



**S. P. Singla Constructions Pvt. Ltd.**

*Building Infrastructure for future...*

**CORPORATE OFFICE**

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**REGISTERED OFFICE**

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CIN No.: U45201DL1996PTC114775

# CODE OF CONDUCT POLICY



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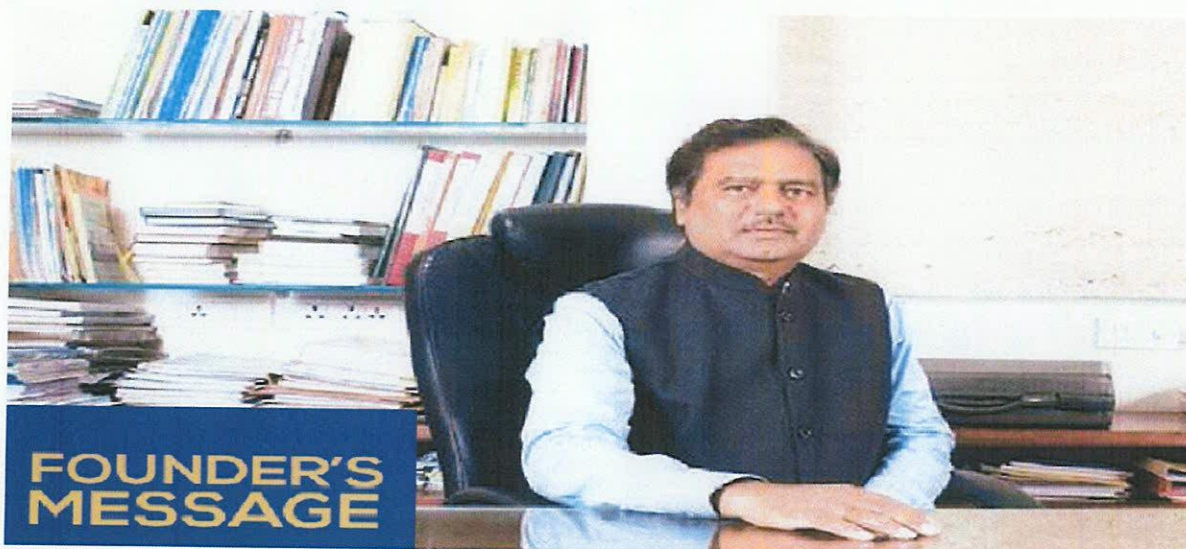


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## I. Founder's Message



We did the very first project in 1996, which was a trivial bridge over the Yamuna river. Since then, the company has conscientiously grown whilst retaining 100% ownership with no major debts.

The first break came in 2000 as the state of Chhattisgarh was formed and the company won their first big tender. In 2006, things went a step further as the company built the longest Extradosed Bridge in Bihar across the Ganges valued at Rs. 700 Crores. To its credentials, the company also boasts construction of the largest bridge over Bramhaputras in Assam at Tezpur.

Through the years, the company has built its reputation as a highly sought after company when it comes to building critical and time bound bridges in India. Its expertise and repertoire is renowned but not limited to Cable Stayed Bridges, Extra-Dosed Bridges, Cantilever Bridges and Steel Superstructure Bridges along with Railway Over/Under Bridges, Metro Rail Corridors, Bus Corridors and Highways amongst others. Since it began operations, the company has built more than 300 Bridges across India.

Under its long list of accolades and achievements, the company is credited with building India's longest multi-span extra-dosed bridge in the state of Bihar and the second longest multi-span extra-dosed bridge in the state of Uttar Pradesh. India's longest box pushing railway under bridge, built at one of the busiest railway tracks in New Delhi. The company is also credited with the expertise to build deep well foundations up to 60 meters in depth and pile foundation up to 65 meters depth in coastal waters and rivers.



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Currently, the company is working on nationally important projects and is hailed as the foremost super-specialist in bridge constructions, with companies like Gammon India, PNC Infratech and IL&FS Engineering Services vying for Joint Ventures with the company to undertake mega projects in India and abroad.

In total, the company is working on 30 projects all over the country. With a mission to be the pioneers of bridge constructions through innovation and knowledge, the company have certainly arrived at the stature. Starting small and growing steadily, S.P. Singla Constructions Pvt. Ltd. serves as an inspiration to many and despite coming a long way, it has a longer road ahead with aims to cross US \$ 1 Billion in the coming days.

Sh. S.P Singla  
Chairman and Managing Director





## II. APPLICABILITY

This code of Conduct is applicable to all the employees in the hierarchy of S P Singla Constructions Pvt. Ltd.

## III. CODE OF CONDUCT

### i) Honesty, Integrity, Ethics

All SPS-ites shall act in conformity with professional standards of personal integrity, honesty & ethical conduct, especially when on Company's business, at Company sponsored events, or when representing the company.

Ethical conduct is one that is free from fraud & deception and includes actual or potential conflicts of interest between personal advantages against organization's needs and/or values.

### ii) Respect for Individuals

SPS-ites shall treat their colleagues & business associates with dignity & respect, irrespective of caste, creed, gender, religion/region, nationality, appearance or any disability.

Superiors shall encourage their subordinates/colleagues to express their professional views in meetings / discussions, candidly and without fear. Feedback on performance will be provided as far as possible in private. They shall treat them with equity & fairness.

SPS-ites shall not use abusive or offensive language, tone or gesture with their colleagues or business associates. Superiors shall not insult/demean their subordinates.

SPS-ites shall commit to create an environment which is free of any type of sexual harassment & abide by the Policy for Prevention of Sexual Harassment (POSH) at the work place. Each employee shall strive to protect women employees from any act of sexual harassment and take appropriate action whenever required.

### iii) Sharing of Official Information

SPS-ites shall not divulge or communicate in any manner sensitive/confidential information to third parties.





SPS-ites shall not speak ill about the organization to any external agency which would tarnish the image of the organization.

Similarly, SPS-ites shall desist from indulging in rumor mongering/loose talks, about the organization that is detrimental to the Company's interest.

**iv) Maintaining Confidentiality**

In addition to the above mentioned, the employees shall maintain the integrity of internal communications. Care shall be taken to mitigate various risks emanating out of communication such as misrepresentation of facts/ events, leakage of price sensitive information, unfavorable reports on developments in the Company, inconsistent communication at the times of crisis.

All the employees have been entrusted with the duty to keep such information strictly confidential and use it only for proper purposes in accordance with the law. This would apply during the course of employment as well as post separation.

**v) Professional Engagement & Public Advocacy**

SPS-ites are encouraged to associate themselves with activities of professional bodies to enrich their knowledge and also help in building organization's image.

**vi) Use of Company Assets & Brand Logo**

SPS-ites shall not exploit the organizational resources for one's own personal gain/pecuniary advantage. In discharge of official duties, one shall strive for effective and judicious use of resources entrusted to them. Resources include both tangible assets like equipment and facilities etc. Or intangible assets like designs, information, software, or network with suppliers/customers, etc.

SPS-ites are entrusted with the duty of using the brand logo without modifying the same. All the employees shall abide by the guidelines for Brand applications/usages including visiting cards. Deviations from the specific logo templates will not be permitted.

**vii) Use of Information Technology**

SPS-ites shall judiciously use the Information Technology facilities provided to them.

The usage of E-mails forms a major portion of the network usage. In order to make the best utilization of the resources and to prevent undesirable fallouts





resulting from the use of E-mails, proper monitoring should be done and one shall not share the data with the third parties. Also employee should forbid from using of pen drives/hard disks to collect data for personal use.

**viii) Working Environment**

SPS-ites shall not engage in any activity that is likely to result in disturbing peace & harmony in the workplace or engage in activities that are likely to create tension, bitterness or confusion in the minds of colleagues.

Also, all SPS-ites should project a professional image and create a pleasant work environment and to enforce a strong sense of integrity.

Superiors shall endeavour to create a climate in ensuring the above.

**ix) Environment, Health & Safety (EHS)**

SPS-ites shall endeavour to create a safe working environment by following the policies and procedures as laid down in the Corporate Environment, Health & Safety Management Systems framework.

Towards this, all the employees shall:

1. Incorporate EHS considerations in all business decisions.
2. Ensure compliance to statutory and other requirements.
3. Prevent adverse environmental impacts and occupational health and safety risks.
4. Conserve natural resources, minimize waste generation and environmental emissions.
5. Impact structured training for employees for effective EHS performance SPS-ites shall strive to keep ones own place and surrounding work place clean and hygienic.

**x) Sustainability**

SPS-ites are committed to fulfilling our economic, environmental and social responsibilities while conducting business. All the SPS-ites shall strive to conserve natural resources, and achieve sustainable growth, through a culture of trust and care.



**xi) Corporate HR policy**

People are the most valuable resources that contribute towards realizing the dynamic vision of the Company. Hence in consonance with the HR functions, we shall be relentlessly committing ourselves to:

1. Acquiring, developing and retaining a pool of high-calibre talent
2. Enabling and empowering our employees to be creative and innovative
3. Establishing systems and practices for maintaining transparency, fairness and equality.
4. Creating a culture of continuous learning and competitiveness.
5. Respecting ethics, values and good governance

**xii) Gift Policy**

SPS-ites shall not accept gift of any kind which would result in any violation of law, commitment to mutual respect and result in conflict of interest. Subject to this, acceptance of gifts appropriate to the circumstances, promotional items with the logo and/or nominal value, occasional business meals is allowed, provided that they are not excessive or create an appearance of impropriety, do not violate this policy.

**For and on behalf of**  
**M/S S P Singla Constructions Pvt. Ltd.**

**(Director)**