



SPS Construction India Pvt. Ltd.

Building Infrastructure for future...

[Formerly Known as S P Singla Constructions Pvt. Ltd.]

CODE OF CONDUCT POLICY



SPS Construction India Pvt. Ltd.

Building Infrastructure for future...

[Formerly Known as S P Singla Constructions Pvt. Ltd.]

INDEX

- I. FOUNDER'S MESSAGE
- II. APPLICABILITY
- III. CODE OF CONDUCT
 - i. HONESTY, INTEGRITY, ETHICS
 - ii. RESPECT FOR INDIVIDUALS
 - iii. SHARING OF OFFICIAL INFORMATION
 - iv. MAINTAINING CONFIDENTIALITY
 - v. PROFESSIONAL ENGAGEMENT & PUBLIC ADVOCACY
 - vi. USE OF COMPANY ASSETS & BRAND LOGO
 - vii. USE OF INFORMATION TECHNOLOGY
 - viii. WORKING ENVIRONMENT
 - ix. ENVIRONMENT, HEALTH & SAFETY
 - x. SUSTAINABILITY
 - xi. CORPORATE HR POLICY
 - xii. GIFT POLICY



SPS Construction India Pvt. Ltd.

Building Infrastructure for future...

[Formerly Known as S P Singla Constructions Pvt. Ltd.]

I. Founder's Message



Since 1996, our Code of Conduct and strong Core Values have guided our Company to uphold the highest ethical standards. It is that commitment, lived daily by our people, that allows us to successfully build the infrastructure of the future.

SPSCIPL Code of Conduct brings together a number of Company's policies, provides additional guidance on legal and ethical compliance, and implements systems to ensure compliance. SPSCIPL provides a positive and ethical work environment that supports doing what is right, respecting others, and performing with high standards.

The SPSCIPL Code of Conduct outlines our commitment to each of our stakeholders, including the communities in which we operate, and is our guiding light when we are sometimes faced with business dilemmas that leave us at ethical crossroads. The Code is also dynamic in that it has been periodically refreshed in order to remain contemporary and contextual to the changes in law and regulations. However, it remains unaltered at its core.

Our success as a business entity has been defined by the powerful commitment and adherence to the core values and principles expressed in this Code, by all our employees, directors and partners. I trust every colleague of the company will continue to not only comply with the laws and regulations that govern our business interests around the world, but will continue to set new standards of ethical conduct that will generate deep respect and inspire emulation by others.

Sh. S.P Singla
Chairman and Managing Director



SPS Construction India Pvt. Ltd.

Building Infrastructure for future...

[Formerly Known as S P Singla Constructions Pvt. Ltd.]

II. APPLICABILITY

This code of Conduct is applicable to all the employees in the hierarchy of SPS Construction India Pvt. Ltd (Formerly known as SP 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 as 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.



SPS Construction India Pvt. Ltd.

Building Infrastructure for future...

[Formerly Known as S P Singla Constructions Pvt. Ltd.]

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



SPS Construction India Pvt. Ltd.

Building Infrastructure for future...

[Formerly Known as S P Singla Constructions Pvt. Ltd.]

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 SPS Construction India Pvt. Ltd.**

Sd/-

(Director)