



STU

Code of
Business
Conduct
& Ethics

Gifts and **Entertainment**



Gifts

As part of our overriding philosophy and good governance, it is not acceptable to exchange gifts with business partners/ customers and authorities since this may imply influence or the potential to influence in favour of the employee/ Company and compromise objectivity in decision making.

However the Company recognizes that it may be customary to receive and give nominal gifts to our business partners and colleagues on special occasions like marriages, celebrations etc. as long as such gift is of insignificant commercial value, i.e. Gift value up to Rs. 2500/- per person/ entity and not more than once in 12 months to/ from same source can be within the norms of the Company's gift policy and is not meant to influence decision making in any manner.



It is prohibited to offer loans, cash or personal cheques, gifts that may be illegal (anything offered to a government official in breach of local or international bribery laws) and gifts of an inappropriate nature. The test to be applied while giving gifts is whether they could be intended, or even be reasonably interpreted, as a reward or encouragement or inducement for a favour or for preferential treatment. If the answer is yes, the gifts are prohibited.



Never pay for a gift, directly or indirectly, in order to avoid complying with entity's code of conduct

You should make every effort to refuse or return gifts having commercial value. Under exceptional circumstances, if gifts are to be accepted, then the same should be reported to the immediate superior and deposited with the Company Secretary. Perishable gifts items may be distributed in office. Company Secretary should circulate details of such gifts to the Company CEO on a quarterly basis.



Never offer gifts, directly or indirectly, in a bid or tender.



Entertainment

Bona fide hospitality and promotional, or other business expenditure which seeks to improve the image of a commercial organization, better to present products and services, or establish cordial relations, is recognized as an established and important part of doing business. It is your responsibility to use good judgment in this area.

As a general rule, you may give or receive entertainment to or from customers or suppliers only if the entertainment would not be viewed as an inducement to or reward for any particular business decision. Therefore, the sums involved in this regard must be nominal.

Entertainment expenses should be properly accounted for on expense reports.

This policy should be followed in letter and spirit.

If any team member has any Questions about this policy, they are advised to contact the Company Secretary/HR Head.





Corporate Social **Responsibility**

STL believes that the only way to do business is by being responsible, socially and environmentally.



In partnership with the Government of India, and other development players (both national and international) the Company can positively impact and contribute to the realization of integrated development for rural, semi-urban and urban areas. Sustainable development of our businesses is dependent on sustainable, long-lasting and mutually beneficial relationships with our stakeholders, especially our neighbours and communities the Company work with.

The law mandates specific contribution towards CSR activities and the Company has framed a Policy in line with the same. However, the Company ensures that we go beyond compliance to benefit our communities in the most sustainable and long-term manner. STL's CSR initiatives are a vital component of its sustainability practices and help us create value for communities through programmes that deliver impact.

CSR is an essential part of the Company's business plan and is considered as its responsibility to address the concerns of communities. The Company leverages its expertise in connectivity to provide innovative and unique solutions to pressing social and environmental challenges in our focus areas.

STL also believes in Individual Social Responsibility of every employee, to engage in socially and environmentally conscious behaviour, with 'do no harm' principle at its core.



If you know of or suspect a violation of this Code, immediately report the conduct to your supervisor. Your supervisor will contact the Secretarial / Legal Department, who will work with you and your supervisor to investigate your concern. If you do not feel comfortable reporting the conduct to your supervisor or you do not get a satisfactory response, you may contact the Secretarial / Legal Department directly.

Report known or suspected violations of the Code using any of the following means:

Web-based Portal	www.vedanta.ethicspoint.com
Toll-Free number	000 800 100 1681
Email	stl.whistleblower@sterlite.com
Mailing address	Group Head – Management Assurance, Vedanta, 75 Nehru Road, Vile Parle (E), Mumbai 400 099 Tel No. +91- 22 – 6646 1000, Fax No. +91- 22 – 6646 1450

Employees submitting this information need not leave their name or other personal information and reasonable efforts will be made to conduct the investigation that follows from the report from an employee in a manner that protects the employee's identity.

All reports of known or suspected violations of the law or this Code will be handled sensitively and with discretion. Your supervisor, the Secretarial / Legal Department and the Company will protect your identity to the extent possible, consistent with law and the Company's need to investigate your concern.



Zero Tolerance on Retaliation

STL prohibits retaliation against an employee who, in good faith, seeks help or reports known or suspected violations. Any reprisal or retaliation against an employee because the employee, in good faith, sought help or filed a report will be subject to disciplinary action, including potential termination of employment.



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