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# Code of Conduct

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## 1.0 Ethics & Values

- 1.1** MEGHA CITY GAS DISTRIBUTION PRIVATE LIMITED (MCGDPL) (the “Company”) is committed to conduct its business with integrity, belief in teamwork, respect for emerging ideas and passion for learning and innovation. We expect all of our directors and employees (“employees”), our subsidiaries, and our partners, including suppliers, subcontractors, agents, and joint venture partners (“partners”) to conduct themselves in accordance with the ethical standards of conduct we hold ourselves to.
- 1.2** The Code of Conduct contains the policies that relate to the legal and ethical standards of conduct that we expect our employees and partners to comply with while carrying out their duties and responsibilities on behalf of the Company. Compliance with these principles is a condition of employment or engagement with the Company.
- 1.3** Code of Conduct is a part of Employment Appointment Order.

## 2.0 Reporting of Illegal or Unethical Behavior

- 2.1** Employees should promote ethical Behavior and encourage other employees to talk to supervisors, managers or other appropriate personnel when in doubt about the best course of action in a particular situation. We require that any incidence of misconduct, conflict of interest, or illegal activity be reported to Ombudsman (*Refer Whistle Blower Policy Document MPD\_06\_2018-19*). All issues reported are confidential and will be treated seriously and discreetly. Employees may report anonymously should that be their preference. The Company will not allow retaliation for reports made in good faith.

### 2.1.1 Business Integrity

The Company conducts its business free from corruption or fraud and expects the same from its employees and partners. The Company and its employees do not receive or offer tangible or intangible gifts, considerations or favor in any form (*Refer Anti-Corruption Policy Document MPD\_04\_2018-19*).

### 2.1.2 Conflicts of Interest

All employees should avoid conflicts of interest between themselves and the Company.

Employees are prohibited from (a) taking for themselves personally opportunities that are discovered through the use of company property, information or position, (b) using company property, information or position for personal gain, and (c) competing with the Company.

If any employee conceives of/invent/improve on any new or advanced or current methods of improving processes/formulae/systems in relation to the operation of the Company or its affiliates or customers, such developments, discoveries or inventions will be fully communicated to the Company and remain the sole right/property of the Company.

### 2.1.3 Confidential Information

Employees should maintain the confidentiality of information entrusted to them by the Company or its customers, except when disclosure is authorized or legally mandated.

“Confidential information” includes all non-public information that might be of use to competitors, or harmful to the Company or its customers, if disclosed.

Every Employee to maintain Strict Confidence of the data/Information during the tenure of employment. Breach of this would constitute over stepping of terms of employment and Company has a right to take action against the employee, besides filing case in the court of law for receiving the damages, if any, (*refer CDA Rules for more details*).

This includes intellectual property, inventions or developments or process improvements, etc. the employee undertakes not to disclose any such information unless Company has and its authorized representative has permitted the employee to do so.

#### **2.1.4 Compliance with Laws, Rules and Regulations**

Employees should comply with the laws, rules and regulations applicable to the Company. Failure to comply with these requirements may be a criminal offence. Employees should comply with these requirements including internal policies and existing labour law codes and questions regarding compliance should be referred to appropriate personnel or outside agency as necessary.

#### **2.1.5 Protection and Proper Use of Company Assets**

Employees should protect the Company’s assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company’s profitability. All Company assets should be used for legitimate business purposes.

#### **2.1.6 Relationships with Other Parties**

Employees should endeavor to deal fairly with the Company’s customers, suppliers, competitors and employees. None should take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice (*Refer Freedom of Association Policy Document MPD\_15\_2020-21*).

#### **2.1.7 Respect for Individuals**

Employees are expected to treat all individuals with respect, tolerance, dignity and without prejudice to create a mutually respectful and positive working environment. The Company will not tolerate any form of harassment and discretion (*Refer Non-Discrimination Policy Document MPD\_14\_2019-20*).

#### **2.1.8 Harassment at workplace**

The Company is committed to provide a work environment that is free of inappropriate behavior of all kinds and harassment on account of age, physical disability, marital status, race, religion, caste, sex, sexual orientation or gender identity. Employees are responsible for supporting the Company in its endeavor to protect others from any form of such harassments and where employee is treated with dignity and respect (*Refer Non-Discrimination Policy Document MPD\_14\_2019-20*) and (*Refer Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal Policy) Document MPD\_10\_2018-19*).

#### **2.1.9 Accountability**

Employees are held accountable for Code of Conduct compliance with regard to issues within his or her control. Sanctions for a breach of this Code of Conduct shall be determined by the Board or the appropriate officer as designated by the Board. Sanctions may include serious disciplinary action, suspension from office or dismissal, or other

remedies all to the extent permitted by law and as deemed appropriate under the circumstances.

### **2.1.10 Accurate Record Keeping and Reporting**

Employees should accurately reflect the transactions of the Company in its books, records, accounts and reports and should maintain an adequate system of internal controls and disclosure controls to promote compliance with the laws, rules and regulations applicable to the Company.

### **2.1.11 Dress Code**

Since each of us is a representative of the Company, we must pay attention to personal grooming and adhere to Formal Dress Code. Employees are expected for proper hygiene and to dress neatly and in a manner consistent with the nature of work performed.

*For more details, Refer Dress Code SOP.*

### **2.1.12 Protecting the Environment**

The Company is committed to being an environmental steward by implementing the best technology available where applicable to minimize its environmental footprint and promote sustainable business best practices.

### **2.1.13 Health and Safety**

Each employee must take responsibility to become aware of the hazards associated with their workplace and tasks they are to perform. Each employee is responsible to complying with applicable safety requirements, wearing prescribed safety equipment, and preventing avoidable accidents. Each employee has a duty to report workplace conditions or practices that pose a safety hazard or threaten the environment and to take reasonable actions to alleviate such risks. Breach of safety regulations shall be deemed to be misconduct and the employee shall be liable to punishment.

### **2.1.14 Alcohol and Substance Abuse**

Employees are strictly prohibited from the use or possession of alcohol, illegal drugs, and other controlled substances in the workplace and being under the influence of these substances on the job and during working hours.

There may be company-sponsored events where management approves the serving of alcoholic beverages at the communicated venues outside workplace premises. In these events, all appropriate liquor laws must be followed, including laws regarding the prohibition of serving of alcohol to those under the legally permissible age. However, under in such events, excessive drinking, intoxication and misbehavior at these events is prohibited and will be dealt with severely.

### **2.1.15 Community Involvement**

The Company strives to cultivate a local identity in each of its host communities by employing local talent and setting good corporate citizenship standards, all while respecting local sensitivities.

The Company will regularly contribute to the economic and social development its communities, and expects all employees to promote human rights and respectful community involvement in the states/various locations in which MEGHA CITY GAS DISTRIBUTION PRIVATE LIMITED (MCGDPL) operates.

The Company reserves the right to amend or change the Code of Conduct or any service at any time without notice. We encourage you to review these guidelines periodically to ensure you are in compliance.

### 2.1.16 No exploitation of Child Labour

The Company is committed in providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

The Company strictly prohibits employment of child labour below the age of 18 years and human trafficking in all company operations.

We need to make our contracts, suppliers and others with whom we have a substantial involvement strongly aware of the standards, which we expect from them.

We shall ask for undertaking on non-involvement in child labour from our suppliers/contractors. If in doubt/as required, company will monitor their employment practices through surveys, site visits and audits. (*Refer Abolishment of Child Labour Policy\_MPD\_20\_2020-21*).

#### **Declaration : Personal Commitment to MCGDPL Values & Code of Conduct**

I acknowledge that I have read MCGDPL Values & Code of Conduct and understand my obligations as an employee. I undertake to uphold the Organizational Norms that are set forth in the Code of Conduct (including any amendments in the future).

Emp. Id		Name	
Department		Designation	
Signature:		Date	



**Venkatesh Palimpati**  
CEO and Director