employees to significant legal and reputational liability. Any Employee of the Company who engages in or facilitates bribery (not limited to pecuniary gratification or gratification estimable in money) will be subject to discipline, up to and including dismissal and may also face significant legal consequences, including imprisonment.

The Company strictly prohibits giving, authorizing or promising anything of value to any person, including a government official, for any improper purpose, such as to obtain or retain business, secure an improper advantage, influence a decision or act, or cause the intended recipient to act improperly or in breach of a duty of trust. Similarly, no Employee, officer or director of the Company may request, agree to receive or accept a financial or other advantage in connection with their employment or relationship with the Company, except as provided in this Code. No Employee shall engage in any form of indirect bribery by offering or receiving any bribe through a third party.

The offer or payment of anything of value may constitute a bribe, no matter how small the amount. “**Facilitation payments**” are payments made to expedite routine government actions, such as processing visa, customs paperwork and so on. These payments are illegal in every country in which they are made and are therefore prohibited under this Code.

The Company and its Employees may be held criminally liable for bribery and improper payments made by third parties, such as consultants, contractors, contract workers, and agents, acting on behalf of the Company. For this reason, the Company will only engage third parties who are both reputable and qualified and who meet our standards for ethical commercial transactions. The Company will follow a documented due diligence process for those third parties that pose a risk of non-compliance with bribery laws.

It is of fundamental importance that we conduct our business ethically and in full compliance with all applicable laws of the countries where we conduct business including all laws relevant to countering bribery and corruption, as well as the implementation and enforcement of effective systems to prevent bribery and corruption. We do not enter into, or condone, any action that is contrary to legislation or its stated policies or practices. As such, the Company is committed to doing business in continued compliance with the (Indian) Prevention of Corruption Act, 1988, and all applicable anti-bribery and anti-corruption laws in all jurisdictions. It is the unconditional policy of the Company to comply with applicable laws in all jurisdictions designed to combat money laundering.

Every Employee of the Company has a duty to report violations of these policies and procedures (actual or suspected cases of bribery, fraud and corruption at the earliest possible), as well as any behavior conducted by any Employee or third party that reasonably appears to be contrary to these principles to the Human Resource Department and/or their reporting manager.

(O) CHARITABLE CONTRIBUTIONS

Charitable contributions on behalf of the Company should be made without demand or expectation of business return. Prior to making such a contribution, the credentials of the recipient should be verified and it must be ensured that such contributions are permissible under applicable law. Further, prior written approval of the Board of the Company would also be required. It must be ensured that the beneficiaries of such charitable contributions are not related to the Employee. No contributions can be made in cash or to the private account of an individual. All such contributions should be reflected accurately in the books of accounts of the Company.

(P) OTHER IMPROPER PAYMENTS AND BUSINESS DEALINGS

Each Employee is prohibited from offering or providing, directly or indirectly: (i) anything of value (including cash, bribes, kickbacks or other improper payments) to any client or prospective client’s employee or representative or other third party in connection with any procurement, transaction or business dealing for the Company, or (ii) any consulting, employment or similar position to any client or prospective client’s employee (or family member or significant other) involved with procurement for the

client or prospective client. Further, every Employee is required to know or inquire about the business entertainment, gift or contest policies of a client or prospective client and to comply with such policies, before offering or providing any client or prospective client with business entertainment, a nominal gift or an opportunity to participate in a transaction or a business deal. Further, a record will be made by every Employee of every instance when such offers are made. Further, the Company may prohibit expenditures of any kind which may have the perception of bribery. Providing or accepting of gifts has to be in compliance with this Code and all applicable laws, rules and regulations.

Any corporate gifts to be purchased for clients or prospective clients on festivals or other special occasions will require prior written approval of the representative of the Board or any senior managerial personnel of the Company. Upon approval, the Company may either grant advance for purchase of the gift or reimburse the value of the gifts purchased by the Employee(s).

(Q) CONFIDENTIALITY

All Employees should strictly observe their obligations of confidentiality as set out in their Offer letter, employment letter and other policies of the Company regarding any Confidential Information that they have access to or have had access to. Notwithstanding the contents of the offer letter, employment letter and Company policies in this regard, the Employees shall maintain the confidentiality of non-public, proprietary and Confidential Information of the Company or that of any customer, vendor or business associate of the Company to which Company has a duty to maintain confidentiality, except when disclosure is authorized by the Company in writing or legally mandated. All government/judicial requests for information, documents or investigative interviews (whether pertaining wholly or partially to Confidential Information, or not at all), should be brought to the attention of the Company's Legal Department, in writing, at the earliest possible time such that the Company has the opportunity to limit the disclosure of Confidential Information to the extent permissible by law.

Such Confidential Information and proprietary information must be used for the business purposes of the Company only and shall not be disclosed or used for the personal gain or advantage of any Employee. These obligations apply during the Employee's term of employment and post cessation thereof, without any limitation of time, irrespective of whether such cessation is initiated by the Employee of the Company or not. In the event copies of third-party Confidential Information are retained by the Company post the expiration of the term of the agreement entered into with such third party, no Employee will access such Confidential Information except as may be required by law or in connection with a legal, governmental or regulatory proceeding.

Unauthorized use and distribution of the Confidential Information is prohibited and illegal and would result in civil and criminal prosecution and penalties.

Employees acknowledge and agree that breach of any of the obligations of confidentiality will cause irreparable harm and injury to the Company. Hence, since the Confidential Information may be extremely valuable to the Company and effect of the disclosure thereof may not be quantifiable in terms of money, the Company will be entitled to obtain injunctive relief or other equitable remedies against the Employee in case of breach of such confidentiality obligations. Without prejudice to the foregoing, the Company also reserves the right to sue for damages in case of breach of such confidentiality obligations, at its sole discretion.

The "Confidential information" includes all non-public information (including private, proprietary and other) of the Company, its affiliates, clients, suppliers, vendors, business associate or their employees, whether written, oral, visual or electronic form or on any magnetic or optical disk or memory and wherever located, which is provided or disclosed to the Employee in confidence during the course of employment with the Company and which the Company or any person acting on behalf of the Company may disclose or provide to the Employee or which may come to the knowledge of the Employee by any means whatsoever, that might be of use to competitors or harmful to the Company. Without limitation,

the term shall also include information of the above kind, even if it is not marked as being “confidential”, “restricted” or “proprietary” (or any similar designation). Confidential Information will include:

- (i) Information disclosed to Employees by the Company, including its activities, business dealings, secrets, user information, prices, commission or data which are not in the public domain;
- (ii) Information disclosed to the Company or its Employees by a customer, research partner, or other person or organization with a contractual relationship with the Company when such contractual relationship between the discloser and the Company obligates the recipient to maintain confidentiality of the disclosed information;
- (iii) Information relating to technology, formula, processes, intellectual property, including Developments of the Company, its personnel, customers, subcontractors or any other individuals or companies having any kind of association or relationship with the Company. ‘Developments’ refer to writings and other works (whether or not copyrightable) and patentable and unpatentable inventions, discoveries, and ideas (including but not limited to any computer programs, applications or process) and any and all other proprietary rights relating to such works, inventions, discoveries or ideas, which are made, conceived or prepared by the Employee during the course of employment with the Company;
- (iv) Information relating to the business of the Company, its personnel, customers, subcontractors or any other individuals or companies having any kind of association or relationship with the Company; and
- (v) Information otherwise acquired, learned or developed by the Employee in the course of employment or with the support of the Company.

The Employee shall return all originals, copies, reproductions and summaries of Confidential Information in his / her control at the time of cessation / termination of employment or prior to that, if demanded by the Company.

Further, no Employee shall sign a third-party non-disclosure agreement or accept changes to the Company’s standard non-disclosure agreement without review and prior written approval by the Legal Department.

(R) DATA PRIVACY

Most countries have data privacy laws regulating the collection and use of personal data, which is any information that directly or indirectly identifies a natural person, although the types of data covered, the nature of the protection and local enforcement mechanisms vary. Examples of personal data include personal, employment, medical, financial and education and training information. All Employees are responsible for ensuring compliance with the data privacy requirements under the laws, rules and regulations of the applicable countries and Company policies and procedures in relation to privacy and data protection as may be communicated to you from time to time. Employees should also ensure that data privacy agreement is signed with all the vendors, prior to sharing Employee details for the purpose of payroll processing or analytical work.

Further, the Employees acknowledge that the Company may be required to collect, retain, transfer, process and store your personal information including any sensitive personal data or information (“SPDI”) such as, *inter alia*, financial information, medical records and history and biometric information as defined under the Information Technology (Reasonable Security Policies and Procedures and Sensitive Personal Data or Information) Rules, 2011. Employees expressly accept and agree to the collection, storage, use and transfer of your personal information, including SPDI, by the Company both within and outside India, for the purposes of your employment and related administration, accounting, protection of workplace safety, discharge of Company’s obligations as an employer or any other legitimate business purposes of the Company, as per applicable laws (as may be amended from time to time).

(S) FAIR DEALING

In carrying out their duties and responsibilities, Employees should endeavour to deal fairly, and should promote fair dealing by the Company, its Employees and agents, with customers, vendors and Employees. Employees must not take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. The Company respects the confidentiality and privacy of its suppliers and customers. Information about the Company's suppliers, customers, competitors and Employees must be used in an ethical manner and in compliance with the law. Under no circumstance should information be obtained through theft, illegal entry, blackmail, electronic eaves dropping or through misrepresenting affiliation with the Company or identity. Any Confidential Information or proprietary information should not be used if it is suspected that such information has been obtained improperly. Employees should abide by **business conduct for vendors**.

Similarly, each Employee must respect and protect any Confidential Information or proprietary information shared with the Company unless disclosure is necessary to comply with statutory requirements, court orders or other lawful process or properly authorized government investigations. This information should not be released without proper authorization and should be used for legitimate business purposes only. Employees and officers should not divulge any Confidential Information or proprietary information about their former employers, Employees, former Employees, competitors, business partners, clients or suppliers nor shall any Employee ever ask them to.

Customers and potential customers are entitled to receive accurate information regarding prices, capabilities, terms and scheduling. The Company strives to produce advertisements that are fair, accurate and lawful. False or misleading statements to sell or market Company products or services are to be strictly avoided. Immediate efforts should be made to correct any misunderstanding that may exist with a customer or potential customer.

(T) COMPETITION

The Company shall fully support the development and operation of competitive open markets and shall promote the liberalisation of trade and investment in each country and market in which it operates. Specifically, Employees shall not engage in activities and practices that amount to restrictive trade practices, abuse of market dominance or similar unfair trade activities.

The Employee shall market the Company's products and services on their own merits and shall not make unfair and misleading statements about competitors' products and services. Any collection of competitive information shall be made only in the normal course of business and shall be obtained only through legally permitted sources and means.

(U) CORPORATE OPPORTUNITIES

In carrying out their duties and responsibilities, Employees should avoid:

- Taking for themselves (or for their companies or other organizations in which they have financial or other interest) opportunities related to the Company's business.
- Using the Company's property or information for personal gain.
- Competing with the Company for business opportunities.
- Accepting special investment opportunities (meaning investment opportunities that are made available to an Employee because of or in connection with their status as an Employee or director of the Company) from a supplier, vendor (including banks or financial advisers), or customer with whom the Company is doing business or that is seeking to sell products or services to the Company without first disclosing, in writing, the opportunity to the Company's Legal/ Secretarial Department.

(V) PUBLIC REPRESENTATION OF COMPANY

The Management of the Company will nominate or designate one or more senior level officer(s) of the Company as 'Spokesperson' who would interact with the media/ radio/ press / journals / periodicals and/or provide social media updates. No Employee, except with the permission of Corporate Communications Department of the Company will make any statement in media/ radio/ press / journals / periodicals/ social media or give any interviews or opinions on matters which are concerning the Company or mentioning the Company. Employees shall vouch for the reputation and integrity of the Company and refrain from criticizing the Company or making any adverse written or oral statement or taking any action, directly or indirectly, which the Employee knows or reasonably should know to be disparaging, negative or capable of causing harm to the reputation of the Company or its affiliates, publicly or otherwise, in any article / in radio/ TV broadcast/ social media websites, etc.

In the event any Employee has to give any interview or opinion to the media/ radio/ press or journal, the entire content of such interaction to be disclosed shall be first verified and confirmed by the authorized Spokesperson or Corporate Communication Department of the Company.

Any breach of the above terms would be considered misconduct and apart from taking action for misconduct (which may range from warning and fine to termination from employment), depending on the nature of breach, the Company also retains the right to pursue any other legal course of action, including but not limited to approaching the courts or law enforcement authorities.

(W) EXPORT CONTROLS AND TRADE SANCTIONS

A number of countries maintain controls on the destinations to which products or software may be exported. Employees should become familiar with export controls and trade sanctions in order to ensure that the Company conducts its operations in accordance with such requirements.

(X) HEALTH, SAFETY AND ENVIRONMENT

The Company shall strive to provide a safe, healthy, clean and ergonomic working environment for its people. It shall prevent the wasteful use of natural resources and be committed to improving the environment, particularly with regard to the emission of greenhouse gases, and shall endeavor to offset the effect of climate change in all spheres of its activities. We are also subject to compliance with all applicable local laws to help maintain and secure healthy work surroundings.

(Y) EQUAL OPPORTUNITIES EMPLOYER AND AFFIRMATIVE WORKPLACE

The Company is an equal opportunity employer and bases its recruitment, employment, development and promotion decisions solely on a person's ability and potential in relation to the needs of the job, and complies with local, state and central employment laws. The Company makes reasonable job-related accommodations for any qualified Employee or officer with a disability when notified by the Employee that he/she needs an accommodation.

Every Employee shall be duty bound to respect the personal dignity, privacy and personal rights of every other Employee or individual he or she comes in contact with during the course of business or official dealings or otherwise.

Company shall offer equal opportunities to all its Employees based on their abilities, merit and talents. The Company shall apply fair measures to evaluate abilities and performances of its Employees and reward them accordingly. Company shall provide equal opportunities to all its Employees and all qualified applicants for employment, without regard to their race, caste, religion, color, ancestry, marital status, gender, age, physical and mental ability, socio-economic status and nationality. Employees who believe they have been subjected to any kind of discrimination that conflicts with this Code, any other policy or initiatives of the Company should seek assistance from their supervisor, Human Resource Department or both.

The Company is committed to a workplace that is free from sexual, racial, or other unlawful harassment, and from threats or acts of violence or physical intimidation. Abusive, harassing or other offensive conduct is unacceptable, whether verbal, physical or visual. The Company shall not tolerate any discriminatory conduct, abuse of authority, or harassment of any kind, including that of sexual in nature.

Employees must refrain from making jokes, slurs or other remarks that are about race, color, religion, gender, age, nationality or ethnic origin, sexual orientation, marital status and disabilities, that can encourage or create an offensive or hostile environment. If an Employee believes that they have been sexually harassed or threatened with or subjected to physical violence in or related to the workplace, they should report the incident to a member of the Internal Committee, who will arrange for it to be investigated. All efforts will be made to handle the investigation confidentially as per applicable laws. The Company's policy on Prevention of Sexual Harassment ("POSH") and list of Internal Committee members is available with respective Site HR.

The Company will not tolerate publishing, propagating, advocating or communicating feelings of hatred or discriminating against persons who have tested positive for Human Immunodeficiency Virus ("HIV") or live with a person who is HIV positive or on any other HIV related ground under the applicable law.

The Company will also not tolerate the possession, use or distribution of pornographic, racist, sexist or otherwise offensive materials on Company property, or the use of Company personal computers or other equipment to obtain or view such materials. All Employees must promptly contact an appropriate supervisor or Human Resources Department about the existence of offensive materials on the Company's systems or premises so that appropriate action may be taken, including notifying the proper authorities if necessary.

(Z) PROHIBITION OF CHILD LABOUR

The Organization strictly adheres to the Factories Act, 1948, the Child and Adolescent Labour (Prohibition and Regulation) Act, 1986 and/or other applicable law and doesn't employ any child labour. During the recruitment process, the age of the candidates is verified and scrutinized from the valid certificate/ proof for date of birth. The security officers of respective plants/ offices also ensure that no one under the age of 18 years enters into the Company premises for work.

(A1) DRUG, ALCOHOL AND WEAPONS ABUSE

The Company has adopted a "No Smoking Policy" and a "No Drinking Policy" at the office premises. Further, the Company is committed to providing a drug-free work environment. The illegal possession, distribution, or use of any controlled substances on Company premises or at Company functions is strictly prohibited. Similarly, reporting to work under the influence of any illegal drugs or alcohol and the abuse of alcohol or drugs in the workplace is not in the Company's interest and violates this Code.

The possession and/or use of weapons/ firearms or ammunitions on Company premises or while conducting business of the Company is strictly prohibited, except with the prior permission of Employee Health Safety Department or Administrative Department or as required under applicable law. Possession of weapons can be authorized for security personnel when this possession is determined necessary to secure the safety and security of the Company's staff, Employees or premises. However, this would not entail any liability or responsibility of the Company. Additionally, the person in possession of weapon must have and maintain all licenses and permits required under applicable law.

All accidents, injuries, or concerns about unsafe equipment, practices, conditions or other potential hazards should be immediately reported to an appropriate supervisor.

Any violation of this clause will amount to misconduct and the Company may initiate disciplinary action against the Employee as per its policies.

(A2) DRESS CODE

Since each Employee is a representative of the Company, attention must be paid to personal grooming and adhere to dress code, as may be recommended. Employees are expected to dress neatly and in a manner, consistent with the nature of the work performed. When visiting or working on a client site, Employees must adhere to the dress code maintained there.

- Employees appointed at Manufacturing Locations must mandatorily wear the company provided uniform.
- No uniform is applicable to employees appointed at Corporate Offices and the employees should wear formals. The employees can choose to wear smart casuals on last working day of the week.

(A3) JUDICIAL ORDERS AND GOVERNMENT INVESTIGATIONS

As a general matter, it is the Company's policy to cooperate in any government investigations and inquiries. All judicial, quasi-judicial information, document requests, or other inquiries must be referred immediately, in writing, to the Company's Legal Department.

All calls or inquiries from external lawyers must be referred immediately, in writing, to the Company's Legal Department.

(A4) COMPLIANCE WITH CODE OF CONDUCT

If any Employee who knows of or suspects of a violation of applicable laws, rules or regulations or of this Code, he/she must immediately report the same in accordance with the reporting mechanism set out in the respective section. Such person should, as far as possible, provide the details of suspected violations with all known particulars relating to the issue. The Company recognizes that resolving such problems or concerns will advance the overall interests of the Company that will help to safeguard the Company's assets, financial integrity and reputation.

It is the Company's policy to encourage the communication of *bona fide* concerns relating to the lawful and ethical conduct of business and audit and accounting procedures or related matters. It is also the policy of the Company to protect those who communicate *bona fide* concerns from any retaliation for such reporting. No retribution against any individual who reports violations of this Code in good faith will be permitted. No adverse action will be taken against anyone for complaining about reporting, participating or assisting in investigation of a suspected violation of this Code, unless the allegation made or information provided is found to be willfully and intentionally false.

All disclosures by any Employee or personnel shall be treated confidential and anonymous. Every effort will be made to investigate confidential and anonymous reports within the confines of the limits on information or disclosure such reports entail. While self-reporting, a violation will not excuse the violation itself, the extent and promptness of such reporting will be considered in determining any appropriate sanction, including dismissal. The Company will investigate any matter which is reported and will take appropriate corrective action.

Whistleblower Cases

If an Employee finds or has concerns related to: (a) questionable accounting, accounting controls, auditing matters or reporting of fraudulent information to shareholders, government or financial markets, (b) grave misconduct, or (c) conduct which is in violation of any law, the Employee must promptly contact the internal auditor in accordance with the Company's **Vigil Mechanism Policy**.

(A5) VIOLATIONS OF THIS CODE

Allegations of Code violations will be reviewed and investigated by Company's Legal Department and Human Resources Department or, in appropriate circumstances by other officers designated by the Company. Violations of this Code may result in, among other actions, suspension of work duties, diminution of responsibilities or demotion and termination of employment, as per applicable laws.

Those who violate the standards in this Code will be subject to disciplinary action. Failure to follow this Code or to comply with central, state, local and any applicable foreign laws, and the Company's corporate policies and procedures may result in termination of employment, as per applicable laws.

(A6) WAIVER AND AMENDMENTS OF THE CODE

The Company is committed to continuously review and update its policies and procedures. Therefore, this Code is subject to modification, as per applicable laws.

From time to time, the Company may in limited circumstances, waive some provisions of this Code to address equitable concerns raised to the Senior Management or the Board of the Company. Such waivers will not be granted unless necessary and warranted and will only be done in a limited and qualified manner. It is clarified that no one can claim a waiver, as a matter of right.

(A7) HUMAN RIGHTS

We recognize the valuable role that business can play in the longer-term protection of human rights by being committed to respecting the human rights of our workforce, communities and those affected by our operations wherever we do business (including our contractors and suppliers) in line with internationally recognized frameworks. Our commitment entails respecting human rights and seeking to avoid involvement in human rights abuses, identifying, assessing and minimizing potential adverse impacts through due diligence and management of issues, and resolving grievances from affected stakeholders effectively.

We endeavor to achieve our commitment by:

- Maintaining positive legal compliance with applicable constitutional and regulatory human rights requirements and conforming to the Company's sustainability framework;
- Undertaking an iterative, due diligence process, the focus of which is identifying, assessing and managing potential risks and impacts;
- Aligning our existing policies, processes and activities with our commitment to respect human rights, including those that apply to labour practices, engagement with indigenous peoples; land acquisition, supply chain, and security management;
- Promoting awareness of the human rights with Employees at various levels of our operations through training and communication;
- Engaging with stakeholders in an inclusive, transparent and culturally appropriate manner on human rights concerns related to our business activities;
- Valuing diversity, equal opportunity and the need to consider the rights of vulnerable groups such as indigenous peoples, women, migrant workers and other minorities;
- Prohibiting all forms of harmful child labour/ forced / trafficked labour, discrimination and harassment;
- Prohibiting any contribution to armed conflict or human rights abuses in conflict-affected and high-risk areas;
- Prohibiting interference in any way with the establishment, functioning or administration of workers' organizations or collective bargaining;
- Respect the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal, in accordance with national law;
- Providing access to remedy by resolving grievances in a timely and culturally appropriate manner;

- Influencing our contractors, suppliers and other organizations with whom the Company has a leverage to adopt our sustainability framework and to encourage and support the development of equivalent management systems;
- Developing goodwill, creating sustainable employment and stimulating economic opportunities in the communities that host our activities;
- Establishing clear accountability by assigning adequate resources and responsibilities for effective management of human rights risks; and
- Continually improving human rights performance by sharing good practices and learnings, setting and reviewing targets, and monitoring, reporting and disclosing performance. The Company shall sign up to this policy or develop an equivalent that shall be implemented throughout its operations;
- We recognize that it is critical to regularly identify and address actual or potentially adverse human rights impacts that we may be involved with either directly or indirectly through our activities and business relationships. We do so by creating awareness with Employees and ensuring that they can ask questions, seek clarification and report potential human rights violations without fear of reprisal or retaliatory action. Employees may contact Location HR Head or the Internal Auditor;
- We are committed to investigating, addressing, and responding to any concerns raised, taking appropriate corrective action when required, tracking our progress and communicating with stakeholders about human rights issues and how we address them. To that end, we also use appropriate indicators to measure and track our human rights performance.

This policy shall be reviewed periodically for its suitability and updated as necessary, as per applicable laws.

WHO DO I CONTACT FOR GUIDANCE OR TO REPORT CONCERNS?

If an Employee believes a situation may involve or lead to a violation of this Code, they have an affirmative duty to seek guidance and report such concerns.

- Seek guidance from a responsible supervisor (for example, immediate supervisor, a department head or location manager) or other appropriate internal authority (for example: Human Resources /Legal Department).
- Disclose concerns or violations Code to the relevant authority (as set out below).

It is the Company's policy to encourage the communication of *bona fide* concerns relating to the lawful and ethical conduct of business and related matters. It is also the policy of the Company to protect those who communicate *bona fide* concerns from any retaliation for such reporting.

No Company policy can provide definitive answers to all questions. It is difficult to anticipate every decision or action that an Employee may face or consider. Whenever there is doubt about the right ethical or legal choice to make, or questions regarding any of the standards discussed or policies referenced in this Code, an Employee should fully disclose the circumstances, seek guidance about the right thing to do and keep asking until guidance is obtained. The earlier a potential problem is detected and corrected; the better off the Company will be in protecting against harm to the Company's business and reputation.

| Concerns related to | Reported to |
|---------------------------------|---|
| Financial Reporting and Records | To be directed to Legal or Company Secretarial Department |
| Insider Trading | Approval from Company Secretarial Department |
| Loans and Guarantees | Human Resources or Senior Management |
| | Reported to next level in hierarchy |
| | Gift value approval required from Head of the Department or Senior Management |

| | |
|--|---|
| Conflict of Interest | Employment of immediate relatives to be notified to Human Resource Department |
| | Immediate relative disclosure to Head of the Department and Business HR Head |
| | Conflicts to be directed to Human Resources and Legal Department |
| Political and Other Outside Activities | Notify Human Resources Department |
| | Use of Company Title – seek approval in writing from Human Resources & Legal Department |
| Outside Employment, Membership on Outside Committees | Approval from Human Resources or Board of Directors |
| Judicial Orders and Government Investigations | To be directed to Legal Department |
| Business Interest | Approval from Company Secretarial Department |
| Confidentiality | To be directed to Legal Department |
| Public Representation of Company | Verification from Corporate Communications Department |
| Drug, Alcohol and Weapons Abuse | EHS or Admin department (as applicable) |
| Corporate Opportunities | Disclosure to Legal or Company Secretarial Department |
| Equal Opportunities Employer and Affirmative Workplace | POSH - Internal Committee (for sexual harassment) |
| | Notification to Head of the Department and Human Resource Department |

Awareness on Code of Conduct:

Awareness on the Code of Conduct shall be provided to new Employees joining the Company during the Induction program and Refresher training shall be provided once in every two years to existing employees of the Company.

Also, Employees shall be made aware of any amendments to this Code.

Acknowledgement by Employee:

***As an Employee of PGP Glass, each individual must observe –
“I acknowledge the receipt of PGP Glass’s Code of Conduct and Ethics. I have read and understood the PGP Glass’s Code of Conduct and Ethics and agree to abide by all its provisions both in letter and in spirit.”***

Review mechanism

This Policy is reviewed annually by March and updated as necessary. The Company reserves the right to amend, alter or terminate this Policy at any time and for any reason, subject to applicable law.

| Revision History | | | | |
|------------------|----------------|-------------|-------------|-----------------|
| Version No. | Effective Date | Prepared By | Approved By | Description |
| 1.0 | 22.07.2022 | CHRO | Board | Policy adoption |
| 1.1 | 01.12.2022 | CHRO | Board | Amendments |
