



GCKC

Projects & Works Pvt Ltd



Code of Conduct

Message from the MD's Desk



Doing the things right the first time is the best way to move forward in the project and this has been our policy from inception. We strive to implement the project deliverables from concept to commissioning bringing in delight to the customer's and the stakeholders' faces. We ensure that all matters big or small are taken care from end-to-end including the post commissioning period, so that client can have uninterrupted flow of the project output, be it in any of our focused sectoral projects. Our Core values are committed to deliver exceptionally quality projects keeping the environment safe. All our EPC projects follow the standard practices of highest discipline in health and safety protocols. We strive to follow the rule book and adhere to the country's laws and regulations. We make things happen following the professional ethics, adherence to core values and no short cuts in our pursuit to excellence. We are guided by strict policies on labour engagement, create environment for ethical practices and zero tolerance towards conflicting conditions and employees are trained to work in cordial atmosphere with zero abuses and mutual understandings, which is a constant inspiration for the multi-disciplinary teams of today and tomorrow.

Ashok Kumar

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Introduction



The Code of Conduct applies to all the employees of the Company and at all offices and project sites. The Code of Conduct shall be continuously reviewed and updated to the new challenges and adapt to the new changes happening. The Code of Conduct are guided by the principles of

- Standard of excellence in all our business verticals and aspects
- Ethical and responsible conduct in our operations
- Rights and Respect of every Individual in the organisation
- Safety of our Environment and Cultural preservation of our Habitat in the project and the community.

Ethical Principles and Core Values



Our values are fundamentally seated on the guiding principles and beliefs that binds all the employees from different functions to work together as a team towards a common and larger goal of the company. We see ourselves prominently displaying the following in each and every act of our business.

- **Honesty**
Being forthright, sincere, and truthful in all our transactions and activities except where the professional responsibilities require special discretion and confidentiality.
- **Integrity**
Perform in a manner consistent with the core beliefs of the company, with the practices being in line with the guiding principles. Always adhering to the moral beliefs and act with courage and character regardless of the situational compulsions arising from political, social, and economic pressures. Upholding the concept of right and convictions to the best of the abilities.
- **Trustworthiness**

Create company's reputation of Reliability among the stakeholders in all our projects by fulfilling the promises and ensuring commitments through a fair and responsible system, while at the same exercising prudence and caution in our commitments.

- Respect for others

Interacting with others within and outside the company with courtesy and decency while at the same time acknowledging the rights of those seeking dignity and privacy.

- Responsibility

Exercising due precautions that discretionary authority is not delegated to the individuals with an intention to engage on illegality. Act with reasonable steps to prevent criminal conduct and comply to the standards and the systems. Offense detected I immediately tackled with steps to avoid recurrence.

- Accountability

All employees are answerable for their decisions and actions. All are required to comply with the terms and conditions of the employment and other written guidelines. While we think globally and work locally, we are committed to uphold the stakeholders' expectations and requirements.

- Obedience to the law

Obedying the law is the primary attribute of ethical behaviour. Obedience to the Law supersedes tendencies to comply with the superiors' wishes. All employees must follow and adhere to the letter and the spirit of laws and regulations.

- Empathy

This is an important aspect of moral behaviour and is a must while creating moral communities. Empathy in the company signifies the essence of human values and social responsibility.

- Teamwork

We create an atmosphere for fostering a network of outstanding and long-term relationships with all our stakeholders within and outside the organisation. We demonstrate teamwork by thriving in diversity and in effective interpersonal communication.

- Commitment to the code

All employees have the moral obligation to follow the codes of conduct and to ensure fair practices in the business.

Decision Making and the Code of Conduct



While providing the guidance to all the employees on ethical decision making, the practices follow the rule book of the country law and the ethics code. All employees ascertain if their actions are legal, comply with the code, reflects the company's values and binding principles without trampling the rights of others.

Reporting



The company encourages all employees to ask questions and raise issues without fear of reprisal and is committed to treating reports seriously and investigating them thoroughly. Employees must report suspected unethical, illegal, or suspicious behavior immediately. The company has zero tolerance towards retaliation against anyone who makes a good faith report of suspected misconduct or otherwise assists with an investigation or audit. Reporting a concern is done through across the table discussions with the reporting officer and escalating to the next level with the Relation Manager and Ethics Committee

Zero Retaliation



Employees reporting a good concern will not be subjected to adverse employment action including

- Unfair dismissal, demotion, or suspension
- Unfair denial of a promotion, transfer, or other employment benefit
- Exclusionary behavior
- Any other behavior that singles out the person unfairly

Equal Opportunity



We recognise the equal rights of men and women without any discrimination and maintaining the balance between personal and professional life of the employees' The company will not tolerate discrimination based on race, color, religion, gender, age, national origin, sexual orientation, part time or fixed term contract status. marital status, disability, or any other protected class.

Harassment



The Company practices the code of treating all fellow employees, customers, business partners and other stakeholders with equal dignity and respect at all times.

Any type of harassment, including physical, sexual, verbal, insulting, humiliating or other, is prohibited and can result in disciplinary action up to, and including, termination.

Harassment is seen to be done which include actions, language, written words, or objects that create an intimidating or hostile work environment.

Bullying



We are committed to ensuring that our employees, our contractors, and our customers work in safe and respectful environment that is free of bullying. Bullying includes

- spreading malicious rumor or gossip
- excluding or isolating someone socially
- establishing impossible deliverables
- withholding necessary information or purposefully giving the wrong information
- Intimidating someone
- Impeding someone's work
- Unfairly denying training, leave or promotion
- Constantly changing work guidelines
- Sending offensive jokes or emails
- Criticizing or belittling someone constantly
- Tampering with a person's personal belongings or work equipment
- Name Calling
- Harmful posting on social media
- Making someone cry
- Hitting, tripping, pushing

Conflicts of Interest



A conflict of interest can occur when an employee's personal activities, investments or associations compromises their judgment or ability to act in the company's best interests. Every decision the employee makes should be in the best interest of the company and free from personal bias. Employees are advised to avoid these type of situations that can give rise to conflicts of interest. It is important for employees to disclose any relationships, associations or activities that could create actual, potential, or even perceived, conflict of interest to their manager or the Human Resources Department.

External Communication



Only the senior management duly give the power of attorney to represent the company to external third parties are authorized to represent the company to media and/or legal authorities. Employees should refer all requests for information or interviews to the Relation Manager.

Confidentiality



The company and its employees must maintain the confidentiality of all proprietary information. Proprietary information includes all non-public information that might be harmful to the company and its customers and business partners if disclosed.

Confidential information can include:

- Customer lists
- Supplier lists
- Pricing information
- Terms of contracts
- Company policies and procedures
- Financial statements
- Marketing plans and strategies
- Trade secrets
- Any other information that could damage the company or its customers or suppliers if it was disclosed

Anti Bribery Policy



GCKC is committed to conducting business transparently, honestly and with integrity. We comply with the applicable laws of anti bribery and anti-corruption, wherever we work across the globe. The company will not attempt to influence the judgement or behavior of a person in a position of trust by paying a bribe or kickback. This applies to persons in government and in private business.

The company does not permit payments in the form of facilitation, kickbackshospitality in all our operations and businesses.

Employees are to:

- Select third parties carefully and monitor them continuously to ensure they comply with the company's anti-bribery policies
- Always keep accurate books and records and monitor that funds are not being used for bribery or facilitation payments
- Refuse any offer or request for an unlawful payment and report the incident to the company's ethics and compliance officer

Gifts and Entertainment



The company is committed to winning business only on the merits of its products, services and people and complies with all legal requirements for giving and receiving gifts and entertainment.

Employees are to:

- Use sound judgment and comply with the law, regarding gifts and other benefits
- Never allow gifts, entertainment or other personal benefits to influence decisions or undermine the integrity of business relationships
- Never accept gifts or entertainment that are illegal, immoral or would reflect negatively on the company
- Never accept cash, cash equivalents, stocks, or other securities

When in doubt, employees should check with the ethics and compliance officer before giving or receiving anything of value.

Political Contributions



While GCKC actively supports Corporate Social Responsibility initiatives and activities in the communities wherever we work around the world, the company does not make political contributions.

Employees are free to support any political party or entity on a personal level complying with the laws of the country. However, this is kept separate from intervention and disturbance to company's business.

Charitable and Philanthropic Contributions



The company may make charitable contributions to causes and organizations that are not politically affiliated. GCKC drives to ascertain social needs through strategic philanthropic investments that build brand equity and support our business priorities. We align our philanthropic priorities with our business and brand objectives to promote learning and enrich lives. Employees should check with the Relations Manager before making any charitable contributions on behalf of the company.

Utilisation of Company Assets



The company requires all employees to protect its assets. All assets should be used correctly and responsibly for legitimate purposes, efficiently, and for company business only.

Assets include facilities, equipment, computers and information systems, telephones, employee time, intellectual data, confidential and proprietary information, corporate opportunities, and company funds.

Suspected incidents of fraud, theft, negligence, misuse, frivolous use, and waste should be reported to the Relations Manager.

Record Keeping



All documents, databases, voice messages, mobile device messages, computer documents, iCloud data, files and photos are records. Employees are required to,

- maintain these records and protect their integrity for as long as required
- maintain official record keeping systems to retain and file records required for business, legal, financial, research or archival purposes
- dispose of your records according to the company's records retention and disposition schedule

Employees should never destroy documents in response to, or in anticipation of, an investigation or audit.

Health, Safety and Environment



The company conducts business in accordance with applicable health and safety requirements across the Projects and strives for continuous improvement in its health and safety policies and procedures.

All employees are expected to perform their work in compliance with applicable health and safety laws, regulations, policies, and procedures and always apply safe work practices in all locations. There are Safety Stewards and Officers at appropriate locations at the project locations, impart continuous training to the workers and the crew to observe the safety precautions, use safety PPEs, conduct toolbox talk every day, report near-miss accidents. The company has zero tolerance towards safety hazards and has strict disciplinary follow ups to tackle safety violations. The safety officers are also trained to understand sector specific safety perils and pitfalls.

Applicable safety and health requirements must be communicated to visitors, customers, or contractors at any company location.

Employees are required to immediately report workplace injuries, illnesses, or unsafe conditions, including “near-misses.”

All our projects are engineered and designed for environmentally friendly factors. We ensure less land use and minimize carbon emissions by looking at alternative renewable energy sources and improvise the machinery efficiencies and reducing the load on the fossil fuel energy consumption. All our operations and logistics strive towards minimal disturbance to the environment, retain green cover as much as possible, and ensure sustainable living for everyone around the project. We create new solutions to reuse the treated water and develop zero liquid discharge process engineering. Our HSE policies are in strict compliance to the laws of the land across the globe.

Responsible Environmental Impact: The company and its suppliers produce measurable environmental impact reports and conduct ongoing efforts to reduce environmental pollution while increasing sustainability.

The company encourages and supports involvement in the community that has supported it. This includes supporting local business and talent by, for example, sourcing local products and services, where appropriate.

Internet & IT



The company understands that occasional personal use of the internet during work hours is a reasonable request and allows this, within reason. Employees can ask for clarification from their managers if in doubt.

However, the company does not allow internet use to support a personal business, political venture, or embarrass the company and its customers

The company expects its employees to help it safeguard all computer equipment and data against intentional malicious acts by individuals inside or outside the company. Cyber-security training is provided to all employees to ensure compliance with computer security policies.

The company safeguards against inappropriate access by individuals or groups untrained in correct company policies or procedures

The company does not use software for which it does not have a license

Data contained in log files and databases is not disclosed beyond the need of the individual departments to develop, maintain, troubleshoot, or perform diagnostics unless under direction from the Management. The casual viewing of any data contained in logs or databases that fall outside of an employee's job responsibilities is strictly prohibited.

Access to company's key business activities like design, engineering, procurement software, tendering software can be accessed only by authorised personnel.

Corporate Social Responsibility



The company understands that corporate social responsibility extends to all our projects and across all our business segments and operations.

This encompasses not only the products and services supplied but also the human rights, ethics and social practices of our company and its suppliers. We adopt local villages and specific community services like rural schools for example and provide support to improve the community education standards.

One goal of the corporate social responsibility procurement program is to build partnerships with like-minded organizations by actively seeking out business partners who are the most environmentally and workforce friendly.

Child Labor: The company and its suppliers does not employ any people under the minimum legal working age of the country in which they work.