



Code of Business Conduct & Ethics Policy

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Approved on	February 23, 2022
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Sula Vineyards Limited (SVL)

Code of Business Conduct & Ethics Policy

Commercial SOP #	
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Contents

1. ABOUT OUR CODE OF CONDUCT & YOUR RESPONSIBILITIES	3
1.1 To whom the Code applies.....	3
1.2 How to use the Code of Business Conduct.....	3
1.3 Employee Responsibilities.....	3
1.4 Cooperating with surveys, investigations and inquiries	4
1.5 Ethical Leadership	5
1.6 Make the right choice.....	6
1.7 Asking questions and raising concerns	6
1.8 Preventing Retaliation	7
1.9 Accountability and discipline	7
2. ACTING IN THE BEST INTEREST OF OUR CUSTOMERS & BUSINESS PARTNERS.....	7
2.1 Customer Relations	7
2.2 Protecting Customer Information.....	8
2.3 Supplier Selection	8
2.4 Conflicts of Interest.....	9
2.5 Communicating with the public.....	10
2.6 Social-media and networking	10
3. PROTECTING OUR INFORMATION AND ASSETS.....	11
3.1 Confidential Information.....	11
3.2 Protecting personal information and the privacy of employees	11
3.3 Business Records and Internal Controls.....	12
3.4 Safeguarding Company Assets	13
4. FOLLOWING THE LETTER AND THE SPIRIT OF LAWS AND REGULATIONS	13
4.1 Insider Trading	13
5. PERFORMANCE THROUGH TEAMWORK AND RESPECT	14
5.1 Diversity and Non-Discrimination	14
5.2 Harassment free workplace	15
5.3 Safe and healthy work environment.....	15
6. Annexure A – Vendor Code of Conduct	16
7. Annexure B – Customer Code of Conduct.....	17



Code of Business Conduct & Ethics Policy

SOP #	
Version	1
Approved on	February 23, 2022
Effective from	February 23, 2022

1. ABOUT OUR CODE OF CONDUCT & YOUR RESPONSIBILITIES

1.1 To whom the Code applies

The Code of Business Conduct (COBC) provides the ethical guidelines and expectations for conducting business on behalf of Sula Vineyards Limited, its subsidiaries and affiliate companies. In the COBC, these are commonly referred to as “Sula Vineyards” or “the Company.” The COBC applies to all employees and members of the Board of Directors of the Company. It also applies to individuals who serve the Company on contract, subcontract, retainer, consultant or any other such basis.

Suppliers, service providers, external professionals, agents, channel partners (dealers, distributors and others) serve as an extension of the Company and their conduct and behaviour while carrying out business dealings with Sula Vineyards or on behalf of Sula Vineyards can have an impact on Sula Vineyards and its reputation. For this reason, they are expected to conduct their businesses in a legal and ethical manner and to adhere to the spirit of the COBC, as well as any applicable contractual obligations, when working for Sula Vineyards.

1.2 How to use the Code of Business Conduct

The COBC is designed to help employees recognize and deal with ethical issues in their work. Sula’s policy is to comply with all applicable laws and regulations, to be committed to conducting business in an ethical manner and to act with integrity in dealing with our customers, suppliers, partners, competitors, employees and other stakeholders.

The COBC is a guide to help whenever you have questions about ethics or if you are faced with an ethical dilemma. COBC may not address all the situations which you may encounter and sometimes, because of the highly complex rules and regulations that govern our business, you may need additional help. In these situations, consult the Sula policies (forming part of the SOP Handbook). They provide more detailed information on seeking help. You can also discuss the matter with your manager, Human Resources (HR) or other designated persons mentioned in the COBC.

1.3 Employee Responsibilities

Sula is made up of hundreds of individuals, each with unique perspectives and aspirations. Though we are all different, we all share an understanding of the importance of “Unyielding Integrity.” Without a reputation for integrity, we would fail with customers, with investors and in our own eyes. We must strive to maintain the highest ethical standards.

In particular:

- Always act in a professional, honest, and ethical manner when acting on behalf of the Company.
- Be familiar with the information contained in the COBC and policies and pay particular attention to the policies that pertain to your job responsibilities.
- Complete all required employee trainings in a timely manner and keep up to date on current standards and expectations.

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Code of Business Conduct & Ethics Policy

SOP #	
Version	1
Approved on	February 23, 2022
Effective from	February 23, 2022

- Promptly report concerns about possible violations of laws, regulations or the COBC to your manager, manager's manager, HR manager, head of the business, any member of Senior Management, any member of the Legal & Compliance Department or the Ombudsperson.
- Cooperate and tell the whole truth when responding to an investigation or audit and never alter or destroy records in response to an investigation, or when an investigation is anticipated.

Remember: No reason, including the desire to meet business goals, should ever be an excuse for violating laws, regulations, the COBC or policies.

1.4 Cooperating with surveys, investigations and inquiries

A "survey", "investigation" or "inquiry" means a thorough search for facts that are hidden or need to be sorted out in a complex situation.

The Company will promptly investigate all credible reports of misconduct. Also, using both internal and external resources, Sula conducts surveys and audits to assess risks and enhance compliance.

All employees are required to cooperate fully and truthfully with designated audit and investigations professionals. Regular purging of documents is in order except if an investigation is in progress and a document preservation or hold notice is issued. Never mislead any investigator and never alter or destroy documents or records in response to an investigation.

- Trained experts will be assigned to conduct the investigation.
- The facts of the case will be uncovered through interviews and document reviews.
- Unless authorized, you should never conduct an investigation yourself.
- Unless authorized do not disclose any information about an investigation.
- Investigators recommend appropriate action, if needed, to management. If action is necessary to correct the situation and prevent a recurrence, the Company will take corrective steps including disciplinary action against the erring employee up to and including dismissal.

Why are we expected to cooperate with investigations and inquiries? I would rather not get involved.

When the Company conducts an investigation, it is because there is the possibility of a breach of our policies or legal requirements. The investigation is necessary to protect individuals, Sula, and, in some cases, the public. If employees do not cooperate it may be impossible to get all the facts and take the right actions. Also, the investigation will help the Company to process corrections which would help in avoiding repeat violations. Withholding information or knowingly giving false or misleading information or sharing information about an investigation is a serious violation of your duties as an employee and could result in disciplinary action.



Code of Business Conduct & Ethics Policy

SOP #	
Version	1
Approved on	February 23, 2022
Effective from	February 23, 2022

1.5 Ethical Leadership

If you are in a leadership position at Sula, you are also expected to meet the following additional responsibilities:

- Lead by example. Managers are expected to exemplify the highest standards of ethical business conduct and to model the “Spirit of Sula.”
- Support implementation of ethics and business conduct programmes and monitor compliance of Sula’s values and ethical business conduct guidelines through such programmes.
- Help create a work environment that focuses on building relationships. Recognize effort and value mutual respect and open communication.
- Communicate to employees and business partners (such as dealers, distributors, agents) about how the COBC and policies apply to their daily work.
- Be proactive. Look for opportunities to discuss and address ethics and ethically challenging situations with team members.
- Create an environment where everyone feels comfortable asking questions and reporting potential violations of the COBC and policies.
- Never ask another or pressure anyone to do something that is in violation of the COBC.
- Be aware of the limits of your authority and do not take any action that exceeds those limits. Delegate authority only where permissible and never delegate authority to any individual who you believe may engage in unlawful conduct or unethical activities.
- If you supervise third parties, ensure that they understand their ethics and compliance.

My business unit sets various goals that we are asked to achieve. Sometimes I find that I can achieve some of the goals only if I violate the COBC. Is this acceptable?


No. While successful businesses set high goals and employees strive to achieve them, you should never violate the COBC or Sula’s policies in a quest to achieve your goals.

I’m a manager and I’m not clear what my obligations are if someone comes to me with an accusation—and what if it involves a senior leader?

No matter who the allegation involves, you must report it without exception. Sula provides several avenues for reporting concerns. If for any reason you are uncomfortable making a report to a particular person, you may refer to the Whistle blower policy.

I’m a manager. If I observe misconduct in an area not under my supervision, am I still required to report the issue?

Though you are chiefly responsible for personnel under your supervision, all Sula personnel are required to report any misconduct they become aware of, and as a leader you are especially obliged to take action. The best approach is to first talk with


	Code of Business Conduct & Ethics Policy	SOP #	
		Version	1
		Approved on	February 23, 2022
		Effective from	February 23, 2022

your manager who oversees the area where the problem is occurring, but if this doesn't work, or isn't feasible, you should use other resources listed in the COBC.

1.6 Make the right choice

Making the right decision is not always easy. There will be times when you will be under pressure or unsure of what to do. Always remember when you have a tough choice to make, you are not alone. Your fellow Sula personnel are available to help and you have other resources to turn to including the COBC.

When faced with a tough ethical decision it may help to pause and ask these questions. If you give a negative answer to even one question, consider a different action or seek help.



- Is it the **right** thing to do? Is it **legal**? Is it consistent with our **policies**?
- Have I considered all the **options**?
- Will my actions be consistent with the **"Spirit of Wipro?"**
- Will I be **comfortable telling others** about my decision?
- Can I honestly say I'd be **proud** of the choice I made?
- What is the possible **impact of my actions** on others, including fellow employees and stakeholders?

1.7 Asking questions and raising concerns

In today's complex business environment, it is inevitable that questions and ethics and compliance concerns will arise. The sooner Sula leadership knows about possible problems, the sooner they can be addressed.

Each one of us is responsible to promptly raise issues or concerns about misconduct. If you become aware of conduct that you believe violates Sula's policies, regulations, or the law, talk to your manager. If this seems inappropriate, or if you don't believe the person to whom you've reported your concern has taken appropriate action, you have several additional options:

- Speak with your manager's manager or any member of Senior Management
- Contact the Legal & Compliance Department or your HR manager.
- Use the Company's Whistle blower policy



Code of Business Conduct & Ethics Policy

SOP #	
Version	1
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Effective from	February 23, 2022

1.8 Preventing Retaliation

Managers must listen openly to concerns about misconduct, respond appropriately, and never retaliate against those who raise issues in good faith.

It is a violation of our policy and contrary to our values to engage in retaliatory acts against any employee who reports wrongdoing of any type, or any employee who testifies, assists or participates in a proceeding, investigation or hearing relating to allegations of misconduct.

Sula takes claims of retaliation seriously. All such claims will be thoroughly investigated and if substantiated, retaliators will be disciplined up to and including termination. If you believe you have been retaliated against, you should report such action through the reporting methods described in the COBC or Whistle blower policy.

1.9 Accountability and discipline

Violating relevant laws, regulations, or the COBC, or expecting or encouraging others to do so, exposes the Company to liability and puts the Company's reputation at risk. If an ethics or compliance problem does occur, you have an obligation to contact one of the resources listed in the COBC so that an effective solution can be developed. Sula will take appropriate disciplinary action including up to termination against any employee, agent, contractor or consultant, whose actions are found to violate these policies or any other policies of Sula.

The Compliance process at Sula has the oversight of the Board of Directors and Audit Committee comprising of Board Members.

2. ACTING IN THE BEST INTEREST OF OUR CUSTOMERS & BUSINESS PARTNERS

The "Spirit of Sula" begins with the intensity to win and the commitment to making our customers successful. Sula personnel know that winning and success are only possible if we consistently act in the best interests of our customers, business partners and the public. When we make their interests our priority, we earn and keep their trust. Annexure B describes the Customer Code of Conduct that is to be shared along with the registration form for all new customers and obtained from existing major customers.


2.1 Customer Relations

Customers purchase our services and products because they trust them. They trust the quality of our services and products, they trust their value, and they trust that we will stand behind what we sell and deliver. We must preserve that trust.

Sula has a fundamental responsibility to ensure that customers have faith in the quality of our services and products. It is the primary responsibility of every employee to make sure that our services and products are consistently of the highest quality.

Our responsibilities

- Each of us must ensure that we follow our rigorous product safety and quality standards.

	Code of Business Conduct & Ethics Policy	SOP #	
		Version	1
		Approved on	February 23, 2022
		Effective from	February 23, 2022

- Any concerns about product safety or quality must be immediately reported. It is the job of every employee to make sure that consumers get what they expect—and pay for.
- Do not create misleading impressions in any advertising, marketing, sales materials or presentations.
- Do not make false or illegal claims about competitors or their services and products.
- Promise what you can deliver and deliver on what you promise.
- If you are in a leadership position at Sula, you have an obligation to monitor the quality of our supply chain to ensure that the products we sell meet all external safety and quality standards, as well as our own high standards.

2.2 Protecting Customer Information

During our business operations, we often have access to personal information related to customers and others. While protecting this information may now be a legal requirement, for us at Sula, data privacy has always been a matter of trust and respect for others.

We respect the personal information of our customers and others. Protecting their privacy is very important to us.


Our responsibilities

- Protect the confidentiality of personal information of current and former customers, as well as job applicants, business partners and customers.
- Access and use personal information solely for legitimate business purposes and only if you have a need to know.
- Return or destroy personal information that is no longer required by you for business reasons in accordance with our document retention policies.
- When sending personal information across borders or to third parties, make sure that such transmissions are for legitimate business reasons and that they comply with local law. Also ensure that the recipient will safeguard the information.
- Sensitive personal information, such as social security numbers, medical records, credit card and bank account numbers require special handling based on local law.
- Do not forward customer or other business information and documents to personal email IDs (such as Gmail or Hotmail).
- Avoid using public file hosting services (such as Dropbox, SkyDrive, iCloud, Amazon CloudDrive) to backup customer or other business information and documents.

2.3 Supplier Selection

Sula's suppliers make significant contributions to our success. To create an environment where our suppliers have an incentive to work with Sula, they must be confident that they will be treated lawfully and in an ethical manner.

Our policy is to select suppliers and make purchases based on need, quality, service, price and other terms and conditions. We select significant suppliers through a

	Code of Business Conduct & Ethics Policy	SOP #	
		Version	1
		Approved on	February 23, 2022
		Effective from	February 23, 2022

competitive bid process where all supplier relationships are conducted by way of appropriate written contracts.

We believe in doing business with suppliers and business partners who embrace and demonstrate high standards of ethical business behaviour and who share our commitment to environmentally sustainable practices and human rights.

Annexure A describes the Vendor Code of Conduct that is to be shared along with the registration form for all new vendors and obtained from existing major vendors.

Our responsibilities

- Be vigilant and watch out for any signs of our business partners violating applicable law or regulations, including local employment, anti-corruption, environmental, health and safety laws.
- Each of us who works with suppliers must make decisions in the best interest of Sula and our customers based on performance criteria, not for any personal benefit or gain.
- Cooperate with audits of suppliers and stop purchasing from those not making real progress towards meeting our standards.
- Respect and protect the confidential and proprietary information of suppliers.
- Document all supplier relationships in appropriate written contracts.
- Disclose any situation that may appear to involve a conflict and remove yourself from making or influencing a purchasing decision.

2.4 Conflicts of Interest

A conflict of interest occurs whenever you have a competing interest that may interfere with your ability to make an objective decision for Sula. Personal involvement including financial interests or dealings with competitors, clients, managers, subordinate employees or peers of Sula that has the potential to affect the employee's ability to exercise good judgment for Sula creates an actual or potential conflict of interest.

Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict. Conflicts of interest can undermine the trust others place in us and damage our reputation.

Some examples of conflicts of interest are:

- Working directly or indirectly either as an officer, employee, consultant or agent for a competitor or client
- Having a direct or indirect financial interest in a competitor or client or managers, or subordinate employees or peers of Sula
- An intimate personal relationship that develops at the workplace between a manager and subordinate
- Engaging in an activity that is in competition with Sula
- Using proprietary or confidential information of Sula for personal gain
- Unauthorized use, or disclosure of information about our customers or business partners for personal advantage

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Code of Business Conduct & Ethics Policy

SOP #	
Version	1
Approved on	February 23, 2022
Effective from	February 23, 2022

- Accepting an expensive gift, entertainment or business courtesy from a supplier or service provider that could potentially result in a conflict of interest in dealing with the supplier or service provider
- Offering or issuing shares of Sula to officials of an existing or prospective customer organization

2.5 Communicating with the public

We are committed to transparency in our disclosures and public communications. Sula needs a clear, consistent voice when providing information to the public and the media. For this reason, it is important that only authorized persons speak on behalf of the Company. Never give the impression that you are speaking on behalf of the Company in any communication that may become public if you are not authorized to do so.

2.6 Social-media and networking


Social media sites and services are a popular method of communication and interaction. Sula supports the rights of its employees to express themselves freely through social networks, blogs, wikis, chat rooms, comment forums, and other online locales. However, employees must remember to be cautious when such activity involves information about or may affect the perception of Sula, its customers and business partners.

All Sula employees are expected to conduct themselves professionally in their online activities and to respect and protect the reputation of Sula, its customers, and business partners. All rules which apply to offline conduct also apply to online comments, postings and other communications. Sula reserves the right to review and monitor the online activities of its employees when they are relevant to the Company, as well as any online communications made using Company resources (computers, phones, tablets, data cards, etc.). If Sula perceives that such online activity is in violation of Company policies, appropriate investigation and action will be taken.

Be especially careful when writing communications that might be published. This includes postings to the internet. If you participate in online forums, blogs, newsgroups, chat rooms, or bulletin boards, never give the impression that you are speaking on behalf of Sula unless you are authorized to do so.

Our responsibilities

- Never give the impression that you are speaking on behalf of Sula unless you are authorized to do so.
- Always identify yourself and be clear, when your online activities are relevant to Sula, that the views you are expressing are your own and do not represent the opinion of Sula.
- Refrain from posting confidential non-public or proprietary information online.

	Code of Business Conduct & Ethics Policy	SOP #	
		Version	1
		Approved on	February 23, 2022
		Effective from	February 23, 2022

3. PROTECTING OUR INFORMATION AND ASSETS

One of the major concerns in the present information technology era is protection of confidential and personal information that is collected and disseminated. When we take action to safeguard confidential information and Company assets that have been entrusted to us, we are delivering on our commitments and living up to the assurances we have made to others.

3.1 Confidential Information

One of our most valuable assets is information. Information that is not generally disclosed and could be helpful to Sula or would be to competitors must be protected. The unauthorized release of confidential information can cause Sula to lose a critical competitive advantage and damage our relationships with customers and others. For these reasons, confidential information must be accessed, stored, and transmitted in a manner consistent with Sula's policies and procedures.

Each of us must be vigilant to safeguard Sula's confidential information as well as third parties' confidential information that is entrusted to us. We must keep it secure, limit access to those who have a need to know in order to do their job and avoid discussion of confidential information in public areas.

“Confidential information” includes but is not limited to the following:

- Client lists, vendor lists, client agreements, and vendor agreements
- Know-how, processes, formulas, models, and flow charts
- Marketing techniques, materials and development plans, price lists, pricing policies, business plans
- Financial information and projections
- Employee files and other information related to human resources and benefits systems and content

Our responsibilities:

- Use and disclose confidential information only for legitimate business purposes.
- Properly label confidential information to indicate how it should be handled, distributed and destroyed.
- Protect intellectual property and confidential information by sharing it only with authorized parties.
- Be careful not to send confidential information to unattended fax machines or printers.

3.2 Protecting personal information and the privacy of employees

In recent years, individuals, companies and governments have grown increasingly concerned about the privacy and security of personal information. In many countries as a result, laws protecting the privacy of personal information and how it may be collected, shared and used are becoming more common. We have a responsibility to protect the confidential and personal information of our fellow Sula personnel and others.

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Code of Business Conduct & Ethics Policy

SOP #	
Version	1
Approved on	February 23, 2022
Effective from	February 23, 2022

Our responsibilities

- All employees and contractors are accountable for protecting personal information and for handling it securely.
- Collect personal information only for legitimate business purposes and keep it only as long as necessary.
- Take adequate precautions to safeguard personal information when collecting, processing, storing and transferring it.
- Only share personal information with other employees who have a legitimate need to know and take steps to ensure that they understand the importance of properly handling the data you share with them.
- When we use third parties to provide services for us, make sure that they understand the importance we place on privacy and that they must uphold our standards.

3.3 Business Records and Internal Controls

Investors, government officials and others need to be able to rely on the accuracy and completeness of our business records. Accurate information is also essential within the Company so that we can make good decisions. Inaccurate records can adversely impact Sula in many ways, including weakening of our internal controls over financial reporting.

Sula is committed to making full, fair, accurate, timely and understandable disclosure on all material aspects of our business including periodic financial reports that are filed with or submitted to regulatory authorities.

Employees with a role in the preparation of our public, financial and regulatory disclosures have a special responsibility in this area, but all of us contribute to the process of recording business results and maintaining documents. Each of us is responsible for helping to ensure the information we record is accurate, complete and maintained consistently with our system of internal controls:

- Never make false claims on an expense report or time sheet.
- Always be accurate, complete and truthful when submitting financial, quality or safety results
- Do not record false sales or record them early or late, understate or overstate known liabilities and assets, or defer recording items that should be expensed.
- Make sure that financial entries are clear and complete and do not hide or disguise the true nature of any transaction.
- Do not maintain undisclosed or unrecorded funds, assets or liabilities.
- Create financial records that conform both to applicable standards of accounting and reporting and to Sula's accounting policies and procedures.
- Do not sign documents including contracts without authority. Sign only that which you are authorized to sign and that you believe are accurate and truthful.
- Do not record or approve false or misleading entries, unrecorded funds or assets, or payments without appropriate supporting documentation.



Code of Business Conduct & Ethics Policy

SOP #	
Version	1
Approved on	February 23, 2022
Effective from	February 23, 2022

3.4 Safeguarding Company Assets

To best serve our customers and shareholders, we all have a responsibility to use Sula's assets and resources wisely and with care. All employees are responsible for using good judgment to safeguard the tangible and intangible assets of Sula, and to ensure that our assets are not misused, damaged, lost, stolen or wasted.

Company assets include Sula's physical facilities, property and equipment, electronic communication devices, intellectual property, confidential information, files and documents, as well as inventory, computer networks, and supplies.

Our responsibilities

- Use Sula assets for legitimate business purposes.
- Personal use of Company assets should be incidental and kept to a minimum and should have no adverse impact on productivity and the work environment.
- Do not use Sula equipment or systems, including email and the internet, to download, create, store or send content that others might find offensive.
- Do not share passwords.
- Comply with Sula's password security requirements such as periodically changing access passwords.
- Report any suspicions you may have concerning theft, embezzlement, or misappropriation of any Company property.

4. FOLLOWING THE LETTER AND THE SPIRIT OF LAWS AND REGULATIONS

Compliance with laws, regulations and contractual obligations is the bedrock on which organizations are built. Compliance with the highest order of governance and ethics has been a hallmark of Sula and will continue to be non-negotiable. We pride ourselves in upholding the "Spirit of Sula" and we consistently demonstrate our values in our actions.


4.1 Insider Trading

Confidential information is not to be used for personal benefit at the stock market. Each of us is prohibited from passing information on to others who then trade ("tipping") on the basis of material information before it is made publicly available to ordinary investors.

I'm not sure what kind of information is covered by the term "material Information." What does it include?

"Material Information" includes any information that a reasonable investor would consider important when deciding whether to buy, sell or hold a security. This can include news about acquisitions, financial results, important management changes, commencement or termination of customer contracts, as well as news about the financial performance of a company.

I'm unclear about the term "unpublished price sensitive information." What does this mean?

	Code of Business Conduct & Ethics Policy	SOP #	
		Version	1
		Approved on	February 23, 2022
		Effective from	February 23, 2022

“Unpublished price sensitive information” is information which relates directly or indirectly to the company, which if published or publicized is likely to materially affect the price of securities of the Company.

Our responsibilities

- Do not buy or sell securities of Sula on the basis of material non-public information.
- Employees having knowledge of or access to material non-public information will be “insiders” who have an obligation not to misuse such information.
- No employee falling under the category of “insider” should engage in “short sales,” or trade in puts, calls or other options or derivatives on Sula’s stock.
- Be careful when others request confidential information about Sula or Sula’s business partners. Even casual conversations could be viewed as illegal “tipping” of inside information.

5. PERFORMANCE THROUGH TEAMWORK AND RESPECT

We employ individuals and we work with business partners who represent a rich variety of backgrounds, skills and cultures. Combining this wealth of resources creates the diverse and collaborative teams that consistently drive our achievements.

To attract and retain talented and dynamic individuals, it is vital to have a supportive work environment, based on mutual respect. Sula always encourages and promotes favourable employment conditions and positive relationships between employees and managers, and we encourage open communication and employee development.

5.1 Diversity and Non-Discrimination

Sula’s greatest asset is our employees. We believe that every employee deserves the opportunity to work and grow in a congenial environment where everyone can work without any inhibition, and free of discrimination and harassment.

We are committed to attracting, retaining and developing the highest quality and most dedicated work force possible in today’s market. We understand that when diversity is embraced, we benefit from the creativity, varied perspectives and increased innovation.

Sula offers equality of opportunity to all employees and does not engage in or support discrimination in hiring, compensation, access to training, promotion, termination or retirement based on ethnic and national origin, race, caste, religion, disability, age, gender, creed, marital status, gender identity, gender expression, sexual orientation, political orientation, protected veteran status, or any other characteristic protected by law. Sula does not impose any fees or charges from employees we hire.

Sula hires and promotes people on the basis of their qualifications, performance and abilities, and is determined to provide a work environment free of any form of discrimination.



Code of Business Conduct & Ethics Policy

SOP #	
Version	1
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5.2 Harassment free workplace

Sula is committed to maintaining a workplace where each employee's personal dignity is respected and protected from offensive or threatening behaviour including violence.

At Sula, we believe that everyone has the right to work in an environment that is free from intimidation, harassment and abuse. We understand that harassment and abuse undermines the integrity of employment relationships and can cause serious harm to productivity, efficiency and a harmonious workplace.

For these reasons, Sula does not tolerate verbal or physical conduct by any employee that harasses another, disrupts another's work performance, or creates an intimidating, offensive, abusive or hostile work environment. This includes such behaviour directed towards third parties during the course of conducting Sula business.


5.3 Safe and healthy work environment

Sula promotes employee well-being as a strategic value and fundamental component of its success, and we define well-being as more than what is traditionally thought of as occupational health and safety.

Sula takes appropriate measures to prevent workplace injuries and ill health and to provide employees with a safe and healthy working environment by considering evolving industry practices and societal standards of care.

Sula is proactive and actively assesses and manages the health and safety impact, and possible risks associated with our existing activities as well as when planning for new activities, production of services and products.

We are committed to providing a safe and healthy workplace for colleagues and visitors to our facilities.

	Code of Business Conduct & Ethics Policy	SOP #	
		Version	1
		Approved on	February 23, 2022
		Effective from	February 23, 2022

6. Annexure A – Vendor Code of Conduct

While conducting business with or on behalf of Sula, all vendors and representatives are expected to conduct their business interactions and activities with integrity and in compliance with the applicable laws and regulations of their respective countries.

In addition to the obligations under the vendor’s agreement with Sula, all vendors and representatives are required to follow our ethical standards, which include expected conduct in the areas of regulatory compliance, business practices, and employment.

A. Expected Regulatory Compliance

- Conduct business in compliance with antitrust and fair competition laws.
- Comply with the anti-corruption laws of the countries in which they do business.
- Not make any direct or indirect payments, proposed payments, facilitating payments, or offer something of value to another person or someone who is an employee of the government or a public agency with the intent to influence him or her.


B. Expected Business Practice

- Honestly and accurately record and report all business information.
- Protect and responsibly use the physical and intellectual property of Sula.
- Use good judgment and moderation when offering gifts or entertainment to Sula associates in line with the Sula Gifts & Hospitality Policy.
- Avoid an actual conflict of interest or even the appearance of a conflict of interest.
- Create, retain and dispose of business records in full compliance with all applicable legal and regulatory requirements.

Authorised Signatory

Name:

Designation:

	Code of Business Conduct & Ethics Policy	SOP #	
		Version	1
		Approved on	February 23, 2022
		Effective from	February 23, 2022

7. Annexure B – Customer Code of Conduct

While conducting business with or on behalf of Sula, all customers and representatives are expected to conduct their business interactions and activities with integrity and in compliance with the applicable laws and regulations of their respective countries.

In addition to the obligations under the customer’s agreement with Sula, all customers and representatives are required to follow our ethical standards, which include expected conduct in the areas of regulatory compliance, business practices, and employment.

A. Expected Regulatory Compliance

- Conduct business in compliance with antitrust and fair competition laws.
- Comply with the anti-corruption laws of the countries in which they do business.
- Not make any direct or indirect payments, proposed payments, facilitating payments, or offer something of value to another person or someone who is an employee of the government or a public agency with the intent to influence him or her.

B. Expected Business Practice

- Honestly and accurately record and report all business information.
- Protect and responsibly use the physical and intellectual property of Sula.
- Use good judgment and moderation when receiving gifts or entertainment from Sula associates in line with the Sula Gifts & Hospitality Policy.
- Avoid an actual conflict of interest or even the appearance of a conflict of interest.
- Create, retain and dispose of business records in full compliance with all applicable legal and regulatory requirements.

Authorised Signatory

Name:

Designation: