

BPTP CODE OF CONDUCT POLICY

CONTENTS

1. Preview
2. Code of Conduct
3. IT related code of conduct
4. Misconduct at work
5. Disciplinary actions for breach of Code of Conduct
6. Procedure to report unethical practices - For Employees
7. Procedure to report unethical practices - For Suppliers

For BPTP International Trade Centre Limited

Signatory

1. PREVIEW - BPTP CODE OF CONDUCT

At BPTP, it is our aim to establish ourselves as the most trusted and admired real estate company in the country. Our vision is not limited to becoming the most successful company in the sector, but to become the obvious partner of choice in the process. We are constantly striving to gain the trust and confidence of the people we work with and the people we work for. At the core of our organization are a set of guiding values and a commitment to act in a responsible, ethical and lawful way. It is our mission to embody each of these values in our functioning, constantly.

- **Agility:** We are a dynamic & flexible organization that is always on the ball and ready for a challenge.
- **Team Spirit:** Our Company celebrates the spirit of inter-dependence and cohesiveness.
- **Learning:** We treat every day as an opportunity to learn; as individuals and as an organization.
- **Meritocracy:** Ours is an environment that nurtures and rewards talent and performance.
- **Community:** We believe in the power of the collective; where individual action makes an impact on the larger community.

Trust is fundamental to everything we do. **Working in The BPTP Way** means we must always act with integrity to ensure we are trusted by our customers, colleagues, business partners and the community in which we work.

Our Code of Conduct sets out what we expect from every single person working for and with BPTP. The Code of Conduct helps us all make informed decisions and tells us where to go for more information.

1.1. **What is the Code of Conduct?**

The Code of Conduct is our central policy document, outlining the requirements that every single person working for and with BPTP must comply with, regardless of location.

1.2. **Who is the Code of Conduct for?**

Our Code of Conduct is for all employees and retainers of BPTP including its subsidiaries, joint ventures and associate/group companies

1.3. **What are the consequences of violating the Code of Conduct?**

For BPTP International Trade Centre Limited

Authorised Signatory



Violation of the Code of Conduct is a material breach of the terms of employment. This would lead to serious consequences such as disciplinary action including but not limited to termination of services and civil/criminal action in certain cases.

1.4. What does this mean for me?

We expect you to:

- Behave in an ethical manner, taking pride in your actions and decisions;
- Comply with the principles and rules in our Code of Conduct and fulfill your legal and regulatory obligations; and
- Understand the BPTP Way and apply our Business Principles to your work.

1.5. If you are in a managerial role, you have an important role in ensuring our Code of Conduct is understood and applied by your team. In particular, we expect you to:

- Be a role model for Working in The BPTP Way;
- Ensure your team members are familiar with our Code and that they understand it; and
- Hold your team members accountable for complying with our Code.

2. CODE OF CONDUCT AT WORK


2.1. Company Personnel are accountable for their actions and for conducting all business with honesty and integrity. Therefore, every employee should follow all company policies governing day-to-day performance of jobs, including the standards set forth for business conduct in the workplace.

2.2. Company Personnel shall maintain objectivity and avoid all conflicts of interest in performing their duties and responsibilities towards BPTP. The conflicts of interest shall inter alia include:

2.2.1. Any interest (financial or otherwise) with any third party with whom the Company has business dealings with;

2.2.2. Any participation in a joint venture or partnership firm (either directly or through immediate family members) with any consultant, contractor, service provider, channel partner or vendor of the Company;

For BPTP International Trade Centre Limited


Authorised Signatory



culture}movement

- 2.2.3. Any such conflict of interest (whether prior or present) shall be immediately disclosed in writing to the HR department of the Company.
- 2.3. Company personnel shall not use corporate opportunities discovered through use of proprietary information or position in BPTP for personal gains or to compete with BPTP.
- 2.4. Company Personnel shall deal fairly with customers, suppliers, competitors and other employees of BPTP.
- 2.5. Company Personnel shall not discriminate against any employee on basis of race, ethnicity, gender, creed, religion, age or disability.
- 2.6. Company Personnel shall neither tolerate nor encourage harassment, including sexual harassment, in any form. Any such incident shall be immediately reported to the HR department.
- 2.7. Employees will give the true, correct, complete and full disclosure about any of Employee's family members (including spouse, children, parents, siblings) or near relative being employed with any of the competitor of the Company or consultant/contractor/service provider/channel partner/vendor of the Company, where by virtue of such employment or engagement of the family members or near relative of the Employee, there can be a conflict of interest between the Company where the Employee is engaged and that of the Company's competitors or consultant/contractor/service provider/channel partner/vendor where such family member or relative of the Employee is engaged. Further employee is also required to disclose about his / her personal relationship with other employee(s) of the Company, to the HR department, where any such relationship may or potentially result in any conflict of interest at work place.
- 2.8. Company Personnel shall not make any political contributions as a representative of the BPTP.
- 2.9. Company Personnel shall be responsible for providing honest, accurate information in the course of their work with BPTP.
- 2.10. Company Personnel shall not knowingly make any misrepresentations regarding the financial statements of the Company or a member of BPTP or any facts in the preparation of the Financial Statements.
- 2.11. Company Personnel will not form, create, raise, be part of or join (part time or full time) any union or other similar organization against the Company or otherwise.
- 2.12. Company Personnel will not use Company facilities or resources, or time for outside business / personal activities.

For BPTP International Trade Centre Limited


Authorised Signatory



culture}movement

- 2.13. Company Personnel shall comply with all applicable laws, standards, principles, guidelines, rules and regulations of the Company in the preparation of the Financial Statements.
- 2.14. Company Personnel shall be candid in all dealings with the external as well as internal auditors.
- 2.15. Company Personnel must not accept any form of bribe from any of the Company's consultant/contractor/service provider/channel partner/vendor.
- 2.16. Company Personnel must not disclose any confidential information of the Company, its customers, suppliers, business partners, company personnel or stockholders, except when such disclosure is authorized by the Company or is legally mandated.
- 2.17. All Company personnel are responsible for reporting any act of violation of the code of conduct. If an employee witnesses an act that is unsafe, unethical or unprofessional and could in anyway, jeopardize the integrity, reputation or safety of the Company, it is his/her responsibility to report the same.
- 2.18. Failure to comply with the Code of Conduct Policy shall constitute a material breach of conditions of employment and may result in disciplinary action up to and including termination and in some circumstances civil/criminal charges. These consequences apply not only to employees who violates the Code of Conduct Policy but to those who condone misconduct.

3. INFORMATION TECHNOLOGY RELATED CODE OF CONDUCT

Company personnel will ensure that the facility of Computer Systems, Network and Internet Access provided by the Company will not be misused / abused. Misuse and/or abuse of the above includes but is not limited to:

- 3.1. Using privileged/Company information such as customer database, employee database, financial statements etc. for personal gain or sending it to those outside the company.
- 3.2. Visiting obscene / sites and downloading such information and circulation of the same.
- 3.3. Downloading and / or installation of any unauthorized software or anything that could cause offense or infringe data-protection or copyright law.
- 3.4. Accessing, downloading and viewing inappropriate sites / information.
- 3.5. Tampering with Computer Source Codes, Computer Software, Computer Hardware, etc. belonging to the Company, or its employee(s) or its customers.
- 3.6. Hacking into any other Computer, Computer System, Network, and unauthorized access of any Computer, Computer System, Network, and


For BPTP International Trade Centre Limited

Authorized Signatory Page

- 3.7. Uploading any information pertaining to the Company, without prior written consent / approval from the Company.
- 3.8. Any other acts as contained under the Information Technology Act, 2000 (Cyber Laws) qualifying as Cyber Crimes.
- 3.9. Not abiding by the Rules and Regulations as laid down from time to time, in the Privacy Policy and Security Policy of the Company.
- 3.10. Accessing other employee's email account without prior written permission.

4. MISCONDUCT AT WORK

- 4.1. To help clarify the Company's position and to avoid misunderstanding, all employees are required to note that certain activities, as listed below, are not acceptable and commission or omission of any act shall constitute misconduct.
- 4.2. Work performance, which is not up to the standard set by the Company and for which the employee has been employed.
- 4.3. Breach of the Non-disclosure and Non-Compete agreement signed between each employee and
- 4.4. Unauthorized possession and/or improper accounting, duplication, multiplication and /or sale of Company material.
- 4.5. Disclosure of confidential or classified information to unauthorized persons.
- 4.6. Deliberate misrepresentation in order to obtain employment.
- 4.7. Falsification of personal records, production reports, time sheets, travel statements, expense statements, records or logs.
- 4.8. Habitual late coming or going earlier than stipulated time without approval and unauthorized absence.
- 4.9. Not reporting for work without information for more than 3 days at a stretch.
- 4.10. Possession or consumption of liquor or narcotics in the Company premises, or reporting to work under influence of either.
- 4.11. Willful destruction of the Company's or its employee's property or any acts of sabotage.
- 4.12. Unauthorized removal of Company's or its employee's property.
- 4.13. Disorderly or indecent conduct, while on duty towards customers, suppliers, co-workers and the general public. Such Disorderly or indecent behavior includes but is not limited to:

For BPTP International Trade Centre Limited

Authorised Signatory

- Repeated, offensive flirtation or advances
 - Offensive jokes for teasing
 - Offensive physical conduct
 - Use of abusive language
- 4.14. Failure or refusal to carry out any lawful and reasonable instruction of superiors or deviation from standard operating procedures.
- 4.15. Inciting others to commit breach of law and/or Company's rules and regulations.
- 4.16. Conviction by a court of law for any crime.
- 4.17. Misrepresentation of health status for absence.
- 4.18. Possession or carrying of or use of firearms or any type of weapon on Company premises.
- 4.19. Any other acts of similar nature.
- 4.20. Abuse of authority at any defined level in the Company.
- 4.21. Any violation of applicable law and regulations applicable to the Company, thereby exposing the Company to prosecution, penalties or fines;
- 4.22. Any instance of misappropriation of Company's assets;
- 4.23. Activity violating any laid down Company Policy, including the Code of Conduct; and
- 4.24. Any other activities whether unethical or improper in nature and adverse to the interests of the Company.

5. DISCIPLINARY ACTIONS FOR BREACH OF CODE OF CONDUCT

- 5.1. If it is observed / reported that an employee has failed to follow or has violated any Rules and Regulations of the Company including those stipulated under this Policy, Company reserves the sole discretion to take necessary disciplinary action against the concerned employee.
- 5.2. Such disciplinary actions would include but not be limited to the following:
- 5.2.1. Extension of Training / Probationary period;
 - 5.2.2. Suspension without salary;
 - 5.2.3. Stoppage or deferment of any increment in the salary of the employee with or without cumulative effect;

For BPTP International Trade Centre Limited
Authorised Signatory

- 5.2.4. Demotion to a lower grade / scale / position;
- 5.2.5. Recovery, from the salary of the employee, the whole or part of the monetary loss caused to the Company by the negligence of such employee;
- 5.2.6. Combination of the above punishments;
- 5.2.7. Discharge from services without notice or payment in lieu thereof; and
- 5.2.8. Termination without notice.

6. PROCEDURE TO REPORT UNETHICAL PRACTICES - FOR EMPLOYEES

- 6.1. All company personnel are responsible for reporting any act of violation of the code of conduct. If an employee witnesses an act that is unsafe, unethical or unprofessional and could in anyway, jeopardize the integrity, reputation or safety of the company, it is his/her responsibility to report the same.
- 6.2. Breach of Code of Conduct can be reported to hrdepartment@bptp.com

7. PROCEDURE TO REPORT UNETHICAL PRACTICES - FOR SUPPLIERS

- 7.1. All supplier issues are governed as per the work order/SLAs.
- 7.2. Any breach can be reported to the concerned HOD's on the appointed date or to hrdepartment@bptp.com
- 7.3. Suppliers need to leave a call back number and use "reporting breach of code of conduct" in the subject line.

For BPTP International Trade Centre Limited

For BPTP International Trade Centre Limited

Authorised Signatory

Authorised Signatory