

Steelman Telecom Limited

(Formerly known as Steelman Telecom Private Limited)

Code of Conduct for All Employees

1. Background

To succeed requires the highest standards of behavior from all of us. The purpose of Code of Conduct & Ethics (the "Code") is to conduct the business of the Company and its subsidiaries by the applicable laws, regulations, rules and with the highest standard of ethics and values. The matters covered in this Code are of utmost importance to the employees and other stakeholders of the Company.

2. Applicability

All the employees of **Steelman Telecom Limited** (Full-timers, Consultants, Part-Timers, Interns etc.) Every employee shall be duty-bound to follow the provisions of the Company Code in letter and spirit. Any instance of non-compliance of any of the provisions shall be a breach of ethical conduct and shall be viewed seriously by the Company.

Accordingly, the employees are expected to read and understand the Code and uphold these standards in their business dealings and activities.

Provision has been made for employees to be able to report in confidence and make any protected disclosure under the Company's Whistle Blower Policy arising out of unethical behavior, actual or suspected, fraud or violation of the company's Code of Conduct and Ethics policy.

3. Core Values and Principles:

3.1 Values - Towards the Customer-Centric

- **Reliability:** Ensuring consistent and reliable service delivery.
- **Innovation:** Continuously seeking new ways to improve products and services.
- **Accessibility:** Making technology accessible to all.
- **Responsiveness:** Providing timely and effective customer support.

3.2 - Values - Towards Employee's Focus

- **Collaboration:** Fostering teamwork and knowledge sharing.
- **Development:** Investing in employee growth and training.
- **Diversity and Inclusion:** Promoting a workplace that values different perspectives.
- **Integrity:** Upholding ethical standards and transparency.

4. Company's Mission, Vision & Aim:

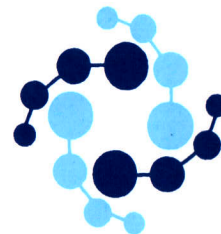
4.1 Mission: To connect people, empower communities, and drive innovation through reliable, accessible, and affordable telecommunications solutions.

- **Connect people:** This emphasizes the core purpose of a telecom company: facilitating communication and connection between individuals.
- **Empower communities:** This highlights the broader impact of telecommunications in enabling economic growth, education, and social development.



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- Drive innovation: This underscores the company's commitment to technological advancement and its role in shaping the future of communications.
- Reliable, accessible, and affordable solutions: This specifies the key attributes of the services offered: reliability, accessibility to a wide range of customers, and affordability.

4.2 Vision: To be the leading provider of telecommunications services, recognized for our commitment to customer satisfaction, technological advancement, and social responsibility.

- Leading provider: This sets the company's aspiration to be the top choice in the telecommunications industry.
- Customer satisfaction: This emphasizes the importance of prioritizing customer needs and experiences.
- Technological advancement: This reinforces the commitment to innovation and staying ahead of industry trends.
- Social responsibility: This indicates the company's desire to contribute positively to society and the environment.

4.3 Aim: Our Aim is to abide to it's mission and vision, So that we can guide our strategic direction, align its operations, and inspire our employees to work towards a common goal.

5. Ethical principles: Outline the ethical standards expected of employees, such as honesty, integrity, and fairness.

Steelman Telecom Limited, as service provider of essential communication services, have a significant responsibility to uphold ethical standards. Here are some key principles that our employees should adhere to:

5.1 Customer Privacy and Data Protection

- Confidentiality: Ensure the confidentiality of customer data, including personal information, call records, and internet usage.
- Consent: Obtain explicit consent from customers before collecting or using their data for any purpose, except as required by law.
- Data Security: Implement robust security measures to protect customer data from unauthorized access, breaches, and misuse.
- Transparency: Be transparent with customers about how their data is collected, used, and shared, and provide them with clear options for managing their privacy settings.

5.2 Fair Business Practices

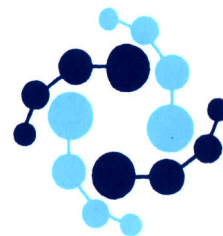
- Honesty and Integrity: Conduct business honestly and ethically, avoiding deceptive practices or misleading information.
- Transparency: Disclose all relevant information to customers, terms and conditions, and any potential limitations or restrictions.
- Fair Competition: Engage in fair competition and avoid anti-competitive practices that harm consumers or other businesses.



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5.3 Environmental Responsibility

- Sustainability: Promote sustainable practices in operations, reducing energy consumption, minimizing waste, and conserving resources.
- Compliance: Adhere to environmental regulations and standards, and strive to exceed industry best practices.
- Ethical Sourcing: Ensure that materials and components used in telecom products and services are sourced ethically and responsibly.

5.4 Workplace Ethics

- Respect and Dignity: Treat all colleagues with respect and dignity, regardless of their position, background, or beliefs.
- Fairness and Equity: Ensure fair treatment and equal opportunities for all employees, avoiding discrimination or harassment.
- Integrity and Honesty: Maintain high standards of integrity and honesty in all workplace interactions.
- Conflict of Interest: Avoid conflicts of interest and disclose any potential conflicts to your supervisor.

5.5 Compliance with Laws and Regulations

- Adherence: Comply with all relevant laws and regulations, including those related to privacy, data protection, consumer protection, and telecommunications.
- Awareness: Stay informed about changes in laws and regulations and ensure that you are updated on any kind rules set for compliance requirements.
- **Periodic Training:** Employees are required to undergo periodic training to stay informed on evolving laws and regulations, including new compliance requirements, data privacy regulations, and industry-specific guidelines.

6. Legal Compliances:

6.1 Anti-discrimination: To establish a workplace environment free from discrimination and harassment, promoting equality, fairness, and respect for all employees.

Scope: This policy applies to all employees, regardless of their position, tenure, or location within the company.

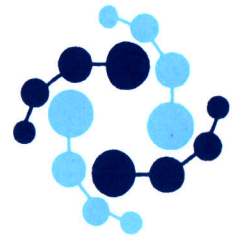
Prohibited Conduct: Discrimination or harassment on the basis of any protected characteristic, including but not limited to:

- Race: Includes color, ethnicity, or national origin.
- Religion: Includes religious beliefs or practices.
- Gender: Includes gender identity, gender expression, and sexual orientation.
- Age: Includes age discrimination.
- Disability: Includes physical or mental disabilities.
- Marital status: Includes whether or not an employee is married, divorced, or widowed.
- Pregnancy: Includes pregnancy, childbirth, and related medical conditions.



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- Genetic information: Includes genetic testing or information.
- Veteran status: Includes Ex-Armed Forces.

Examples of prohibited conduct:

- Harassment: Includes unwelcome verbal, written, or physical conduct that creates a hostile work environment.
- Retaliation: Includes adverse actions taken against an employee for reporting or opposing discrimination or harassment.
- Disparate treatment: Includes treating employees differently based on a protected characteristic.
- Disparate impact: Includes policies or practices that have a disproportionate negative impact on employees of a protected class.

Complaint Procedure:

- Reporting: Employees who believe they have experienced discrimination or harassment should report the incident to their supervisor, human resources department, or Legal & Compliance Dept at legal@steelmantelecom.com and compliance@steelmantelecom.com
- Investigation: The company will promptly investigate all complaints in a confidential manner.
- Whistleblower Protection: Employees reporting incidents in good faith are protected against any form of retaliation. An anonymous reporting system is available to ensure confidentiality.
- Remediation: If the investigation determines that discrimination or harassment has occurred, the company will take appropriate corrective action, which may include disciplinary measures up to and including termination of employment.

6.2 Prevention and Training:

- Training: The company will provide regular training to all employees on anti-discrimination and harassment policies, including the definition of prohibited conduct, the complaint procedure, and the consequences of violating the policy.
- Prevention: The company will implement measures to prevent discrimination and harassment, such as creating a culture of respect and inclusivity, establishing clear communication channels, and monitoring the workplace for signs of discrimination or harassment.

7. **Harassment:** This policy aims to create a safe and respectful workplace environment free from all forms of harassment, including sexual harassment. It outlines the company's commitment to preventing and addressing harassment promptly and effectively.

Scope: This policy applies to all employees, contractors, interns, and other individuals working on behalf of the company.

7.1 Definitions: Any unwelcome conduct that creates a hostile, intimidating, or offensive work environment. This includes but is not limited to:

- Sexual harassment: Any unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature.



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- Verbal harassment: Insults, threats, or other offensive language based on protected characteristics.
- Physical harassment: Physical contact, intimidation, or threats of physical harm.
- Electronic harassment: Harassment through email, text messages, social media, or other electronic means.

7.2 Protected characteristics: Race, colour, religion, sex, national origin, age, disability, genetic information, marital status, pregnancy, sexual orientation, gender identity, or veteran status.

7.3 Prohibited Conduct:

- Any form of harassment as defined above.
- Retaliation against anyone who reports harassment or participates in an investigation.
- Creating a hostile work environment.

7.4 Reporting Procedure:

- Informal Resolution: Employees who believe they have been harassed should first attempt to resolve the issue informally by speaking directly to the harasser or a supervisor.
- Formal Complaint: If informal resolution is unsuccessful, employees may file a formal complaint with the Human Resources department or a designated compliance officer.
- Investigation: All complaints will be promptly investigated by a designated investigator. The investigator will interview the complainant, the alleged harasser, and any witnesses.
- Confidentiality: The company will maintain confidentiality to the extent possible throughout the investigation process.

7.5 Disciplinary Action: The company will take appropriate disciplinary action against any employee found to have engaged in harassment. Disciplinary action may include, but is not limited to, verbal or written warnings, suspension, or termination of employment.

7.6 Prevention and Training:

- Training: The company will provide regular training to all employees on harassment prevention and the company's harassment policy.

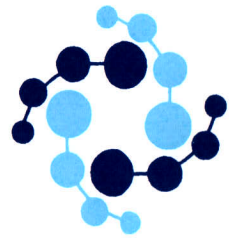
7.7 Prevention Measures: The company will implement measures to prevent harassment, such as:

- Clear communication of the company's commitment to a harassment-free workplace.
- Establishment of a complaint procedure.
- Prompt investigation and resolution of complaints.
- Implementation of disciplinary measures for violators.
- Creation of a safe and supportive work environment.



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8. Professional Conduct

- Respectful behaviour: employees are required to treat each other and customers with respect and courtesy.
- Confidentiality: Outline obligations for maintaining confidentiality of company information.
- Time management: Address punctuality, attendance, and time off policies.
- Conflict resolution: Provide guidelines for resolving disputes and conflicts in a professional manner.

9. Technology and Social Media

- Company property: Specify rules for using company devices and technology.
- Social media: Outline guidelines for using social media while representing the company.
- Data privacy: Address data protection and privacy requirements. This is also applies while handling customer data.

10. Employee's Commitment towards the Company: Employees are expected to work to exceed the following code of ethics and principles. They should seek the commitment of their supervisor/manager in implementing the code and should seek to achieve widespread acceptance of the code amongst fellow employees. Employees should raise any matter of concern of an ethical nature with their immediate supervisor/manager or another senior colleague, irrespective of whether it is explicitly mentioned in the code.

10.1 Employees should act professionally by:

- Conducting all their dealings/ interactions in a manner that will protect and enhance Steelman Telecom Limited's name and reputation at all times.
- Seeking to uphold and enhance the standing of the profession within and outside the organisation.
- Maintaining the highest possible standards of integrity in their internal & external business relationships.
- Rejecting any business practice that may be deemed improper (i.e. not in line with the Company Code of Ethics or in contravention of any other local policies or laws).
- Never using their authority for personal gain for themselves or their immediate family or friends.
- Encouraging/Developing the highest possible professional competence amongst those who they are responsible for.
- Enhancing the stature and effectiveness of the organization by acquiring and I am maintaining high levels of professional skills.
- Using the resources, they are responsible for to provide the maximum benefit to Company.
- Complying with both the local legal regulations (letter and spirit) of the place where they operate.
- Complying with contractual obligations.

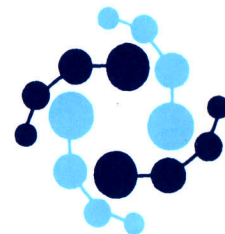
10.2 Guidelines: In applying these principles, employees should follow the guidelines below:

10.2.1 Personal Interest: Employees must avoid situations in which their private interests, conflict or might reasonably be thought to conflict with, their Company duties. Any personal interest that may affect or be seen by others to affect their impartiality should be declared to their immediate supervisor and Head of the Department who will direct that employee not to perform that duty.



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10.2.2 Confidentiality: Confidentiality of all information received from the client etc be respected and should never be used for personal gain. Any information given should be in a clear & honest way that is not deliberately misleading. Company information on strategic plans, business models, investment decisions, database, etc should not be given to third parties. Confidential information received from clients on strategic plans, investment decisions, expansion plans, product pricing, etc should not be given to other clients.

10.2.3 Competition: Grant all competitive clients equal consideration in so far as company policy permits. The nature and length of contracts & business relationships with clients can vary according to circumstances. These should always be constructed to ensure deliverables and benefits for Company. Arrangements that might in the long term prevent effective operation of fair competition should be avoided.

10.2.4 Business Gifts: Employees must not solicit or accept from any person any remuneration, benefit, advantage or promise of further advantage whether for themselves, their immediate family, or any business concern or trust with which they are associated.

Business gifts, other than items of a very small intrinsic value (not more than the cost of a normal business lunch) such as diaries, pens, calendars, etc should not be accepted.

Any gifts should be able to be used at the normal place of work of the employee concerned and should contain the name/logo of the company providing the gift.

10.2.5 Hospitality: An employee should not allow him or herself to be influenced or be perceived by others to be influenced as the result of hospitality. The frequency and scale of hospitality should be managed openly and with care. The value of any hospitality should not be greater than the employee's company can reciprocate.

10.2.6 Meetings & client visits/audits: All meetings and significant telephone conversations with clients should be documented and circulated via the established communication channels (e-mail, documents, etc).

10.2.7 Transparency/Traceability: All salient points concerning a business decision must be recorded in a document that is kept on file as per company policy. In particular, this document should contain the technical and financial factors that influenced the choice, as well as the opinions and authorizations that preceded it, under the procedures in force at the time the decision was made.

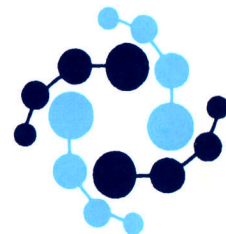
11. Decisions & Advice: When it is not easy to decide what is and is not acceptable, advice should be sought from the employee's supervisor/manager, the Head of Department or Compliance Team at compliance@steelmantelecom.com

This code of ethics has been written for the employees, but should be cascaded to and should be followed by all company personnel in contact with employees.



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11.1 Enforcement: The company will strictly enforce this policy and take appropriate disciplinary action against any employee found to have violated its terms.

11.2 Review and Updates: This policy will be reviewed 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

Director

Mahendra Bindal
(Managing Director)
DIN: 00484964