

**////SterlitePower**

# **CODE OF BUSINESS CONDUCT & ETHICS**

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**STERLITE  
POWER  
TRANSMISSION  
LIMITED**



# CODE OF BUSINESS CONDUCT & ETHICS

This Code of Business Conduct and Ethics (the “Code”) is a reference document outlining the standard code of conduct for Sterlite Power Transmission Limited (the “Company”) and its subsidiaries (together called the “Group”) and for its directors, officers, employees, contractors, suppliers or any other third party intermediaries (the “Associates”).

The Code is for internal compliances and does not create, nor shall it be construed to create, directly or implicitly, any rights, duties or obligations of the Company to any person, body or legal entity.

**MESSAGE FROM  
THE CHAIRMAN**



## Dear Associate,

The Code is an extension of our values and reflects our commitment to ethical business practices and regulatory compliances. It summarizes the principles and policies that guide our business activities and provides information about our business conduct and Ethics and Compliance Program. It is not meant to replace our detailed policies; rather it reflects statements of our principles in a number of important areas.

As an Associate, you are responsible for understanding and complying with the standards of the Code, applicable government regulations and our policies.

We have ambitious business plans and an inspiring purpose of empowering humanity by addressing the toughest challenges of energy delivery. These standards of business conduct exist to provide you with information and resources that will help you make good and informed business decisions. Every Associate acting with integrity is what will help us make Sterlite Power a great company and to achieve our purpose.

Pravin Agarwal  
Chairman

A man with short dark hair, smiling, is seated on a light-colored, tufted sofa. He is wearing a dark blue suit jacket, a white dress shirt, and a yellow and blue striped tie. His hands are clasped in his lap. Behind him, a large framed painting depicts a boat on a blue sea. The background wall is dark wood paneling. To the right, a small table holds some papers or magazines.

MESSAGE FROM  
THE CEO

## Dear Associate,

The global business environment is continuously changing & demanding more from us as a Company and as Associates. Not only does the world expect us to deliver the best, it also expects us to conduct ourselves ethically and responsibly.

We know it is not enough to just do the right things; we have to do them in the right way. The way that we accomplish our work is as important as the work itself. It is essential that we conduct ourselves with integrity and in compliance with the laws and regulations that govern our business activities.

We aspire to be an excellent Company - A Company that is not only a business leader but also a responsible “Corporate Citizen”. This Code will be of guidance to you to perform your individual and collective responsibilities with integrity, as we pursue our core purpose of empowering humanity by addressing the toughest challenges of energy delivery.

Pratik Agarwal  
Chief Executive Officer

# HOW WE DO BUSINESS

The most valuable asset of the Company is its reputation. The foundation of this reputation is laid down by our behavior towards our customers, our stakeholders, our competitors, our business partners and our contractors and suppliers.

Our customers and stakeholders expect us to maintain high ethical standards, to fulfil our commitments and to act with complete integrity. We will make sure that our actions and policies are not only compliant with the laws of the land, but are also in line with the highest level of business ethics and personal integrity, in order to carry forward the name and reputation of the Company.

We will continue to embed the values of **Respect, Fun, Innovation & Social Impact** in all that we do. Doing the right thing forms the foundation for how we do business and our Code of Conduct represents our shared commitment to operate with the highest level of ethical conduct.

The Company expects that all Associates will understand and follow the Code. If you see something wrong, or are not sure if something is right, report it.

It is important to remember that your conduct is very significant for the Company. It is the Associates and their conduct that have helped make this Company what it is today.

A close-up photograph of two people in business attire. One person's hand is holding a small white card, which is being held by the other person's hand. The background is blurred, showing other people in a meeting setting. The word "INTRODUCTION" is overlaid in white capital letters in the center of the image.

# INTRODUCTION

# PURPOSE OF THE CODE

The Code is an important part of the purpose and values of the Company. The Company expects all its Associates to uphold the highest standards of ethical behavior and integrity. We believe that ethical and economic values are independent and that the business community must always strive to operate within the accepted norms established by national and international authorities.

The Company and all its Associates shall adhere to all the laws and regulations of the country in which they operate and fulfil their obligations in a reliable manner. Associates must be honest and fair and insist our business partners to be the same. In any situation, which is not governed by this Code or any statute or regulations, the Company's affairs will be conducted in accordance with its high standards of business practice.

The Company has 'zero' tolerance for any breach of this Code or any applicable laws or regulations or the Group's standards. The breach is not justified on any ground, even the profit of the Company.

The Company and all its Associates shall operate as per the guidelines that are laid down in this Code.

# RESPONSIBILITIES TOWARDS THE COMPANY & CO-WORKERS





## GENERAL GUIDELINES & REPORTING MECHANISM

There should be strict adherence of this Code and all other applicable laws and regulations of the countries where we operate both in letter and spirit. If there is any violation of this Code which an Associate is aware of, it must be reported to **stl.whistleblower@vedanta.co.in** or via the ethics helpline number **000-800-100-1681**. The Associate may choose not to disclose their identity while reporting such violations. The Company ensures that it shall protect the identity of the reporter. Further, the Company hereby, forbids any kind of retaliation against any Associate who reports the violation. Any such act shall be subject to strict disciplinary actions.



## ANTI - DISCRIMINATION

The Company prohibits discrimination, harassment or intimidation of any form, which violates the policies of the company or is otherwise unlawful. Any kind of discrimination or harassment based on gender, race, color, creed, caste, religion, nationality, disability, marital status, pregnancy, sexual orientation, culture, socio-economic status or any other characteristic protected under applicable laws is completely prohibited.

If you or someone else is being subjected to discrimination, harassment or intimidation of any form you must report such behavior to **stl.whistleblower@vedanta.co.in**.



## COMPLIANCE OF LAW

The Company is committed to comply with all the applicable laws and regulations of the countries where it operates. All of the Associates are expected to uphold the standards laid down in the Code and applicable laws and regulations.



## DRUG AND ALCOHOL ABUSE

Maintaining a healthy & productive work environment is everybody's responsibility. Misusing controlled substances, or selling, manufacturing, distributing, possessing, using or being under the influence of illegal drugs and alcohol at the work place is absolutely prohibited.



## DRESS CODE

Since each of us is a representative of the Company, we must pay attention to personal grooming and adhere to the recommended dress code wherever applicable. All Associates are expected to dress neatly and in a manner consistent with the nature of work performed.

When visiting or working on site, Associates must adhere to the dress code maintained at that particular site.

# RESPONSIBILITIES TOWARDS STAKEHOLDERS

A close-up photograph of two business professionals in dark suits. One person is holding a silver tablet, and the other is pointing at the screen with their right index finger. The background is a blurred green outdoor setting. The overall tone is professional and collaborative.



## PROVIDING TRUE AND ACCURATE INFORMATION

The Company works in close connection with the government and its entities. The business of the Company is largely affected by the decisions of the government and its agencies. Therefore, we look forward to maintaining a fair and constructive relationship with the government.

If you contact any of the government officials for any of the Company's business, you must make sure that the information shared is true, accurate and in the best interest of the Company. You must contact the Legal Department in case you need any clarifications while dealing with government bodies.

Also, you are strictly instructed to refrain from indulging in any corrupt practices. Never offer, promise to offer or accept any undue favors from anyone in cash or in kind.



## RELATIONSHIP WITH CUSTOMERS

The utmost responsibility of the Company is towards its customers and their needs. When you are dealing with a customer or a potential customer, it is critical for you to remember that you represent the Company and your efforts will create value for the Company and build a relationship based upon trust.

The Company & its Associates have provided services for many years & have built up significant goodwill over a period of time. This goodwill is one of our most important assets, and the Associates must act to preserve the same. The Company and its Associates will be diligent while selecting customers.



## COMPETITIVE INFORMATION

You should never attempt to obtain a competitor's confidential information by improper means, & you should especially never contact a competitor regarding their confidential information. While the Company may and does employ former Associates of competitors, we recognize and respect the obligations of those Associates to not use or disclose the confidential information of their former employers.



## SELECTING SUPPLIERS

We treat the Company's suppliers as contributors to our success. Our suppliers must be confident that they will be treated lawfully and in an ethical manner. While engaging with our suppliers we recognize that we need to manage our expenditure on procurement with social, ethical and environmental perspectives in mind by ensuring that our suppliers meet our standards of responsible behavior. Wherever any serious ethical issues are identified, the supplier will be excluded from doing business with us. Our procurement process will ensure that we take all possible steps to ensure our suppliers do not unnecessarily impact the environment in the way they produce, consume and dispose materials.



## FREE AND FAIR COMPETITION (COMPETITION/ ANTI-TRUST LAWS)

The Company is committed to free & fair competition in the marketplace. Associates should avoid actions that would be contrary to laws governing competitive practices in the marketplace including The Competition Act, 2002 or other relevant anti-trust laws applicable in the countries where we operate. Such actions include misappropriation and/or misuse of competitor's confidential information or engaging into agreement with competitors and common suppliers. The Group and its Associates shall under no circumstances engage in any anti-competitive practices such as illegal fixing of prices, sharing of markets or other actions which prevent, restrict or distort competition in violation of applicable competition laws.



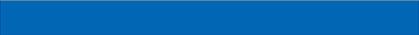
## CONFLICT OF INTEREST



A Conflict of Interest may be defined as a situation in which an Associate has or is in a situation to place his personal interest above the interest of the Company and where such personal interest influences that Associate's business decisions or actions in a way that it is prejudicial to the interest of the Company.

During the course of employment, the Associate's decisions and actions should serve the best interest of the Company, and not their personal benefits. Each of us hold a responsibility towards the company & its stakeholders. Although this duty does not prevent us from indulging in personal transactions or investments, it does require that we avoid situations where a material<sup>1</sup> conflict of interest might occur or our ability to exercise judgement in the best interest of the Company is compromised.

<sup>1</sup> For the purpose of the Code, the term "material" shall mean: anything which holds importance or which is significant to a level that it would affect the decision of a reasonable person relating to subject matter of this document.



An Associate involved in any transaction where a conflict of interest has or may arise should immediately disclose such circumstances to his immediate supervisor or the Ethics & Compliance Team so that the Company may take corrective actions accordingly. Failure to disclose facts shall constitute grounds for disciplinary actions, up to and including termination.

Your specific involvement with a competitor, supplier or customer can create an actual or potential conflict of interest. You are expected to maintain transparency in such matters.

You, as an Associate of the Company, are expected to:

- not engage in any activity that interferes with your performance or responsibilities towards the Company or is otherwise in conflict with or prejudicial to the interest of the Company. Our policies prohibit any Associate from accepting simultaneous employment or directorships with any other company outside the Group Companies.
- not invest with a Company's customer, supplier and developer or competitor and/or their related companies.
- not conduct business with a relative, or with an organization in which a relative is associated in any significant role. Relatives include spouse, siblings, children, parents, grandparents, grandchildren, aunts, uncles, nieces, nephews, cousins, step relationships, and in-laws. If such a related party transaction is unavoidable, you must fully disclose the nature of the related party transaction to your manager or the Ethics & Compliance Team.
- ensure that all related party transactions are reported in writing to your manager or the Ethics & Compliance Team so that those can be reviewed and approved in writing in advance.

**BRAND USE  
& PROTECTING  
CONFIDENTIAL  
INFORMATION**



# STERLITE BRAND

The use of the Sterlite name and brand owned by the Company shall be done only for the purpose of the Company's business and shall not be used for personal use or benefit.

## MAINTAINING CONFIDENTIALITY

From time to time you are entrusted with confidential information by the Company with the expectation that you fully understand the importance of maintaining confidentiality of such information. This information is the Company's valuable asset. The Company's confidential information includes but is not limited to product design, product plans, inventions, manufacturing process, list of customers pricing, pricing policy, discount schemes,

budgets, financial information and results, expansion/ diversification plans and corporate restructuring plans. This information is the property of the Company and may be protected by patent, trademark, copyright and trade secret laws. All confidential information must be used for Company business purposes only. Every Associate must ensure to safeguard the confidential information that is shared during the tenure of employment. Publicity or sharing or unauthorized copying of such information or handling it negligently should be strictly avoided and failure to do so may invite disciplinary action as per the applicable law &/or Company policy.

Any information that is confidential and shared with the other persons should be shared only on need to know basis with prior approval of your head of department. This obligation extends to confidential information of third parties, which the Company has rightfully received under Non-Disclosure Agreements. Your confidentiality obligation remains in effect for as long as you work for the Company and even after you cease to be in the employment.

A close-up photograph of a person's hands. The right hand holds a dark brown pen with gold accents, and the left hand holds a black pen with a silver band. Both pens are held horizontally, pointing towards the left. Below the hands is a silver laptop keyboard. The background is blurred, showing another laptop screen and a bright, out-of-focus environment.

## INSIDER TRADING & INFORMATION BARRIERS

As an Associate of the Company you shall have access to material, non-public information about our Company, our Clients and other companies that conduct business with us. You and your family shall not use such information to derive any benefit or assist others to derive any benefit from wrongful use of such information and thus constituting to insider trading.

Any person having access to price sensitive information is obliged:

- not to deal directly or through third persons, in shares of the Company on the basis of price sensitive information and during the period when trading window is closed,
- to properly maintain database of price sensitive information,
- to obtain pre-clearance before certain transactions of shares. For further details, please consult the Company Secretary department in this regard.

A woman with long dark hair, wearing a blue textured blazer over a white shirt, is shaking hands with a man whose back is to the camera. The man is wearing a dark suit jacket. They are in a professional setting with warm, orange-toned lighting. The woman is smiling slightly and looking towards the man. The background is blurred, showing some architectural lines.

# CORPORATE OPPORTUNITIES

Personal benefit cannot be above your responsibility towards the Company and you will not exploit for your own personal gain, opportunities that are discovered through the use of corporate property, information or position, unless the opportunity is disclosed fully in writing to the Company's Board of Directors and the Board of Directors declines to pursue such opportunity. If you are the person who is involved in or connected with development of new products/ processes, etc. which are in nature of invention then all the inventions made by you individually or jointly with others in the course of employment are the property of the Company.

You will not make any application personally either in India or outside for grant of patent for any such invention. You will assign the rights in all the inventions so made, in favor of the Company and will sign all the necessary deeds & documents for that purpose. You will not keep in personal custody or pass-on to other persons or competitors the confidential information pertaining to such inventions made during the period of employment or thereafter. For your personal gain/benefit, you will not deprive the Company of any existing or potential business opportunity.



## GIFTS & DONATIONS



The Company and its Associates shall neither receive nor make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits that are intended to, or perceived to obtain business or uncompetitive favors for the conduct of its business. To know further details in this regard, you may refer to Company Gift policy.

A photograph of a modern glass skyscraper at dusk. The building's facade is composed of a grid of large glass windows. Through the windows, the interior of several floors is visible, showing office desks, chairs, and warm interior lighting. The sky is a deep blue, and the overall scene is illuminated by the building's lights and the ambient light of twilight. The text "PROTECTION & USE OF COMPANY'S ASSETS" is overlaid in white, bold, sans-serif font in the center of the image.

# PROTECTION & USE OF COMPANY'S ASSETS

Associates have a duty to protect the assets of the Group and use them for only legitimate purposes. Any kind of theft, carelessness and waste have a direct impact on the profitability of the Group. The funds of the group shall not be used for any unlawful or illegal purposes.

To ensure that the assets of the Group are properly used and protected, Associates should inter alia do the following:

- exercise reasonable care to prevent theft, damage or misuse of the property.
- report actual or suspected theft, damage or misuse of Group's property to the Ethics & Compliance Team.
- use the Group's telephone system, email, written materials and other property primarily for business related purposes.
- safeguard all electronic programs, data, communications and written materials from inadvertent access by others.
- use Group property only for legitimate purposes and only to the extent authorized.

Group Property includes all data and communications transmitted or received to or by, or contained

in, the Group's electronic & telephonic system. Group property also includes all written communications. To the extent permitted by law, the Group has the ability, and reserves the right, to monitor all electronic and telephonic communication. These communications may also be subject to disclosure to law enforcement or government officials.

All the records of the Company whether in the form of paper documents, CDs, computer hard disks, email, floppy disks, microfiche, microfilm or any other medium is the property of the Company. All the records are statutorily required to be properly preserved and maintained. Loss or misappropriation of records is a serious matter and is subject to strict disciplinary action.

Usage of licensed software: All softwares used by the Associates on Company's equipment must be appropriately licensed. Use of illegal or unauthorized copies of any software, may constitute copyright infringement and invite potential civil and criminal liability. In addition, use of illegal or unauthorized copies of software may subject the Associate to disciplinary action, up to and including termination.

A worker in a blue uniform and yellow hard hat with a clear face shield is working in an industrial setting. The worker is looking towards the camera. The background is a blurred industrial environment with various pipes and machinery. The text "ENVIRONMENT HEALTH & SAFETY" is overlaid on the right side of the image.

ENVIRONMENT  
HEALTH & SAFETY



We give utmost importance to Environment Health and Safety (“EHS”) as one of the non-negotiable values for conducting business. We value human life above everything else and we expect the same to be reflected by our actions as responsible Associates. Creating a safe working environment for our Associates and other stakeholders is non-negotiable. Likewise, we expect our Associates to display the same values and ensure that they create a safe work environment for all Associates and channel partners working with us.

We shall further strive to protect our environment by using world class technologies. We will try to minimize and mitigate the impact of our operations that have or may have a hazardous impact on the environment. We encourage & call forward all our Associates to take an active part in the environment protection initiatives of the Company.

In order to protect the environment & ensure safety of others, Associates are expected to do the following:

- comply with all applicable EHS laws and regulations.
- ensure that the work environment is safe & prevent workplace injuries.
- assess the EHS impacts of a new activity before starting it and take all preventive measures for risk mitigation.
- eliminate unreasonable EHS risk from facilities, products, services and activities.
- as far as possible, reduce hazardous and toxic materials; prevent pollution; & conserve, recover and recycle materials, water and energy.
- continuously strive to improve our EHS systems.
- promptly alert your manager or EHS contact of any unsafe condition or act.

# ACCOUNTING & PAYMENT PRACTICES



## ACCOUNTING PRACTICES

The Company is required to give a true and fair picture of its assets and liabilities and profit/loss in all the published financial statements. This is a very strict obligation towards stakeholders and potential

investors. Therefore, the Company is responsible to fully and accurately record all the transactions in the Company's books and records in compliance with all applicable laws. All required information shall be accessible to the Company's auditors and other authorized persons and government agencies.

The Company prohibits recording false or misleading entries, unrecorded funds or assets, or payments without appropriate supporting documentation and approval, willful omissions of any Company transactions. The Company also discourages advance income recognition and hidden bank accounts and funds. Any willful material misrepresentation of and / or misinformation of the financial accounts and reports may lead to appropriate civil or criminal action under the relevant law.



## PROHIBITION OF INDUCEMENTS

Bribery is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Every Associate working for the Company should stay away from such illicit acts.

The Company is also committed to uphold anti bribery law like Prevention of Corruption Act, 1988 for India, The Bribery Act, 2010 of United Kingdom and / or any other applicable Anti-Corruption Law of the countries where we operate. The Company prohibits any of its Associates from offering, promising or giving any financial or other advantage to bring about the improper performance by another person of a relevant function or activity, to influence a foreign public official in performance of his or her official functions with an intention to obtain or retain business or an advantage in the conduct of business.



## POLITICAL CONTRIBUTIONS

The Company's funds or assets must not be used for, or be contributed to, political campaigns or political practices under any circumstances without the prior written approval of the Company's Board of Directors.

A “Public Official” includes anyone, whether elected or appointed, who performs public functions in any branch of national, local or municipal government anywhere in the world. It includes officials holding a legislative, administrative or judicial position of any kind. It also covers a person who exercises a public function, such as professionals working for public health agencies and officers in state owned enterprises

“Facilitation Payments” are small or minor payments made to secure or speed up routine legal government actions and it is prohibited under various anti-bribery acts.

“Associated Persons” means anyone who is engaged or paid to represent any entity in the Group and includes agents, representatives, intermediaries, introducers, sponsors, consultants, contractors & advisers or anyone else who acts on behalf of the organization whose ability to represent such entity is established or implied by the terms of their arrangement.

The relevant anti-bribery act shall be applied to deal with cases of bribery. Associates shall not offer

or provide an undue monetary or Facilitation Payments, other advantage to any person or persons, including public officials, customers, Associates, and the officials on legal duties in order to obtain or retain business. Agreements with consultants, brokers, sponsors, agents or other intermediaries shall not be used to channel payments to any person or persons, including public officials, customers or Associates, & thereby circumvent the Group’s policies regarding bribery and corruption.

A close-up photograph of a person in a dark blue suit jacket holding a white envelope over a wooden table. In the foreground, another person's hands are clasped together on the table. The scene is lit with warm, directional light, creating strong shadows.

## WHISTLEBLOWER CASES

If Associates have any concern related to the following, they should promptly report it to **stl.whistleblower@vedanta.co.in**:

- questionable accounting, accounting controls, auditing matters, or reporting of fraudulent financial information to our shareholders, government or financial markets; or
- grave misconduct i.e., like acceptance of favour from third party in cash or kind or any such conduct which results in violation of the law of the company or in a substantial mismanagement of Company resource which is proven, would constitute a criminal offence or reasonable ground for dismissal of the person engaged in such conduct; or
- conduct which is otherwise in violation of any law.

'Complaints' can also be sent to [stl.whistleblower@vedanta.co.in](mailto:stl.whistleblower@vedanta.co.in). The custodian of the E-Mail ID will be Director Management Assurance.

If a Complaint is received by any other executive of the company, the same should be forwarded to the Director Management Assurance at the above address.

The Company will protect the confidentiality and anonymity of the complainant to the greatest extent possible with an objective to conduct an adequate review. External stakeholders such as vendors, customers, business partners etc., have the opportunity to submit complaints, however, the Company is not obliged to keep complaints from external stakeholders confidential or to maintain the anonymity of them.

Post review, if the complaint is found to have been made with mala fide intention, stringent action will be taken against the complainant. We encourage Associates to report genuine complaints in good faith.

# PREVENTION OF SEXUAL HARASSMENT

Sexual Harassment  
Complaint Form

Harassment Complaint Form, I  
true and accurate and complete  
representations.

First

- implied or explicit threat about present or future employment status;
- interference with an employee's work or creating an intimidating or offensive or hostile work environment for an employee;
- humiliating treatment likely to affect an employee's health & safety.

The Company is committed to providing & maintaining a productive environment for all its Associates at various levels in the organization, free of sexual harassment and discrimination on the basis of gender. "Sexual Harassment" means and includes the following:

- physical contact & advances; or
- a demand or request for sexual favors; or
- making sexually colored remarks;
- showing pornography;
- any other unwelcome physical, verbal or non-verbal conduct of sexual nature;
- implied or explicit promise of preferential treatment in employment;
- implied or explicit threat of detrimental treatment in employment;

A committee as per the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 (the "Act") shall be formed for enquiry and investigation of such cases.

Strict actions leading up to termination of employment shall be taken against Associates found guilty by the committee as per the evidences, admissions and submissions given on record in the due course of the proceedings of the above mentioned committee. It is noteworthy that the committee will follow the principles of natural justice and due process of laws. In cases where it is found that the complaint was not made with fair intentions, strict disciplinary action shall be taken against the Complainant. If the nature of offence is grave, criminal proceedings may also be initiated against the Associate as per the said Act.

A wooden gavel with a gold band around its head, resting on a wooden sound block. The background shows a row of law books with gold lettering on their spines, slightly out of focus.

# FRAUD, MISCONDUCT & MONEY LAUNDERING

## A

Fraud is defined as an intentional act committed to secure unlawful or illegal gain or causing unlawful or illegal loss. Misconduct refers to violation of laws, regulations, internal policies & market expectations of ethical business conduct. Together they fall into the following categories of risk that can undermine public trust and damage the Company's reputation for integrity. The following acts shall be covered within the definition of fraud and misconduct:

- fraudulent financial reporting
- misappropriation of assets
- revenue of assets gained by illegal or fraudulent acts
- expenses or liabilities avoided by fraudulent act
- expenses or liabilities incurred for fraudulent or illegal acts
- other misconducts

The Company is committed to the elimination of these acts, through rigorous investigation of any suspected cases of fraud & misconduct, where such criminal act is proven, to ensure that wrongdoers are appropriately dealt with.

## B

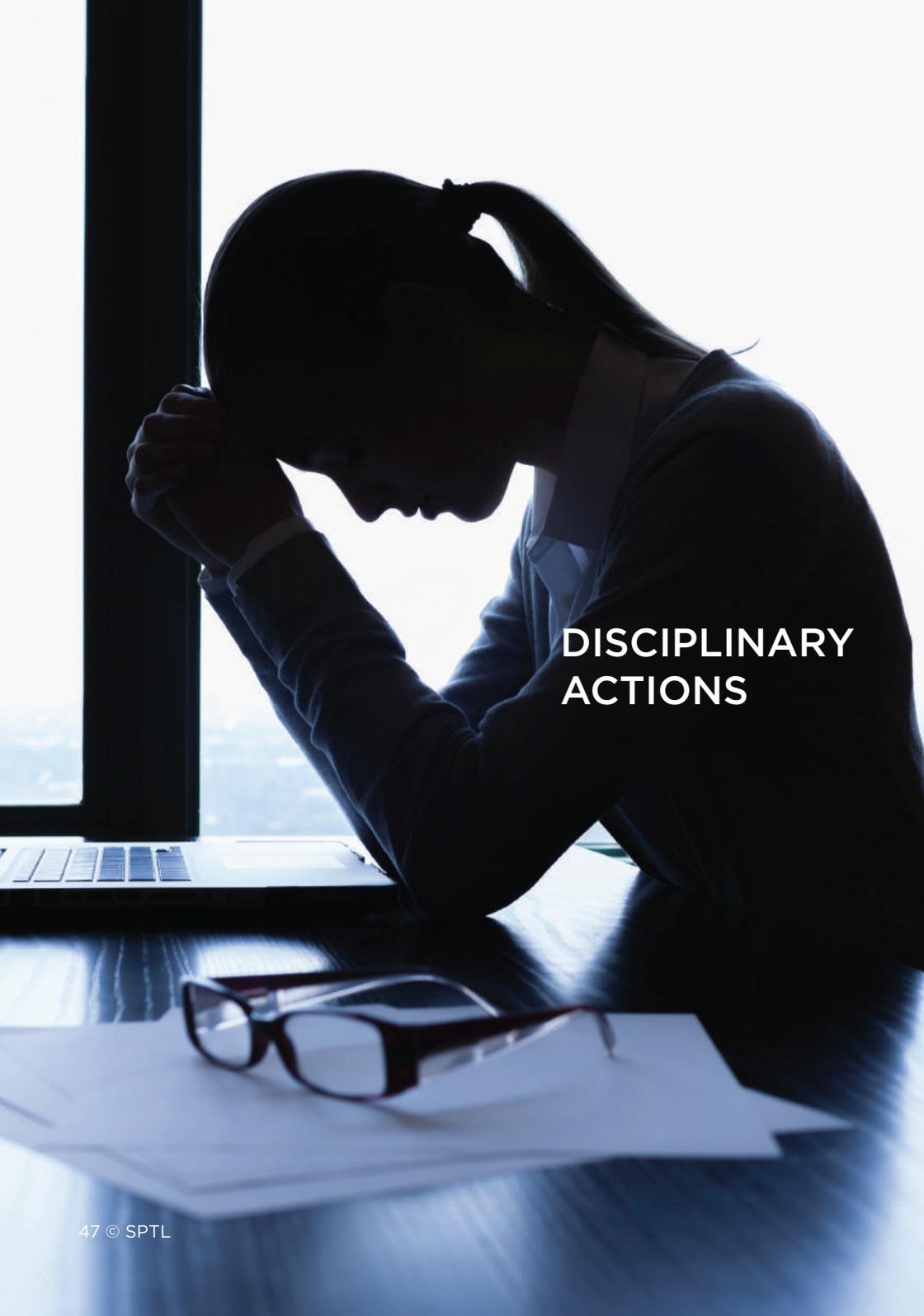
The Company also complies with the applicable money laundering regulations in each jurisdiction in which it operates & will co-operate fully with any investigation conducted by regulatory authorities involving potential money laundering by an Associate.



## PUBLIC COMMUNICATIONS

The Company gives high importance to its reputation and credibility. Anything said or written about the Company in the media has a direct impact on the reputation of the Company. Any material information that is made public should be correct, accurate, timely and consistent with our policy to protect confidential information. It should be disseminated as per the applicable legal & regulatory requirements.

No person, unless authorized shall make any material information public before any forum.



# DISCIPLINARY ACTIONS



All matters covered under this Code and all others which are important to uphold the spirit of this Code are of paramount importance to the Company, its stakeholders and its business partners, and are essential to the Company's ability to conduct business in accordance with its stated values. The Company will ensure prompt and consistent action against violation of this Code.

Disciplinary action may include immediate termination of employment or business relationship at the Company's sole discretion. Where the Company has suffered a loss, it may pursue its remedies against the individuals or entities responsible.

A photograph showing the silhouettes of four business professionals in a meeting room. They are gathered around a small table, with one man standing and leaning over. The room has large windows in the background, through which a bright sunset is visible, creating a strong backlighting effect. The scene is reflected on the glossy floor.

# ADMINISTRATION & WAIVER OF THIS CODE

The Code shall be administered and monitored by Sterlite Board of Directors. The Company is not in favor of granting any waivers. However, in a very exceptional situation, any waiver of any provision of this Code for a member of the Company's Board of Directors or CEO/COO must be approved in writing by the Company's Board of Directors and promptly disclosed. Any waiver of any provision of this Code with respect to any other Associate must be approved by the CEO in writing. Any act of ignorance/negligence amounting to violations of laws & regulations can create significant liabilities for the Associate, the Company or its directors. Every Associate is expected to cooperate in any internal or external investigations of possible violation of law, this Code or other Company policies and procedures.

This may force the Company to take disciplinary action against the persons responsible for non-compliance. Associates are expected to play a wider role by ensuring not only the legal compliances but also alerting about possible violations.



## CONCLUSION

This Code of Business Conduct and Ethics contains general guidelines for conducting the business of the Company consistent with the highest standards of business ethics. It doesn't claim to be exhaustive. There may be circumstances which are not covered in this Code. You are expected to act in best spirit of this code consistent with high standard of morality, integrity and ethics befitting your position. If you have any questions about these guidelines, please contact your manager or the Ethics & Compliance Team. All the Associates are expected to adhere to these standards. The Code shall be reviewed at regular intervals to ensure it remains applicable to the challenge we face in a dynamic business environment.

**Whistleblower Complaints**  
**[stl.whistleblower@vedanta.co.in](mailto:stl.whistleblower@vedanta.co.in)**  
**Helpline: 000-800-100-1681**

For queries contact: [ethics.team@sterlite.com](mailto:ethics.team@sterlite.com)