

Sikka Ports & Terminals Limited

Our Code

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“OUR CODE”

1. WHAT “OUR CODE” IS ALL ABOUT

- 1.1. “Our Code” gives us the guidance and support we need to conduct our business ethically and to comply with the law.
- 1.2. “Our Code” represents our commitment to doing the right thing. By being part of SPTL you are agreeing to uphold this commitment.
- 1.3. If you do not, you could put yourself, your colleagues and SPTL at risk. Put simply, failure to follow this Code is misconduct, which could result in disciplinary action and even dismissal.
- 1.4. No part of the Code can be waived without prior approval of the Board which reflects our wholehearted commitment to it. This will be coordinated by the Ethics & Compliance Taskforce, which will obtain approvals and make sure all appropriate reports and representations are made. This includes those required by law. Waivers will only be granted in exceptional circumstances.

2. WHAT WE VALUE ?

Our Values and Behaviours are the foundation for “Our Code”. “Our Code” reflects our values i.e. Customer Value, Ownership Mind-set, Respect, Integrity, One Team and Excellence.

3. WHO MUST FOLLOW “OUR CODE” ?

- 3.1 The short answer to this is everyone. The longer answer is every employee and officer in SPTL.
- 3.2 We also seek to work with third parties who operate under principles that are similar to this Code. This includes making a contractual commitment where it is feasible to comply with the applicable laws and work in line with “Our Code”.
- 3.3 We expect all our contractors and their employees to act in a way that is consistent with “Our Code”, and follow its principles. We will consider terminating contracts where we believe they have not met our standards or their contractual obligations.
- 3.4 “Our Code” shall also apply to Non-Executive Directors including Independent Directors to such extent as may be applicable depending on their respective roles and responsibilities.

4. FOLLOWING THE LAW, SETTING THE STANDARD

It is important for you to be familiar with any legal requirements related to your roles and responsibilities. First and foremost, we must comply with legal

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requirements. Where there is a difference between a legal requirement and “Our Code”, always apply the most stringent standard.

If you have any questions about this, talk to your line manager, HR, Legal, or the Ethics & Compliance Taskforce.

5. WHAT ARE OUR GUIDING PRINCIPLES ?

5.1 **Operating safely, responsibly and reliably:**

We are committed to safety, protecting the environment and respecting the communities, in which we operate. Our health, safety, security and environment (HSSE) goals are: no accidents, no harm to people and no damage to the environment.

5.2 **Our People:**

Our people are key to our success. When we respect and value one another we succeed individually and as a Company. We all have a role in maintaining a corporate culture based on respect and fairness.

5.3 **Our Business Partners:**

We work with our business partners in an honest, respectful and responsible way. We are a Company on which others can rely. SPTL gains its competitive advantages through strong performance rather than through unethical or illegal business practices.

5.4 **The governments and communities we work with:**

We work together with governments and communities to contribute to sustainable growth, create jobs and invest in people.

5.5 **Our assets and financial integrity:**

We have a responsibility to protect shareholder value, take care of our assets and resources and to be honest and transparent about our operations and performance.

Above all, please remember that “Our Code” is only a starting point. It cannot address every situation and is no substitute for using good judgment and doing the right thing.

*For understanding in detail about above principles please refer “Code of Conduct”.

(This Code was approved by the Board of Directors at its meeting held on February 10, 2022.)