

**CODE OF CONDUCT
AND ETHICS**

**CODE OF CONDUCT
AND ETHICS**

CODE OF CONDUCT AND ETHICS

FUNDAMENTAL

We strive to exercise the highest standards of ethics and conduct in our personal and business relations with ensuring compliance to legal framework, fairness, integrity, honesty and environmental impacts of our acts and the interests of stakeholders.

INTRODUCTION

This document sets out BPC Code of Conduct & Ethics, hereto referred as “BPC Code”. The BPC Code addresses the BPC’s business principles related to compliance to laws and standards of business conduct and ethics.

APPLICABILITY OF CODE

BPC Code applies to all employees. Each one at BPC is expected to behave according to the principles contained in the BPC Code and is expected to adhere to the standards and restrictions set forth in this code; avoid and discourage actions that would imply company activities in violation to the code.

All at BPC must promote and support BPC Code in day-to-day business activities.

We encourage consultation and advice as appropriate from the resources available in application of the BPC Code.

Breach of BPC Code may result in severe disciplinary action such as suspension or termination.

ACCOUNTABILITY

Every BPC Code addressee shall be accountable for the full compliance with this Code with respect to the matters within his/her control.

THE “BPC CODE”

1. Abide by the applicable laws & regulations governing our business.

- Comply with applicable laws and government regulations.
- Do business only with suppliers, clients and partners that comply with legal requirements.
- Screen transactions against applicable rules.

2. Be honest, fair and trustworthy in all business activities and relationship.

- Uphold trust placed in us as professionals and ensure delivery of quality services that reflect professional capabilities.
- Provide competitive and equal opportunity to suppliers and contractors.
- Abide by special contract clauses agreed with any agency.
- Do not make any unauthorized substitutions after entering into contract without the written approval of the authorized representative of the party.
- Reject inappropriate pressure from clients or others.
- Protect proprietary and confidential information related to company or employees.
- Be truthful and maintain accurate records.
- Adhere to internal control system, company’s policies, principles and business processes.

3. Avoid conflicts of interest between work and personal affairs.

- Use and process personal data for legitimate business purpose only.

- Do not use confidential information for personal gains.
- Do not divulge or provide “tip” on any price sensitive information to anyone including to any friends and relatives.
- Do not engage in activities that adversely affect company’s interest or line of business.
- Do not use company property or opportunities encountered through use of company property or by virtue of association with the company or position for self interest or to any third party.
- Self or members of immediate family must not compete against the company or use their position to influence or derive improper benefit for themselves or others.
- Do not accept or give extravagant gifts or entertainment from or to companies doing business with the BPC or group companies.
- Do not accept fees or felicitation in exchange of services provided on behalf of the company.

4. Foster an atmosphere in which fair employment practices are extended to every member of BPC.

- Employment decisions must be based on job requirement, qualification and merit without regard to race, religion, nationality, sex, age, disability or other characteristic protected by law.
- Provide a work environment free of harassment.
- Respect privacy rights of employees by protecting personal data. While seeking to maintain employee privacy, BPC reserves the right to monitor use of company property including PCs, emails, phones, proprietary information etc applicable as per law.

- Encourage & support professional development of employees and promote individual achievements and continuous learning in pursuit of company's objectives and goals.
- 5. Strive to create a safe workplace.**
 - Create and maintain safe working environment.
 - Comply with occupational health & safety rules and regulations.
 - Manage risks to address the security of employees, facilities, information, assets and business continuity.
- 6. Strive to protect the environment.**
 - Comply with all applicable environmental laws and regulations.
 - Prevent pollution and conserve water & energy.
- 7. Corporate Social Citizenship**
 - Maintain good relationship with neighbors and communities where we do business.
 - Account for managing social impacts of our business activities in all business proposals.
- 8. Practice a culture where ethical conduct is exemplified and valued by all employees.**
 - Identify and protect intellectual property.
 - Respect copyrighted materials and other protected intellectual property of others.
 - Follow BPC accounting procedures and ensure accurate accounting and financial reporting.
 - Maintain accurate and updated accounts to appropriately

reflect all business transaction transparently.

- Reject all unethical or illegal business practices.
- Remain committed to open and honest communication.
- Be responsible for keeping our professional knowledge up-to-date and sharing best practices.
- Deliver and welcome feedback on performance and conduct regularly, candidly and constructively.
- Nurture integrity, respect and teamwork.
- Build relationship with each other based on shared trust and confidence.

MISCELLANEOUS

No waiver of any provision of this Code shall be valid unless provided in writing by the Chairperson of the Audit Committee in advance.

Consultation and advice as appropriate from the resources available in application of the BPC Code if necessary is encouraged.

Disciplinary action for breach of The BPC Code shall be determined by Board of Directors for Directors and Chief Executive Officer and by the Audit Committee for other addressee.

The provisions of this Code can be amended and supplemented from time to time by resolution of the Board of Directors of BPC.

COMMITMENT

Every code of conduct and ethics addressee shall submit their acknowledgement and commitment on taking office.

Acknowledgement for receipt and acceptance of “BPC Code”:

I acknowledge that I have received and understood the BPC code and commit to abide by the code and promote BPC Code in day-to-day conduct and all business activities.

I further acknowledge that breach of “BPC Code” may result in severe disciplinary action such as suspension or termination.

Initials...

Name:

Position:

Place:

Date: