

Code of Conduct for Responsible Business Practices at ITNL

The extracts of the various policies & processes compiled as BRR Code of Conduct of the Company is as follows:

1. Ethics, Transparency and Accountability

- A. In carrying out the business of the Company or in any matter involving the Company, no employee shall resort to bribing or offering any monetary benefit or in any way offering any favour other than in the normal course of business, to any official, government, regulatory or otherwise. No employee shall accept, seek, and solicit, for his personal benefit, any gifts or presents in cash of significant monetary value, for the professional services rendered or business deal done on behalf of the Company, from existing and or prospective constituents

B. Third Party Intellectual Rights:

In the course of performance of their official duties, employees will use or have access to Software, Databases and other materials in which third parties have copyright or other proprietary interest. These third party intellectual property rights shall be honored by the employees and the said materials shall not be copied (includes loading software or other material onto the hard drive of a computer, copying it on to a disk and any other transmission of material e.g., sending via e-mail) without obtaining the prior permission of the copyright owner

2. Provide goods and services that are safe and contribute to sustainability throughout their life cycle.

The Company is engaged in developing surface transportation networks. The roads, bridges, tunnels to be built by the Company shall comply with all the applicable engineering standards and codal provisions of Indian Road Congress. Bureau of Indian Standards and good engineering practices are adopted by the design team to ensure that the road user has safe and enjoyable ride on our roads

3. Wellbeing of employees

The Company provides various facilities for the wellbeing of the employees. These facilities are included in the Employees Handbook which is available to all employees. In addition, the Company provides additional facilities to women employees such as car drop facility for those working late hours and a Crèche Facility.

The Company also has covered all employees their parents and dependent children under Group Medical Insurance policy

4. Respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

The Company recognizes its stakeholders as the following: employees, customers and clients, shareholders, suppliers and contractors, business partners and the community. The company shall strive to safeguard the interests of all its stakeholders, particularly the minority and vulnerable stakeholder groups such as the on-site labourers and the community in project catchment areas. The Company is committed to transparent disclosure of and access to information that impacts relevant stakeholder groups including community awareness generation pertaining to safety with respect to relevant business activities of the Group. The Company shall endeavor to balance any conflicting interests of its stakeholders. The Company shall strive to promote ethical conduct across the value chain of its business operations

Each stakeholder group has relevant grievances redressal mechanism available for registering their complaints and seek resolution

5. Respect and promote human rights

The Company strives to provide a safe, healthy, clean and ergonomic working environment for all employees. We do not employ child labour or forced labour in any form at any of our locations. There is no discrimination among employees on the basis of cast, creed, religion, gender, faith or sexual preferences

6. Respect, protect, and make efforts to restore the environment

Staff, in their business activities, should endeavor to adhere to the following environmental aspects to the extent feasible:

- Resource conservation
- Sustainable consumption
- Responsible use of resources
- Minimal impact on the natural environment

Staff should follow the operational aspects of the Environmental and Social Policy Framework (ESPF) while managing environmental and social risks posed by our activities

7. Dealing with public and regulatory policy

ITNL employees shall follows public advocacy policy of IL&FS Limited (parent company) as available on https://www.ilfsindia.com/media/1864/general_policies.pdf

Staff shall endeavor to produce full, fair, accurate, timely and understandable disclosures in reports and documents that Company files with or submits to the regulators and in other public communications made by the Company.

8. Support inclusive growth and equitable development

Through various CSR activities Company undertakes various projects & rehabilitation programs for inclusive growth of people in the catchment areas of our projects

9. Provide value to their customers and consumers in a responsible manner

In order to provide value to the customers (road users), the Company provides special focus to the road safety. In order to review road safety performance from time to time, the Company has set up EHS committee of the Board of Directors comprising of three independent directors.

On advice from the EHS committee, initiatives for behavioral safety and innovative signage, first respondent system for providing first aid to the accident victims in the golden moments, etc. have been rolled out at several projects of the Company

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Sd/-
Mukund Sapre
Executive Director