



Code of Conduct - We walk the talk

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Our Purpose Statement

SEIL's purpose and passion are to do good and play our part in creating a sustainable future. We deliver energy and innovative solutions that support development and create value – for our stakeholders and communities.

Values

CREATIVE INSIGHT	We innovate and solve complex problems.
COMMITTED	We walk the talk, do the right thing, and deliver on our promises.
CONNECTED	We value our people, forge strong partnerships, and care for our communities and the environment

We walk the talk

Here at SEIL, **we walk the talk.**

We are responsible for always acting with integrity, especially when we are called upon to make difficult choices. How we respond to these situations will determine how well we build and retain the trust of our key stakeholders. When we say we walk the talk, we mean we comply with all applicable laws / regulations, and we are committed to doing the right thing in our day-to-day actions, decisions and interactions guided by the set of principles in this Code.

This Code is a statement of our commitment to acting with integrity and it sets out the expected standards of behaviors for every employee and serves as a foundation for all other Company policies, procedures and guidelines.

Who must follow our Code?

- All Board Directors of the company.
- All employees of the Company including all subsidiaries, affiliated and associated companies.

SEIL will not grant waivers under the provisions of the Code without good reason. Employees who violate the law, this Code or Company policy are subject to disciplinary action in accordance with applicable laws and company procedure.

Your responsibilities as an employee

MAKE SURE YOU

- Obey all laws and regulations that apply to your work.
- Understand and adhere to the letter and spirit of this Code and Company policy.
- Complete all required training to understand your responsibilities.
- Speak up if there are any concerns about work-related behavior that may be a violation of the law, this Code or Company policy.
- Cooperate fully in all internal and external audits and investigations.

Leadership responsibilities

Leaders at SEIL have additional responsibilities. If you manage other employees, or are in a position of leadership, you must lead by example and always hold yourself to the highest standards of conduct.

MAKE SURE YOU

- Communicate the letter and spirit of the Code to your colleagues and your employees.
- Ensure employees reporting to you are trained in Company policy and procedures.
- Play an active part in assuring the quality of the work product of your employees and in the fairness and honesty of their communications with clients, colleagues and other business partners.
- Use adherence to the Code and Company policy when evaluating and recommending compensation for your employees.
- Encourage your employees to report a mistake or conflict of interest, raise a concern or to discuss a difficult business choice through the various channels available.
- Respond promptly and effectively to concerns raised or when mistakes or misconduct are discovered.
- Notify HR Head/ CFO / CEO when you are aware of a violation or potential violation of the law, this Code or Company policy.

How to make ethical business decisions

Whenever you make a business decision, ask yourself:

- Is it legal?
- Is it consistent with this Code and Company policy?
- Is it based on a thorough understanding of the risks involved?
- Will it maintain trust with clients, shareholders, regulators, our communities, and colleagues?
- Would it maintain our good reputation if it appeared on the television, the newspaper, or the internet?

If the answer to any of these questions is no, stop and speak up.

Speaking Up

It is foreseeable that you will encounter difficult choices in the course of your work and we recognize that everyone makes mistakes from time to time. Here, at SEIL, we are committed to choosing our actions with care and correcting our mistakes promptly. You should not hesitate to raise concerns or to seek guidance. Your prompt action will help us build and retain trust with our stakeholders.

How to Speak Up

To seek guidance, reach out directly to a supervisor or a representative from Compliance.
To report your concerns, reach out directly to the Head of HR OR Whistleblowing platform:

Telephone: (91) 124 389 7820 Email: wb@seilenergy.com

Address: SEIL Energy India Ltd., 5th Floor, Tower C, Building No.8, DLF Cybercity, Gurgaon - 122002

Webpage: <https://www.seilenergy.com/>



No retaliation

Here at SEIL, we do not tolerate any retaliation against any colleague who raises a concern about a violation of the law, this Code or Company policy in good faith. Examples of retaliation may include termination, a reduction in pay, a negative change in job responsibilities, intimidation, or any other material change in a colleague's conditions of employment.

However, a colleague who makes an allegation he or she believes to be false will be in violation of this Code and will be subject to disciplinary action in accordance with applicable laws and internal procedure. Also, reporting a concern does not relieve a colleague of accountability for misconduct.

Walking the talk with each other

WE TREAT EACH OTHER FAIRLY AND WITH RESPECT

SEIL is committed to maintaining a work environment where all employees are treated with dignity and respect. We do not tolerate any form of harassment of our employees for any reason. We hire and reward all employees based on merit and believe in providing development opportunities for employees to achieve their full potential.

MAKE SURE YOU

- Comply with all applicable labor and employment laws in all jurisdictions where we operate.
- Make decisions to employ, develop or promote employees based on merit and business considerations in a fair and transparent manner.
- Contribute to a work environment that is free from harassment of any form by according to respect and dignity to all.
- Immediately report any inappropriate behavior to your supervisor or Group Human Resources & Organisational Development.

WATCH OUT FOR

- Behaviour, comments, jokes, or materials which others may find offensive or humiliating.
- Threats of retaliatory action against an employee for reporting or threatening to report any act of harassment.
- Discrimination based on age, race, gender identity, sexual orientation, religion, family, or marital status.

We Protect Personal Information

We respect the privacy of individuals and protect the personal information of our colleagues that we collect and process for employment, remuneration and development and we apply the same standard of care when we collect, use or otherwise process the personal information of our clients and business partners and comply with the applicable laws.

MAKE SURE YOU

- Observe the applicable laws and Company policy on collecting, using, protecting, and retaining personal information.
- Take steps to protect personal information through appropriate means.
- Immediately report any loss or inadvertent disclosure of personal information to your supervisor, HR Head.

WATCH OUT FOR

- Attempts to collect, use, transmit or retain personal information without appropriate consent.



Walking the talk with our clients & partners

WE DO NOT BRIBE

We do not accept, offer, give or promise bribes in any form, for any purpose to anyone. We also prohibit any form of facilitation payments that may be characterized as a bribe. We do not authorize third parties to engage in bribery on our behalf under any circumstances. Our employees will not be penalized for complying with this requirement and the Code in general even if such compliance may adversely affect the achievement of our targets.

MAKE SURE YOU

- Do not accept, give, offer, or promise anything of value to a client, prospect, government official unless it is legal, reasonable, and free of any intent or understanding or appearance that it will or could influence a business decision or government action.
- Communicate our strict stance on bribery to business partners and third parties we work with.
- Immediately report any potential or actual instances of bribery or corruption and require your business partners to do the same.

WATCH OUT FOR

- Requests for facilitation payments, payments that appear suspicious, not tied to a legitimate business purpose or unrelated to a transaction.
- Requests for benefits from clients or business partners.

WE DEAL WITH GOVERNMENT OFFICIALS RESPONSIBLY

We are committed to meeting the higher legal, regulatory, and contractual requirements that apply when we work or partner with governmental bodies or authorities around the world.

These requirements may apply to bidding, accounting, invoicing, and subcontracting, employment practices, contract performance, client service, gifts, hospitality, travel and other matters.

MAKE SURE YOU

- Determine whether the client or business partner you are working with is a government- related entity.
- Follow all laws, regulations, and contractual provisions applicable to the business relationship between our Company and every government client you work with.
- Communicate these requirements to all colleagues and third parties involved in the work and ensure they follow those rules.

WATCH OUT FOR

- Any temptation to provide other than reasonable entertainment to a government client before learning that client's rules on entertainment. Some government clients have rules that prohibit or limit entertainment.

WE WORK WITH TRUSTWORTHY BUSINESS PARTNERS & REPRESENTATIVES

We work with business partners and representatives who are committed to doing business ethically.

We choose and conduct due diligence with our partners and representatives carefully because their actions can reflect our Company's reputation.

MAKE SURE YOU

- Conduct the necessary due diligence on business partners and representatives before you begin work on a new matter or engage their services.
- Never ask or engage in helping someone else do an act that you are not permitted to do yourself.
- Remain alert to the possibility that a business partner or representative could be subject to trade sanctions; and that you raise such situations to your manager or Head HR OR Whistleblowing platform immediately before commencing any business relationship.
- Report all actual or potential instances in which a representative could be engaging in corrupt or unethical behavior while representing SEIL.

WATCH OUT FOR

- Third party representatives or business partners that have been subject of previous enforcement action(s) for unethical conduct or corruption-related offenses.

WE COMPETE ETHICALLY

We compete for business ethically and we prohibit any arrangements with competitors that could adversely affect our reputation. We comply with all laws that protect competition and prohibit anti-competitive behavior in the locations where we operate.

MAKE SURE YOU

- Understand what is considered anti-competitive behavior and ensure that you do not engage or allow colleagues to engage in such conduct.
- Do not engage in formal or informal discussions on commercially sensitive issues or exchange such information or reach any agreements on such topics with competitors.
- Do not obtain or solicit competitively sensitive information improperly.

WATCH OUT FOR

- Requests to enter into agreements with competitors to fix prices, payment terms or whether to deal with a specific customer or not.

Walking the talk within our Company

WE AVOID CONFLICTS OF INTEREST

A conflict of interest is a situation in which competing loyalties could cause you to take advantage of a personal benefit for you, your friends, or your family at the expense of SEIL or our business partners. Conflicts can arise in different situations and your responsibility is to avoid these situations when they arise, including circumstances that may reasonably give rise to the appearance of a conflict.

MAKE SURE YOU

- Identify and disclose actual or apparent conflicts of interests promptly to your manager or Head HR OR Whistleblowing platform.
- Do not participate in a decision-making process concerning existing or potential business relationships that involve your relatives, family members or close friends.
- Do not engage in any work or work or accept any employment that could harm the Company, interfere with your work, or embarrass the Company.
- Do not pursue business opportunities for yourself that would be appropriate opportunities for the Company.

WATCH OUT FOR

- Offers of gifts, entertainment or other favours from a supplier or contractor that could create the appearance of improper influence.

WE TREAT GIFTS, ENTERTAINMENT AND HOSPITALITY RESPONSIBLY

In the appropriate circumstances, a modest gift may be a thoughtful gesture of appreciation, or a meal may be an appropriate setting for a business discussion that strengthens a client relationship. However, when not given or accepted carefully, gifts and entertainment may create the appearance of improper influence, violate the standards of our business partners, and even constitute violations of the law.

MAKE SURE YOU

- Do not give or accept anything of value unless it is legal, reasonable, and free of any intent, understanding or appearance that will influence a business decision or government action.
- Do not give, promise, or offer any benefit including a gift, entertainment, or hospitality to a government official without the necessary pre-approvals.
- Never give a gift of cash or cash-equivalents.

WATCH OUT FOR

- Situations that could embarrass you or the Company, including entertainment at inappropriate places.
- Business partners that appear to be privately held but are considered government entities and be subject to stricter rules.

WE SAFEGUARD COMPANY ASSETS & INFORMATION

We safeguard Company assets, and we are personally responsible for protecting and using these with care. Company assets can include our vehicles, funds, facilities, equipment, information systems and intellectual property. We are also committed to preserving confidentiality and are always mindful of how we collect, process, disclose and otherwise transmit information in our possession or control.

MAKE SURE YOU

- Use Company assets only for legitimate business purposes.
- Handle Company information with care always.
- Protect intellectual property by sharing it only with authorized parties and respecting all copyright and other intellectual property laws.
- Only disclose confidential information externally after entering into a non-disclosure agreement that has been approved by Group Legal.

WATCH OUT FOR

- Company assets that are left unsecure when not in use.
- Internet use or communications that could introduce viruses to or breach firewalls of the Company information systems.
- Attempts to access or disclose information without a legitimate business purpose.

WE WORK WITH ETHICAL SUPPLIERS

Our relationships with our suppliers are important to our success. We choose suppliers that share our commitment to ethical business practices, provide superior service on fair and reasonable terms and that follow the law.

MAKE SURE YOU

- Conduct the necessary due-diligence and choose suppliers based on their track record, the quality of their product or services, and the competitiveness of their prices and other terms and conditions.
- Avoid suppliers who have engaged in unlawful or unethical conduct or who could damage our reputation.
- Disclose any actual or potential conflict of interest if you are involved in choosing the supplier.
- Avoid any favour from a supplier or potential supplier which might create the appearance of personal benefit to you from the choice of supplier.

WATCH OUT FOR

- Pressures to choose a supplier that does not offer competitive products, services, prices or terms.
- Supplier practices that could jeopardize our reputation such as violations of anti-bribery and corruption laws, labour, human rights or environmental regulations.

WE DO NOT FACILITATE MONEY LAUNDERING OR FINANCIAL CRIMES

We are committed to complying with anti-money laundering laws. Money laundering is conduct designed to conceal the origin or nature of the proceeds of criminal activity. All employees must take reasonable and appropriate actions to identify and assess the integrity of our business partners. Keep yourself informed of possible money laundering red-flags and if a red-flag appears during a transaction, speak to a manager or Head HR or Whistleblowing platform.

MAKE SURE YOU

- Take reasonable and appropriate actions to assess the integrity of our business partners, customers, and suppliers.
- If you are involved with receiving or handling funds, follow procedures relating to acceptable forms of payment.
- Follow applicable laws on filing suspicious activity reports by notifying a supervisor Head of HR OR Whistleblowing platform concerning activity that could be a sign of money-laundering.

WATCH OUT FOR

- Attempts to tell or tip off a client about money-laundering suspicions; in some countries this is a criminal offense.
- Clients who have been the subject of financial crime or money laundering allegations, or who refuse to properly document a transaction or relationship.
- Transactions that lack a business purpose or consistency with a party's business strategy.

WE MAINTAIN ACCURATE RECORDS, CONTRACTS AND SOUND INTERNAL CONTROLS

We depend on complete and accurate business records to fulfill our responsibilities to shareholders, clients, suppliers, regulators, and others. We maintain business records – including travel and entertainment records, contracts, emails, memos, presentations, reports, and accounting records – that are complete, fair and accurate and we do so in accordance with our system of internal controls.

MAKE SURE YOU

- Maintain accounting and business records that accurately reflect the truth or the underlying event or transaction and as required by our internal controls.
- Only sign documents, including contracts, that you have reviewed and are authorised to sign and believe are accurate and truthful.
- Execute financial transactions only with appropriate authorisation and record them in compliance with our accounting practices.
- Retain, protect, and dispose of records according to internal records retention schedules.
- Keep aware of and adhere to internal controls that apply to your work.

WATCH OUT FOR

- Usage of software that generates but does not retain business records or communications.
- Unreasonable estimates or assumptions, exaggeration, derogatory language, and other expressions that can be taken out of context.
- Attempts to destroy, discard, alter, misfile, or hide records.
- Requests to enter into side agreements or other "off-the-book" arrangements.

Walking the talk within our communities

WE ARE GOOD CORPORATE CITIZENS

We conduct our business responsibly and we are committed to respecting and promoting human rights, managing the impact of our operations and supporting the communities we operate in to achieve long term sustainable success. We demonstrate our commitment to corporate social responsibility, fostering environmental stewardship and improving the quality of life for the communities in which we operate through charitable contributions and community investments.

MAKE SURE YOU

- Follow the Company's procedures for making community investments and charitable contributions.
- Engage our stakeholders and nurture open communication in the communities that we operate in.
- Assess and responsibly manage the impact of our business to the community.
- Do not engage in any form of forced labour or hire employees below the legal working age in the jurisdiction where you operate.

WATCH OUT FOR

- Third party representatives or business partners who have engaged in human rights violations.
- Requests or attempts to embark on any single or collective charitable contributions or community investments that are not aligned with our Company's policy for charitable contributions.

WE ARE POLITICALLY NEUTRAL

We are politically neutral, and we do not contribute funds or non-monetary support, including lobbying, to any political party, politician, elected official, or candidate for public office in any country or jurisdiction. Our employees may elect to participate in politics in their individual and personal capacity but may not do so on Company time or with Company assets and resources.

MAKE SURE YOU

- Comply with the Code and applicable laws in the jurisdictions where we operate when dealing with a political party, politician, or candidate for public office.
- Obtain appropriate approval from Head HR OR Whistleblowing platform before participating in the capacity of a SEIL representative, in any political event or activity organized by or on behalf of a political party or politician.
- Only participate in events or activities organized by a political party, politician, or candidate for public office if it is for a legitimate business purpose or a (CSR) event that is aligned with SEIL's CSR policies and initiatives.

WATCH OUT FOR

- Involvement in political activities or making contributions that include using SEIL facilities or resources for a purpose that does not involve society at large.
- Attempts to use our position in SEIL to influence others to make political contributions or support any political parties or politicians.

WE MANAGE OUR HEALTH, SAFETY, SECURITY AND ENVIRONMENTAL RESPONSIBILITIES AS OUR FIRST PRIORITY

We are committed to maintaining a safe and healthy workplace for the benefit of all employees and visitors to our office premises and facilities. We proactively manage the HSSE risks associated with our activities. We believe in operating our facilities in a responsible manner, protecting the environment as well as promoting environmentally friendly waste management practices.

MAKE SURE YOU

- Always comply with all HSSE policies, standards, and practices.
- Maintain good housekeeping and pollution prevention practices.
- Be responsible for our safety, health, and welfare while at work using suitable appliances or personal protective equipment in compliance with applicable requirements and guidelines.
- Prevent any unsafe HSSE act and / or conditions; or refuse to work in an unsafe work environment which may lead to imminent risk to ourselves and / or others.
- Speak up and raise all HSSE incidents and non-conformance.

WATCH OUT FOR

- Employs at work who may be incapacitated by use of alcohol or drugs (whether illegal, legal, or prescribed).
- Work in an unsafe work environment or unsafe manner.
- Interference or misuse of any appliance, personal protective equipment or other means provided for securing safety, health, and welfare of persons at work.

This Code is not an employment contract or guarantee of future employment. It does not provide any additional rights to any colleague, client, supplier, competitor, shareholder or any other person or entity. The Company may amend the Code from time to time.