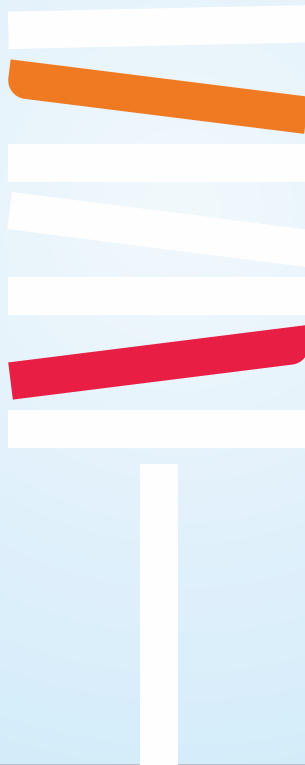




Code of Conduct



Vision



Be the trusted performance leader by
unleashing the potential of
bitumen derivatives and contribute to
sustainable infrastructure development.



About the Code of Conduct

ITPL Code of Conduct is a reference document created for employees to help them understand the Guiding Principles and familiarize everyone with their individual responsibilities.

It provides guidance and support for every ITPL employee to demonstrate high standards of ethical behaviour and ensure that the organization is compliant with local laws and regulations which are essential to protect the reputation and long-term success of the business.

It also defines our commitment towards our internal and external stakeholders.



Our Commitment towards the code

The Code of conduct is for everybody working for or on behalf of the Company. We expect everyone who represents the Company to uphold the same standards and abide by our Code and its policies.



What does this mean for us?

ITPL expects us to:

**To behave ethically and take pride
in our actions and decisions.**

**To comply with the rules to
fulfill our legal and regulatory
obligations.**

**To seek guidance wherever required
if we feel a working practice is
not ethical or safe.**

**To report non-compliance or
breach of our code immediately.**

The Guiding Principles

SPIRIT



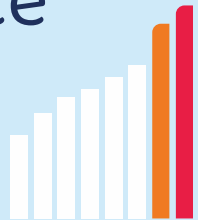
safety



Safety is our key principle. We are uncompromising in our commitment to the safety of our employees, customers, suppliers, and community. We continuously improve our processes and promote comprehensive safety measures. As individual accountability, we expect all employees to adhere to our safety standards, and actively participate in and support the advancement of our safety practices.

performance

We work relentlessly to obtain the highest quality results through continuous improvement. It is our commitment to deliver the best to our customers and all stakeholders.

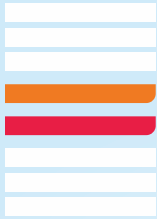


integrity



We believe that integrity is a foundation on which strong and long-lasting relationships are built. We acknowledge that the integrity of our personal and business interactions affects our employees, customers, partners, and community and defines our reputation. We are fully committed to our strong integrity culture and ensure that we do everything in a moral, ethical and transparent manner.

respect



Respect at ITPL means that every person is of equal value. We embrace diversity to create teams that make us stronger & efficient to add value to our business. We respect and follow human rights laws and abide by local rules and regulations set by the varied governing authorities. We are committed to promote empathy, cooperation, collaboration, tolerance and encourage free expression of opinions and ideas. We remain attentive to listen and respect our customers, community, and environment.

innovation

We believe that it is extremely important to create and maximize value through innovation to achieve our growth ambitions. We strive for better solutions to improve our products, services & processes. We endeavor to promote creativity in our everyday workings.



trust



We believe that trust is a core to any relationship that we build internally and externally. We strive to build trust in every action by professionally conducting ourselves to build long-lasting trustworthy relationships with all our stakeholders.

Our Responsibilities

Zero Tolerance

To have long-term success we strive to align ourselves with the needs of society and abide by all laws and regulations. We do this without compromising on our ethics and business standards. We maintain a policy of zero tolerance for any type of fraud or any kind of bribery & corruption or any violation of antitrust/competition law. We seek to maintain integrity in our business relationships while dealing with all stakeholders.

For more details, refer Rules of Individual Behavior in Employee Manual.

Whistleblowing

Whistleblowing is an act to report suspected wrongdoing at work by an employee or by the Company or by any internal or external stakeholder. Our whistleblowing policy exists to help us to speak up in situations where we suspect dangerous, illegal, harmful or any fraudulent activity is taking place.

ITPL conducts its business to the highest standards of integrity and honesty, and we expect everyone to maintain these same standards in everything we do.

To determine the right thing to do in any situation, think:

Is it legal?

Does it comply with
ITPL's policy?

Is it ethical?

If the answer to any of these is 'no' then we expect you to speak up.

Who should I speak to?



If you have an issue with a colleague or business partner, you should initially discuss the matter with them. If this is not possible, you should speak to or get in touch with the Ethics Officer. For more details, refer Whistleblower Policy.



Harassment-Free

Environment & Workplace safety

Every employee has the right to a working environment that is free from harassment and intimidation. We are very sensitive to cultural and social differences and have a zero-tolerance approach towards any harassment and intimidation.

Our effort is to ensure the complete workplace safety of our employees. We expect all our employees to play their part to make ITPL safe and secure and ensure that they have the right equipment, training and knowledge of their job which guarantees a safe working environment. To do so, we must all be aware of safety issues and policies that affect our jobs. Whenever there is a workplace injury or a dangerous situation, it is very important for us to immediately alert our manager or the person responsible for health and safety at our location.

Acting promptly on such issues allows our company to conduct a timely investigation and take any appropriate action to resolve them.

For more details, refer Employee Manual.



Antibribery and corruption

ITPL believes in doing business with integrity. This means we never offer bribes or kickbacks of any kind to any individual or entity, regardless of who our contact is. We operate with a zero-tolerance policy towards bribery and corruption. We do not offer or accept bribes or improper inducements, to secure business or to gain any advantage either for the company or for the individual. We expect you to combat all forms of corruption and take all reasonable steps to ensure that everyone you work with does the same.

For more details, refer Rules of Individual Behaviour in Employee Manual.



Fair Practices towards Vendors & Customers

We choose our vendors based on competitive price, quality, delivery, service, reputation, and business practices. We treat our vendors and subcontractors with fairness and integrity. We respect the terms and conditions of our agreements and honour our commitments.

We continuously seek to satisfy our customers with high quality standards. We must treat our customers with all applicable laws and earn our business on the basis of superior products, customer service and competitive pricing. We will not enter into unfair practices to win any deal or customer.

We are committed to fair competition and complies with antitrust and competition law. Fair competition provides an incentive for innovation and high-quality products for the benefit of consumers which is one of the guiding principles.



Gifts and hospitality

Maintaining high-quality professional relationships with our clients is essential for the success of our business. Sometimes we provide or receive business courtesies, such as leisure entertainment or any gift of nominal value, travel, meals or any other type of invitation. However, we never allow these courtesies to affect our ability to make objective, professional decisions or give the perception that our objectivity has been compromised.


For more details, refer Gifts and Hospitality policy in Employee Manual.



Conflicts of interest

We avoid conflicts of interest and always act in the best interest of ITPL, as an organization.

Conflicts of interest can arise in many situations, and one should always disclose the interest to the line manager and remove oneself from the decision-making process if any family member, business partner or supplier is being engaged by ITPL & where there can be a chance or possibility of Conflict of Interests. Our employment contract clearly defines individual's responsibilities and directs everyone to strictly abide by it.



Protecting our assets

Everyone in our organization is personally responsible for safeguarding, securing and protecting the Company's assets and information technology from theft, destruction, misappropriation, wastage and abuse. We must respect and look after all our assets supplies that we may have access to. We must use company resources responsibly and appropriately and ensure that all sensitive, confidential and personal information is secure and safe.

For more details, refer IT Policy.



Political relationships

In our professional role as an employee, we should not get involved in any political activity & always remain politically neutral. If one wishes to get involved in political matters outside work, we respect their right to do so but whenever this happens, they must make it clear that the views they express are their own and have nothing to do with the organization and its business operations.

Data Protection / Confidential Information

We handle the personal and confidential information about our employees, customers, clients, and all related internal and external stakeholders solely for the business purpose for which it is supplied. We have an important duty to respect this information and ensure it is secure, protected and handled responsibly.

For more details, refer IT Policy.

Communication to Outside World

Any communication with external stakeholders, such as our clients, customers or even to the media, must be clear and truthful. No employee shall communicate, as a company representative, with any member of the press or media without prior authorization by the management personnel responsible for external communication.

For more details, refer Employee Manual.

Speak up



Our Guiding Principles, Code of Conduct and its defined Policies guide our everyday actions & behaviour. We encourage a culture of openness, hence let us have a professional responsibility to speak up and report any unethical behaviour.

To report a situation of which one is aware of, that may be a violation of our Code of Conduct, talk to the line manager/Human Resource or write to the Ethics Officer.



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