

Steelman Telecom Limited

(Formerly known as Steelman Telecom Private Limited)

Code of Business Ethics Policy

1. Brief and Purpose

This Code of Business Ethics outlines the ethical principles and standards that guide our business conduct. It is intended to foster a culture of integrity, honesty, and fairness. We, as Employees, Non-Employees, Contractors, or any third party associated with Steelman Telecom Limited, pledge to abide by the importance of this policy and adhere to its core principles and purpose. We are committed to maintaining the highest standards of ethical conduct in all our interactions.

2. Core Values & Principles:

- Integrity: Honesty, truthfulness, and fairness in all business dealings.
- Respect: Treating all individuals with dignity and respect, regardless of their position or background.
- Responsibility: Accepting accountability for one's actions and decisions.
- Fairness: Treating all parties fairly and equitably.
- Transparency: Open and honest communication with all stakeholders.

3. Ethical Conduct

- Compliance with Laws and Regulations: We comply with all applicable laws, regulations, and industry standards.
- Fair Competition: We engage in fair competition and avoid anti-competitive practices.
- Customer Focus: We prioritize customer satisfaction and act in their best interests.
- Confidentiality: We protect confidential information and trade secrets.
- Environmental Responsibility: We minimize our environmental impact and promote sustainable practices.
- Social Responsibility: We contribute positively to the communities in which we operate.
- Conflict of Interest: Avoiding situations that may compromise professional judgment or create a conflict between personal and professional interests.
- Bribery and Corruption: Prohibiting bribery, kickbacks, and other forms of corruption.
- Fraud and Misrepresentation: Preventing fraudulent activities and ensuring accurate and truthful information.
- Intellectual Property: Respecting intellectual property rights and avoiding plagiarism or unauthorized use of confidential information.

4. Customer Relations:

- Customer Service: Providing excellent customer service and addressing customer concerns promptly and fairly.



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- Product Quality: Ensuring the quality and safety of products and services.
- Fair Pricing: Setting fair and competitive prices for products and services.
- Truthful Advertising: Avoiding false or misleading advertising.

5. Employee Relations:

- Fair Treatment: Treating all employees fairly and equitably.
- Equal Opportunity: Providing equal opportunities for all employees, regardless of race, gender, age, religion, or other protected characteristics.
- Workplace Safety: Prioritizing employee safety and well-being.
- Harassment and Discrimination: Preventing harassment and discrimination in the workplace.
- Whistleblower Protection: Encouraging employees to report unethical behavior without fear of retaliation and ensuring protection against any adverse action for reporting in good faith.

6. Supplier Relations:

- Fair Dealing: Treating suppliers fairly and ethically.
- Ethical Sourcing: Ensuring that suppliers adhere to ethical and sustainable practices.

7. At Steelman Telecom Limited, we want to establish a clear Code of Business Ethics, so that our organizations can:

- Enhance Reputation: Build a strong reputation for ethical conduct and social responsibility.
- Attract and Retain Talent: Attract top talent who share the organization's values and create a positive work environment.
- Mitigate Risk: Reduce the risk of legal and reputational damage.
- Improve Decision-Making: Provide a framework for ethical decision-making.
- Foster a Positive Culture: Promote a culture of integrity, honesty, and fairness.

8. Reporting Ethical Violations

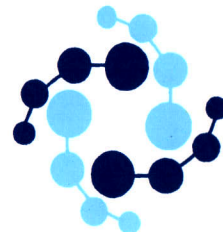
We encourage employees to report any suspected violations of this Code of Business Ethics. A confidential reporting mechanism is available to employees to report concerns without fear of retaliation.

Reporting: Employees are encouraged to report any suspected violations of this policy to their supervisor, HR, or the appropriate ethics hotline at compliance@steelmantelecom.com. Reports may be made anonymously if preferred, and all reports will be investigated promptly.



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9. Training and Awareness

We will provide regular training and education to all employees to ensure they understand and adhere to this Code of Business Ethics.

10. Enforcement

- Violations of this Code of Business Ethics may result in disciplinary action, up to and including termination of employment.
- By adhering to this Code of Business Ethics, we can maintain our reputation for integrity and ethical conduct.

11. Review and Update:

This policy will be reviewed and updated periodically to ensure its continued effectiveness and compliance with applicable laws and regulations.

By The Order of the Board
For Steelman Telecom Limited

Steelman Telecom Limited

Mahendra Bindal Director
(Managing Director)

DIN: 00484964