


CORPORATE GOVERNANCE

Code of Business Conduct and Ethics (“The Code”)

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The **Code of Business Conduct and Ethics** (the "Code") is applicable to all employees (referred to as "we," "us," "our," or "the company"), whether on-roll or off-roll, associates on third-party payroll, trainees of Space World Group LLP and across all its managed entities. In the Code, they are being referred to as the Space World Group or the Company.

As part of our overall ambition to become one of the most progressive Group, we are focused on creating an ecosystem and mindset across all our entities to make them the most trusted brand in their respective industry segment. It is imperative that we must ensure non-negotiable commitment to adherence to the Code.

At Space World Group LLP and its managed entities, we are fully dedicated to maintaining the highest ethical standards in our corporate conduct, and our code of ethics reflects this dedication. These core principles guide us to always act with integrity, make the right decisions, and choose actions that benefit our customers, support our communities, and inspire our team members. As we continue our transformative journey, every employee, as a brand ambassador of Space World Group, holds personal responsibility for ensuring their behavior aligns with and upholds both the letter and spirit of the Code of Business Conduct and Ethics. Protecting our reputation and embodying the values within this code are essential. This code serves as a guiding light, helping us make decisions that affect our organization and clarifying what is acceptable and what is not.

We take immense pride in the work we do and the approach we take, which is why we hold ourselves to the highest ethical standards in all our actions. The Code, in conjunction with our Group Values - iCEEN (Integrity, Care, Entrepreneurship, Excellence and Nimbleness), is designed to steer your decisions and actions, clearly outlining the expectations placed upon you. It also provides guidance on navigating difficult situations and raising concerns when necessary. They are also ingrained in our Brand attributes of 4Cs – Can Do, Create, Connect and Care which will form the umbrella of our initiatives going forward and will guide us on our way of working. Our commitment is to conduct business with the highest level of integrity, honesty, and compliance with all relevant laws and regulations, while faithfully following the principles of the Code and maintaining responsible business practices.

The Code serves as a framework to ensure our actions align with our values and help define our group identity. It complements our core values by outlining the behaviors and decisions that best reflect what is most important to us. By consistently adhering to the Code and embodying our values, we reinforce the core principles of our company and pave the way for lasting success. It's crucial to understand that it's not only about what we achieve, but also about how we achieve it, ensuring we build a sustainable and resilient business model. It is imperative we uphold the Code of Business Conduct and Ethics and manifest it in all our actions.

We are confident that we will continue to be a corporate model for transparency, ethical business practices and good governance. Let us make Space World Group including all its managed entities the most preferred companies to work with – for its employees, customers and other stakeholders.

If you have questions, need clarification, or are unsure of how our Code applies to your specific situation, do not hesitate to reach out to HR and Legal for answers. Adhering to these ethical principles is fundamental to our future success.

Thank you for your continued dedication to Space World Group and its managed entities, and for your commitment to upholding the standards set forth in the Code.

Yours Truly

Ankit Goel
Founder & Chairman

Radhey R Sharma
Co-Founder & Director

Scope and Applicability:

This Code applies to all Employees (on-roll or off-roll, associates on third-party payroll, trainees, contractual associates and so on) across all group companies of Spaceworld Group LLP.

- Space World Group LLP
- Space Telelink Ltd.
- RANext Technologies Pvt. Ltd.
- Horizon Performance Polyurethane Pvt. Ltd.
- Space World Digital Solutions Private Ltd.
- P2P Networks Private Limited
- P2P Networks (Mumbai) Private Limited

collectively referred to as “the Company” for the purpose of this policy document.

Our Guiding Principles:

The following guiding principles stem from our Purpose and Values:

1. We commit to treating our colleagues with respect, trust, humility, and compassion, believing in their ability to contribute their fullest potential in the best interests of the Group.
2. We hold that conducting business with integrity, honesty, and transparency is essential, as this ensures a mutually beneficial outcome for all – Group, Entity and the Individual.
3. We recognize our mutual interdependence, united by a shared purpose, and work collaboratively to foster long-term relationships built on trust and confidence by keeping our promises and honouring our commitments to colleagues, superiors, consumers, customers, and business partners across various functions and regions.
4. We challenge the status quo and continuously innovate to drive the respective Entity growth.
5. We use sound business judgement to achieve success while minimizing the risk.
6. We empower ourselves to make informed decisions by ensuring timely, honest, and complete communication.
7. We openly share our experiences and lessons learned, including both successes and setbacks.
8. We address disagreements constructively, always prioritizing the greater good of the group / entity.
9. Ask, when in doubt.
10. We are committed to protect Group and its managed entities reputation.

The **aim of the Code of Business Conduct and Ethics** is to foster:

- Honest, fair, and ethical conduct, including the responsible management of conflicts between personal and professional relationships.
- Safeguarding and proper utilization of company assets and confidential information.
- Adherence to all relevant laws, rules, and regulations.
- Promptly reporting any breaches of the Code to the designated authorities.
- Fostering a workplace culture that aligns with our Values.
- Promoting a fair and inclusive environment with equal opportunities for all.

SUMMARY OF CODE PRINCIPLES:

SAFEGUARDING COMPANY ASSETS, RESOURCES, AND INFORMATION:

- We are entrusted with confidential information about the company, clients, employees, and partners. Protecting this information is vital to maintain our business integrity and comply with our IT Policy.
- All business communication should be conducted through approved systems. Personal emails, unapproved messaging platforms, and social media should not be used for work-related tasks.
- Employees must complete mandatory IT training and be cautious with cybersecurity by avoiding suspicious attachments and links.

ACCURACY OF BOOKS AND RECORDS:

- We are committed to providing accurate and honest information in all records, reports, and documents, ensuring they are complete and authorized.
- All disclosures and communications, in case needed, to be made to the market are fully accurate and truthful.

ACCOUNTABILITY TO STAKEHOLDERS:

- The company's reputation is one of its greatest assets. We must engage responsibly with clients, suppliers, customers, competitors, and stakeholders to protect this reputation.

COMMUNICATION AND MEDIA:

- Company communications, such as emails, are permanent records. It is essential to exercise professionalism and care when using these tools.
- Ensure your social media and online presence aligns with the company's values and contributes positively to the organization's image.

AVOIDING CONFLICTS OF INTEREST AND PROPER CONDUCT:

- Your personal actions should reflect the company's core values and ethical standards.
- Be mindful of situations where personal interests may conflict with the company's interests and take steps to prevent these conflicts.

FOSTERING A POSITIVE WORK ENVIRONMENT:

- We value diversity, equity, and inclusion, and are committed to creating a welcoming and safe workplace for all employees.
- Our success depends on cultivating an environment free from discrimination, harassment, and other negative behaviours.

COMPLIANCE WITH LAWS, REGULATIONS, AND COMPANY POLICIES:

- Operating across different regions means we must follow various laws and regulations. It is essential to understand and comply with these legal requirements in every aspect of our work.
- Company policies must be adhered to as they guide how we conduct business and interact with each other.

FREQUENTLY ASKED QUESTIONS

WHY IS A CODE NECESSARY?

The Code serves as a guide for your conduct as a member of the Space World Group. It is crucial for preserving the company's values and ensuring compliance with legal, regulatory, and ethical standards, which are fundamental to our operations and reputation. Following the Code helps us uphold these important principles.

WHO IS REQUIRED TO COMPLY WITH THE CODE?

The Code applies to all Directors, CEOs, On-Roll Employees, and Off-Roll Associates (those on third-party payroll). It is to be noted that, wherever the term Employee is used, the relevant clause of the code shall also be applicable to off-roll associates (on third party payroll).

WHAT ARE MY OBLIGATIONS?

Every individual has two main responsibilities:

- You must comply with every aspect of the Code and reaffirm your commitment annually. You have to live by the Code and lead by the example.
- If you suspect a violation of the Code or any related policies, it is your duty to report it. Concerns can be raised by following the procedure in the "Reporting Potential Code Violations" section.

Speak Up! We are all responsible for protecting Space World Group and its managed entities - ethical culture and success.

HOW CAN I IDENTIFY A POTENTIAL ISSUE?

While the Code addresses many common situations, it can't cover every possible scenario. If you are unsure about a particular action, ask yourself:

- Is this illegal?
 - Does it seem wrong or unethical?
 - Would I feel uncomfortable if others found out about it?
 - Could it damage the company's reputation or my own?
 - Is there a conflict between my personal interests and the company's interests?
- If you answer "yes" to any of these questions, your actions may violate the Code, and you should seek advice.

HOW DO I SEEK ASSISTANCE?

If you have any questions about the Code or policies or need guidance on the right course of action in a specific situation, contact your Reporting Manager, CEO, Entity HR or Group HR.

CAN I MAKE ANONYMOUS REPORTS?

Yes, you can report concerns anonymously via **phone: 011-23071071**, email ombudsperson@spaceworld.in or courier addressed to Ombudsperson at Space World Group LLP, 22 A, JLG House, Windsor Place Janpath, Connaught Place, New Delhi – 110001. If you choose to remain anonymous, your identity will be protected to the extent allowed by law. However, keep in mind that anonymity might limit the company's ability to investigate the matter fully.

WHAT ARE THE CONSEQUENCES OF BREACHING THE CODE?

Violating the Code, our policies, or legal requirements can have serious consequences for both individuals and the company. Disciplinary actions, including termination for cause, may be taken against employees. In some cases, violations may lead to legal consequences, including civil or criminal charges, fines, penalties, or imprisonment.

INTRODUCTION

The Code of Business Conduct and Ethics (the “Code”) applies to all Directors, CEOs, employees (On Roll), Associates (Off Roll - on third-party payroll) of Space World Group LLP and all its managed entities (“SWG”, “we,” “us,” “our” or the “company”)

STANDARDS OF BUSINESS CONDUCT

Our aim is to uphold and enhance a reputation grounded in honesty, transparency, trust, integrity, and professionalism. The trust and confidence our stakeholders place in Space World Group and its managed entities are invaluable to us, and we are committed to safeguarding this trust. In many ways, our reputation stands as our most important business asset. As such, all our actions must be carried out with integrity, honesty, and in full compliance with all relevant legal and regulatory standards.

We have established the Code and associated policies and procedures to maintain our organizational culture and ensure adherence to legal, regulatory, and fiduciary obligations. We expect everyone to fully comply with both the letter and the spirit of the Code (as well as related policies and procedures). The following corporate policies and programs are part of this framework and should be reviewed alongside the Code:

- Anti Bribery and Corruption Policy
- Whistle-Blower Policy
- Gifts, Entertainment and Hospitality Policy

SAFEGUARDING COMPANY ASSETS, RESOURCES, AND INFORMATION

Company assets are intended for legitimate business purposes.

We are all responsible to protect and preserve the company’s assets, which include both physical items like office supplies, furniture, and computers, as well as intangible assets such as emails, intellectual property, and proprietary information. These assets must be used appropriately and solely for business activities, not personal use. The company’s name, logo, facilities, and relationships are valuable assets and must only be utilized for authorized business purposes. Under no circumstances should these assets be used irresponsibly or for improper reasons. Only legally licensed software should be installed on company devices. Limited personal use of company assets is allowed, provided it is done in moderation and does not interfere with work responsibilities. Upon leaving the company for any reason, all company assets must be returned promptly and in good condition, subject to normal wear and tear.

We must protect our passwords and access codes by following password protection policies and must not share our accounts with others. Company information should not be transferred to unauthorized portable devices. If sharing company information with external parties, ensure that a non-disclosure agreement is signed beforehand. Emails, instant messages, and text messages should be crafted with the same care as any other company document. The company reserves the right to monitor and track the use of its assets and communications, such as emails and internet usage, under appropriate circumstances.

You are accountable for ensuring that company resources are not misused when submitting reimbursement requests. All reimbursement claims for approved company expenses should be for genuine business-related costs. If you are uncertain whether an expense qualifies, please consult the company’s Travel Policy for guidance or HR.

Confidential information must always be safeguarded

We are responsible for protecting all confidential information in our possession, whether it pertains to the company, customers, suppliers, or other third parties. This includes, but is not limited to,

confidential documents, notes, lists, and records, both in physical and electronic forms.

Access to company confidential information is granted on a need-to-know basis. Such information must be kept secure both during and after employment and cannot be used for personal benefit. Company confidential data should be carefully managed and only used for its intended purpose, discussed only with authorized individuals or organizations on a need-to-know basis. We must not share or disclose company information to unauthorized parties unless proper approval is obtained. Both physical and electronic copies of confidential information should be protected, even when taken outside the office, such as when working from home or attending external meetings.

Additionally, be cautious when discussing company matters in public places like elevators, restaurants, or on public transportation, or when using personal devices outside of the office. Ensure confidential information is never left unattended in conference rooms or public areas where others might access it. Furthermore, to ensure data security, you must be cautious of cybersecurity risks, such as opening unknown attachments or clicking on suspicious links, immediately reach out to IT team in case of such a scenario. If you become aware of any confidential information about the company or another entity that may have been accidentally disclosed, seek guidance from your Reporting Manager or HR before taking any further action.

Personal data held by the company or on its behalf must be managed in accordance with data protection laws.

The company collects personal data about individuals both within and outside the organization when we have a lawful basis to do so. This is essential for the effective and efficient operation of our business. Personal data can include, but is not limited to, sensitive personal, medical, and financial information. Generally, personal data will only be retained by the company for as long as it serves a legitimate business purpose. We are committed to safeguarding the personal data of all individuals we engage with, in line with legal requirements and company policies.

It is your responsibility to ensure that personal data is kept confidential and only accessible to authorized individuals within the company who need it to perform their duties. If it is necessary to share personal data with a third party (such as for the provision of services or business acquisitions), you must ensure that this transfer complies with applicable laws and regulations. This may involve ensuring that the third party is bound by a written agreement, such as a Non-Disclosure Agreement, with confidentiality clauses. In all other circumstances, personal data should only be disclosed in response to a legal or regulatory requirement.

You are expected to familiarize yourself with and comply with our IT policies.

Proper Use of Generative Artificial Intelligence (AI) Tools

The use of generative AI tools (such as ChatGPT, DALL-E, or similar platforms) must be guided by principles of responsibility, transparency, and ethical standards.

- Use AI responsibly, ensuring its outputs support ethical, legal, and accurate work.
- Never input or share confidential, proprietary, or sensitive personal data into generative AI platforms. Moreover, generative AI tools are constrained by the data they are trained on, which may be incomplete or outdated. This limitation could lead to the generation of inaccurate or unreliable information. Therefore, confidential, non-public, personal, or proprietary information must not be shared with generative AI tools.
- Be cautious of content generated by AI that may infringe on intellectual property rights.
- Proper citations or acknowledgments must be used if AI-generated content is used externally. AI-generated content should not be presented as entirely original human work without appropriate disclosures or review.
- AI should assist, not replace, human judgment. All outputs from generative AI must be reviewed and validated by the user before use or publication.
- Employees remain fully accountable for the quality, accuracy, and appropriateness of the final work product.
- Any misuse of AI tools—such as using them for fraudulent, harmful, or non-business-related purposes—will be considered a violation of the Code of Conduct and may lead to

disciplinary action.

Furthermore, any output produced by generative AI tools must be carefully reviewed for accuracy and quality. It remains the responsibility of the Company, its employees to ensure the integrity and accuracy of their work, including any decisions or judgments made based on AI-generated content.

Intellectual Property is the Property of the Company

Throughout your employment, you may contribute to the creation, development, or invention of intellectual property, including but not limited to concepts, methods, processes, inventions, trade secrets, confidential information, know-how, physical products, ideas, plans, programs, software, applications, code, works of authorship, trademarks, service marks, and designs—whether individually or in collaboration with others. This includes any enhancements or modifications to existing intellectual property owned by the company. All such intellectual property, along with any associated rights, will be the exclusive property of the company, and you waive any moral rights related to these creations.

You are expected to fully cooperate with the company in ensuring that all intellectual property and associated rights are assigned to the company, including helping with the preparation and execution of necessary documents, such as assignments or registration applications with relevant government bodies, to secure the company's ownership.

Preservation of Company Documents

It is essential to ensure the proper management and retention of the company's records. You are expected to adhere to the guidelines outlined in our document retention policies and comply with any applicable legal and regulatory obligations. If you are informed that any of your documents are pertinent to ongoing or upcoming litigation, investigations, or audits, you must comply with the instructions provided by the legal team regarding the retention of those documents.

ACCURACY OF BOOKS AND RECORDS:

Ensure that the Company's records are complete and accurate and that all business transactions are properly authorized.

It is essential to ensure that the company's records are both comprehensive and precise, with all business transactions being properly authorized and documented.

All reports and information related to the company must be captured and presented with accuracy, integrity, fairness, and in compliance with applicable accounting standards, legal regulations, and good business practices. This applies to various forms of documentation, including but not limited to attendance records, expense reports, accounting data, correspondence, bids, purchase orders, and similar documents, all of which must be truthful and complete.

The company's books and records must accurately reflect all transactions to facilitate the preparation of correct financial statements. Falsifying any records or entries for any reason is strictly prohibited. Employees must never hide any information from (i) external auditors, (ii) internal auditors or (iii) Group Financial Controller. Additionally, it is illegal for anyone to attempt to influence, manipulate, or deceive an external auditor in any way.

The contracts and agreements that govern the company's business interactions are key to maintaining its legal standing. As the laws surrounding contracts can be complex, we have established procedures to ensure that any agreements entered into by the company receive appropriate approval. Employees authorized to sign contracts on behalf of the company must ensure these documents undergo the necessary review by the legal team, as required by company policies or practices. If uncertain whether a contract requires review, employees should consult with Legal and HR.

Ensure that the company provides full, true, and plain disclosure

Employees involved in preparing the company's public disclosures or providing information for this purpose must ensure that all such disclosures are truthful, transparent, and made with accuracy. Employees are required to report any of the following: (a) fraud or deliberate errors in the preparation, review, or audit of financial statements or records; (b) weaknesses in or noncompliance with internal controls over accounting; (c) any misrepresentations or falsehoods in public disclosure documents, such as annual reports, quarterly filings, prospectuses, information/proxy circulars, and press releases; or (d) any failure to disclose the company's financial status in a full, fair, and clear manner.

Furthermore, individuals in financial reporting oversight roles, as well as their immediate family members (such as spouses or partners), are prohibited from receiving any tax or other services from the company's external auditor, regardless of whether the company or the individual personally covers the cost.

ACCOUNTABILITY TO STAKEHOLDERS:

Engage with Stakeholders in a Fair and Ethical Manner

You are expected to interact with the company's customers, suppliers, local communities, competitors, and other stakeholders in a fair and transparent manner. To protect our reputation and maintain strong relationships, refrain from engaging in any actions that could be deemed unethical or unlawful when interacting with stakeholders or competitors.

COMMUNICATION AND MEDIA:

Use of Company Communication Tools and Information Security

All business-related communication should be conducted using the company's approved email system or other systems provided by the organization for official use. These tools should be set up by the company's IT Team on your devices. It is important to use our email, internet, telephone, and other communication tools responsibly and professionally. Employees, CEOs and Directors are required to comply with IT policies, as well as all relevant policies.

While limited personal use of these tools is permitted, it should not interfere with your professional responsibilities or be excessive. As stated in the principles of this Code, business communications must not be conducted using personal email accounts, text messages, unauthorized chat platforms, or social media channels. Employees, CEOs and Directors must avoid sending business-related information to personal email accounts or storing company data on personal devices. When using company-issued technology, such as computers, smartphones, or voicemail, be aware that communication may not be private. These resources are subject to monitoring to ensure proper use and compliance with company policies, laws, and regulations. Care must be taken when using company systems and devices to prevent the introduction of viruses or malware, especially from suspicious or unsolicited emails. If you suspect a message or attachment might contain harmful content, inform the IT department immediately. Extra caution is required when using company devices outside the office, and you must follow any guidelines provided to prevent compromising the security of our systems.

All confidential information handled through these systems must be treated with utmost care, in compliance with data protection laws and the company's IT Policy.

Exercise Caution When Using Social Media

The company's policy regarding social media usage is clear: unless specifically authorized, you are prohibited from commenting on, posting about, or discussing our group company or its managed entities, its customers, or its business activities, including investments, securities, and related matters, on any social media platform. This includes, but is not limited to, social networks, chat rooms, wikis, virtual platforms, and blogs (collectively referred to as "social media"). As an employee, you represent the company in all online activities, and it is crucial that your conduct

aligns with our company values.

To mitigate the risks linked to social media usage, we rely on sound judgment, just as we would in any professional setting. When engaging on social media, we make sure to include a disclaimer to clarify that any personal opinions expressed are not representative of the Company's official stance or the views of the Company. It's important to avoid making any comments, inferences, or statements about the Company that could potentially be misinterpreted.

Post or content published by you should not create a conflict of interest, either actual or perceived. You are welcome to share personal photos of yourself on social media. However, when posting photos or content involving others, especially in social settings such as parties or events, please ensure that you have obtained explicit consent from those individuals before sharing images. Specifically, posting pictures of others in any situation that could be seen as inappropriate, or embarrassing is strictly prohibited unless you have received their clear approval. Respect for others' privacy and dignity is essential in maintaining a professional and positive online presence.

Do Not Represent the Company Without Authorization

You may be contacted by a member of the media, a shareholder, a financial analyst, a governmental authority or any other third party for information about the company, and your response can have far-reaching implications, including effects on our ability to compete. If you receive a request from outside the company to speak on the company's behalf and you are not authorized to do so, refer the request to your Reporting Manager or HR, who may forward the request to the Group CHRO. We must not communicate on behalf of our company, even if the statement is online, unless we are an authorized spokesperson for the Company

AVOIDING CONFLICTS OF INTEREST AND PROPER CONDUCT:

Exhibit Personal Behaviour that Promotes a Positive Image for both you and the Company

Your actions, both inside and outside of work, should consistently reflect positively on you, the company, its business operations, clients, and our Group company. It is critical to demonstrate sound judgment in all your interactions, whether personal or professional. Refrain from participating in activities that could tarnish the reputation of the company or your own, and that could undermine the trust between you and the organization. Any Director or Employee found to have engaged in inappropriate conduct may face disciplinary measures, up to and including termination.

When participating in personal endeavours outside of work, remember your obligations to Space World Group and its managed entities. Seek approval before engaging in any business activities beyond your role within the company. The company encourages Directors, CEOs and employees to take part in community activities but be mindful that such involvement must not interfere with your ability to fulfil your responsibilities to the company. Furthermore, your personal or political activities must not conflict with or negatively affect the company's interests. Ensure that, when engaging in such activities, you are not mistakenly seen as representing the company unless you have explicit permission.

Outside Business Activities (OBAs)

OBAs include any business engagements outside the scope of your role within the company. These may involve activities as an employee, contractor, owner, director, or partner of another business. Employees are required to obtain approval from the Group office before taking on any OBA. CEOs must also inform the Chair of the Board before pursuing any such activities. However, approval is not necessary for roles on charity boards or small private family holding companies with no connection to the company. Approval is required if you plan to join the board of a private company with significant operations. If you are uncertain whether approval is needed, reach out to the Group CHRO.

Avoiding Conflicts of Interest

A conflict of interest arises when personal interests interfere with your ability to act in the company's best interest, whether consciously or unconsciously. A conflict can occur if you are involved in any activity that compromises your objectivity, effectiveness, or ability to make decisions in the company's favour. Your personal interests should never take precedence over the company's needs,

particularly in relation to the company's commitments to its clients.

A conflict of interest may also arise from a close personal relationship with another employee at Space World Group or its entities. If you are in such a relationship, you must disclose it to Human Resources to ensure it is managed appropriately. For this policy, a "close personal relationship" includes, but is not limited to, relationships with family members, close friends, romantic partners, or any individual with whom you share an intimate or personal relationship.

To avoid potential conflicts, assess whether a well-informed individual would think your personal interests or relationships could influence your professional decisions. If you are unsure, consult with Human Resources. CEOs should consult the Chair of the Board when in doubt. Additionally, if you learn of a potential conflict involving another employee or CEO consult the Group CHRO for guidance.

Do Not Exploit Corporate Opportunities for Personal Gain

You are prohibited from taking advantage of any business or investment opportunities you become aware of through your work at the Company. You have a duty to act in the company's best interest and must avoid competing with the company in any way. Any opportunities that arise during your employment should be used to advance the company's goals, not for personal benefit.

FOSTERING A POSITIVE WORK ENVIRONMENT

Commitment to a Respectful Workplace

Our company is dedicated to fostering a work environment that is free from discrimination, violence, and harassment. We maintain a strict zero-tolerance policy against any form of unlawful discrimination or harassment in the workplace. Discrimination based on age, gender, disability, religion, nationality, ethnicity, sexual orientation, disability, HIV positive status or any other personal characteristic protected under various applicable law(s) is strictly prohibited. Every Director, CEO and employee must contribute to maintaining a safe, respectful, and professional atmosphere, where values like integrity, fairness, and respect are prioritized.

Duty to Report Discrimination, Violence, and Harassment

If you encounter or become aware of discrimination, violence, or harassment, it is your responsibility to report to Ombudsperson - as outlined in the "Reporting Potential Code Violations" section of the Code of Conduct. All reports of such incidents will be taken seriously and investigated thoroughly. Any employee found guilty of discrimination, violence, or harassment—whether direct or through condoning such behaviour—will face corrective actions, including possible termination for cause.

We aim to cultivate a culture where reporting discrimination, violence, and harassment is encouraged, as these actions are essential for eliminating such behaviors. While we reserve the right to take action against false accusations, individuals making genuine reports or assisting in investigations will not face retaliation.

For more information on "Reporting Potential Code Violations", refer to the company's Whistle Blower Policy.

Commitment to Health and Safety

Everyone has the right to a safe and healthy work environment. To help achieve this, all employees must:

- Adhere strictly to all occupational health and safety laws and internal laid out procedures.
- Avoid engaging in unsafe or illegal behaviours such as gambling or any forms of violence.

Prohibited Conduct:

- Possessing, distributing, or being under the influence of drugs or alcohol while on company premises or conducting company business.
- Carrying weapons, firearms, or any combustible materials at company facilities or during company-related activities.

If you or someone else is in immediate danger of serious harm, call law enforcement first and then report the incident according to the "Reporting Potential Code Violations" section.

Human Rights and Modern Slavery

Our company is committed to ethical practices that respect human rights. This includes:

- Implementing leading health and safety protocols to achieve zero serious safety incidents.
- Ensuring that community interests, safety, and well-being are considered in business decisions.
- Promoting equality in employment practices.
- Prohibiting child labour, forced labour, and any form of abuse, both physical and mental.

We integrate these standards into our business activities, including training, communications, contracts, and due diligence procedures. This commitment extends to our key suppliers and business partners.

Environmental, Social, and Governance (ESG) Management

We believe that acting responsibly toward all stakeholders is essential for building a sustainable and profitable business. Our ESG principles are embedded in every aspect of our operations, helping to create long-term value for our investors and other stakeholders. These principles include:

- Environmental Responsibility:
 - o Minimize the environmental impact of our operations and improve resource efficiency.
 - o Support the target of achieving net-zero greenhouse gas emissions, to the best possible, by 2050 or sooner.

To the best of our ability, we are committed to sustainable practices that promote the well-being of our planet. This includes minimizing waste, promoting recycling and reuse, and ensuring environmentally sound disposal of all materials used in our operations.

- Strong Governance:
 - o Maintain the highest ethical standards in all business activities, in line with our Code of Business Conduct and Ethics.
 - o Foster transparency and engagement with our stakeholders.
- Corporate Citizenship:
 - o Support and encourage philanthropy and volunteerism (Corporate Social Responsibility) by our Directors, CEOs and Employees, ensuring that the interests of the communities we operate in are integrated into our business decisions.

We should avoid actions that can harm the environment, such as air, land, or noise pollution, and keep our workspaces clean and safe for ourselves, colleagues, customers, and visitors. We are dedicated to helping create a better environment by using resources like water and energy wisely. We will keep working to improve the environmental impact of all our office activities and business operations.

We are committed to being responsible corporate citizens. This means conducting our business ethically, respecting human rights, minimizing environmental impact, and contributing positively to the communities where we operate

COMPLIANCE WITH LAWS, REGULATIONS, AND COMPANY POLICIES:

Follow all laws, regulations, and company policies

Make sure to understand and follow all laws, rules, and policies relevant to your role. These rules can change, so if you're unsure about how they apply to your work, ask the company's Group CHRO for clarification. If you know of any activities that might be illegal, you must report them. Ignorance of the law is not an excuse. It is your responsibility to familiarize yourself with and follow all applicable rules.

Do not trade based on confidential information

If you have access to important non-public information about the company, you cannot use it for personal financial gain or share it with others. This includes not sharing sensitive information with colleagues who don't need it for their work. Violating this policy can lead to termination and legal consequences.

No bribes or improper payments

Our company values honesty and integrity, and we expect the same from you. We do not allow bribes, directly or indirectly, to be paid on our behalf. This includes gifts, travel, or other forms of payment intended to gain an unfair advantage. Always be cautious when working with third parties, and ensure their actions align with our standards. A bribe refers to anything of value that is given, offered, or promised with the intention of improperly influencing a decision or gaining an unfair advantage in securing or maintaining business. Bribery can take many forms beyond cash, such as gifts, travel, hospitality, political donations, charitable contributions, job opportunities, internships, or temporary assignments. Facilitation payments are also considered bribes and are not allowed. Report any suspected improper payments and consult your manager or the Group CHRO if you're unsure.

Gifts and entertainment

Gifts and entertainment may be acceptable in some cases, but they must be modest, appropriate for the business relationship, and should not create conflicts of interest. Cash gifts are not allowed, and gifts to public officials and other customers are only acceptable under certain conditions like Diwali gifts as prescribed in Gifts and Entertainment policy. Violations can result in severe consequences for you and/or the company, including findings of violations of laws, disciplinary action (up to and including dismissal for cause), and related civil penalties. For further details, refer to Gifts, Entertainment Policy.

Political contributions

The company strictly prohibits making political donations using company funds, whether directly or indirectly. The donation of funds, whether direct or indirect, to political parties, public officials, political campaigns and / or candidates for political office, with resources of the Company, is strictly prohibited. You cannot encourage others to contribute either. To ensure that we do not breach the law regarding political donations, all political donations, no matter how small, must be approved by the Group Financial Controller and Group CHRO in advance.

Prevent money laundering and illegal activities

We are committed to preventing money laundering, terrorist financing, and other criminal activities. Always be cautious when dealing with third parties and check to make sure they are not associated with sanctioned entities. If you have concerns, contact the Group CHRO for clarification.

Regulatory authorities may provide lists of individuals and organizations from whom the company is not allowed to accept or send funds, in accordance with anti-money laundering laws. All Directors, CEOs and employees are responsible for ensuring that the parties they engage with are not connected to sanctioned governments, groups, individuals, or entities. This includes obtaining anti-money laundering assurances from counterparties through documents, which can be provided by the Group office upon request.

Providing information to government authorities

If you are contacted by government authorities seeking information related to your work, you should consult with Group Financial Controller and Group CHRO before responding. This is for your protection, and legal advice may be sought if necessary. However, you can provide information under whistleblowing regulations if required.

Report any criminal convictions

Our company's reputation is built on the integrity of the individuals who work with us, whether as Directors or CEOs or employees. At Space World Group and its managed entities, we conduct thorough background checks to ensure we have the best possible information about our potential hires. Once you are a part of the company, we expect you to maintain a commitment to openness, honesty, and transparency. If you are convicted of a felony or misdemeanor, or if you are involved in any situation that could impact your reputation during your time with the company, it is your responsibility to report this to Entity HR / Group CHRO, so it can be properly documented. This ensures transparency and helps maintain the company's good standing.

REPORTING POTENTIAL CODE VIOLATIONS

It is your responsibility to report in good faith. Reporting any suspected violations of the Code, illegal activities, or unethical behavior is crucial to the company's success and is both expected and appreciated. If you observe or become involved in any misconduct, it is your duty to promptly report it. When making a report, provide as much detail and supporting documentation as possible to help ensure the issue can be properly investigated. Vague or unsupported claims are harder to address effectively.

All Directors, CEOs and employees should first report any misconduct or Code violations to their supervisor, as they are typically best positioned to handle the situation. Alternatively, you may contact the Group CHRO to report concerns or ask questions about potential violations. If you have concerns about the company's whistleblowing policy, please reach out to the Ombudsperson. If for any reason you are uncomfortable reporting a violation to your supervisor, HR, or legal counsel, you may also use the Ombudsperson channel. You can also send an anonymous email if preferred. If you choose to report anonymously, your confidentiality will be protected to the fullest extent allowed by law.

All reports will be kept confidential and handled appropriately. We will maintain confidentiality to the extent possible while conducting a thorough review, in accordance with applicable laws. Although you may choose to remain anonymous, providing your identity may help with the investigation.

We do not tolerate retaliation. There will be no retaliation against anyone who reports in good faith a potential violation of the Code, laws, or regulations. However, making a report does not automatically absolve you or anyone else from responsibility for the violation. The company may take disciplinary action if false or knowingly untrue reports are made. You must reasonably believe that the information you provide is truthful and reflects a potential violation of the Code. If you feel you've been unfairly retaliated against, report it to your supervisor, HR, or Group CHRO.

Cooperation in investigations is required. All Directors, CEOs, employees, and off-roll associates must cooperate fully in any internal investigations related to allegations of illegal or unethical behavior. In these investigations, you are expected to provide accurate, honest, and complete information.

CONTACT INFORMATION

Reporting channels	Contact information
Phone	011 - 23071071
Email	ombudsperson@spaceworld.in
Address	Space World Group LLP, 22-A, JLG House, Windsor Place, Janpath, Connaught Place, New Delhi - 110001

DISCIPLINARY MEASURES FOR CODE INFRACTIONS

Please be advised that the company retains the right to impose disciplinary measures in response to any violations of the Code, depending on the nature and specifics of the violation. These actions could range from immediate termination for cause to potential legal action if deemed necessary.

COMPLIANCE ACKNOWLEDGEMENT

Upon joining Space World Group / its managed entities, all on-roll employees and off-roll associates will be provided with a copy of the Code and will be required to acknowledge receipt and understanding. This acknowledgment is kept on record by the Head HR of each entity. On an annual basis, all employees and off-roll associates must reaffirm their adherence to the Code. Continued employment at the company is contingent upon signing an annual Statement of Compliance with the Code and its associated policies.

CODE AMENDMENTS

The Space World Group Board of Directors will review and approve the Code at least once every year, and it holds the ultimate responsibility for overseeing compliance with the Code.

LEGAL DISCLAIMER

Space World Group reserves the right to modify, suspend, or revoke the Code, as well as any related policies, procedures, or programs, at any time. The company also has the sole discretion to interpret and amend the Code and these policies. Any changes to the Code will be communicated and disclosed in accordance with applicable laws.

The Code and any referenced policies do not grant any rights, privileges, or benefits to employees, nor do they establish an entitlement to ongoing employment with the company or create an express or implied employment contract between the company and its Directors, CEOs or employees. Moreover, the Code does not alter the terms of employment between employees, CEOs, Directors and the company.

The most current version of the Code is available on our website and intranet. In case of any discrepancy between printed copies and the online version, the latter shall take precedence.

CODE OF BUSINESS CONDUCT AND ETHICS

Space World Group and all its managed entities employees are required to read and follow the Code of Business Conduct & Ethics and Policies. The Code may also be viewed at Keka HRMS Internal Portal.

STATEMENT OF COMPLIANCE

I hereby acknowledge that I have reviewed and understood the Code of Business Conduct & Ethics ("the Code") and policies of Space World Group and all its managed entities ("the Company").

I recognize the importance of the Code in ensuring the proper conduct of business within and on behalf of the company.

I understand my responsibilities as outlined in the Code, and I acknowledge my shared duty to prevent, address, and, if necessary, report any suspected violations of the Code that may come to my attention.

I am committed to adhering to the Code, including its provisions regarding the nondisclosure of information both during and after my appointment or employment.

To the best of my knowledge, I am not involved in any situation that conflicts with, or may appear to conflict with, the Code.

I understand that violations of the law, the Code, or company policies may lead to disciplinary action, in accordance with local laws and internal procedures.

I also confirm that I have read, understood, and will comply with the aforementioned policies, procedures, codes, and instructions.

Furthermore, I agree to notify to Ombudsperson, using the methods specified in the Code of Conduct, of any changes that may impact my compliance with the Code.

Company Name:

Employee Name:

Employee Code:

Department/Function:

Location:

Date: