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Document History

Version No.	Published Date	Description of Change
1.0	12 March 2025	New Document approved by the Ethics Committee
2.0	16 February 2026	New clause added to refrain partners from offering undeclared gifts, meals, entertainment and hospitality to Altius employees

CODE OF CONDUCT FOR BUSINESS ASSOCIATES AND PARTNERS

Code of Conduct for Business Associates and Partners

The Code of Conduct (“Code”) for Business Associates and Partners sets out the fundamental values and integrity in business conduct that Altius Group (herein referred as “Altius”) expects its Business Associates and Partners to uphold always in the business relationships. The Code contains rules and guidelines with which Business Associates and Partners must comply. Business Associates and Partners are required to maintain the highest standards of honesty, objectivity and integrity in their personal and business conduct and refrain from any illegal, dishonest, unauthorized, or unethical conduct at all times and not merely while providing their services to Altius.

The Code deals with aspects of business conduct and practices as well as the consequences of breach of the Code of Conduct.

“Altius Group” and/ or “Altius” shall mean and include Altius Telecom Infrastructure Trust (“the InvIT”), Data Link Investment Manager Private Limited, Summit Digital Infrastructure Limited, Elevar Digital Private Limited, Crest Digital Private Limited, Crest Virtual Networks Private Limited, Roam Digital Private Limited and such other entities as may be acquired by Altius as its Special Purpose Vehicle in future.

Altius Business Associates and Partners include all entities and individuals supplying products, equipment, materials, or services to Altius under any contract, agreement or any other arrangement with Altius including their agents, representatives, and employees. These associates represent Altius in customer interactions and perform essential operations, requiring them to uphold high values, legal and ethical standards. Altius aims to build long-term relationships based on mutual trust and cooperation with its Business Associates and Partners.

The Code sets basic requirements for business relationships with stakeholders and the environment. Altius’s employees and managers commit to honesty, integrity, and legal compliance, adhering to the Code of Conduct. Business partners must uphold similar ethical standards and have supporting policies and processes within their supply chain and ecosystem.

Business Associates and Partners shall ensure that the Code and other relevant policies, guidelines, processes and information’s should be cascaded to their employees who work with and on behalf of Altius.

In case of any doubt, confusion, clarification or for interpretation of any clause or clauses of the Code, the Business Associate or Partner should contact respective Altius representatives.

Compliance with Laws and Regulations

1. Legal Compliance

We at Altius conduct our business responsibly in compliance of the applicable law and regulations and the Business Associates and Partners associated with us need to comply with all applicable laws and regulations in every jurisdiction where they operate.

ALTIUS expects its all-Business Associates and Partners to:

- Understand and comply with applicable laws and regulations.
- Maintain all applicable licenses, permits, registrations and other regulatory authorizations and requirements necessary to conduct the activities for which they have been appointed by ALTIUS.

2. Responsible Labour Practices

The Business Associates and Partners will be committed to ensure compliance, uphold the human rights of workers, and treat them with dignity and respect in accordance with local, national, and international human rights standards. This applies to all workers, including temporary, migrant, student, contract, direct or indirect employees, and any other type of worker working through contractors / sub-contractors engaged by the Business Associates and Partners.

ALTIUS expects its Business Associates and Partners to respect the fundamental employment rights set out within the place we are operating and follow international conventions of the United Nations (UN) and the International Labor Organization (ILO).

Business Associates and Partners will notify ALTIUS in writing of any conflict with respect to compliance of local, national, or international law or any conflict in these requirements.

2.1 Prohibition of Forced Labour

We expect our Business Associates and Partners to:

- Neither use nor contribute to forced, bonded labour (including debt bondage) or indentured labour, involuntary prison labour, slavery, servitude, or trafficking of persons.
- Implement proper and appropriate control and check mechanisms in their own processes of hiring.
- Ensure all work must be voluntary, and workers shall be free to leave work at any time or terminate their employment and are provided with basic amenities like access to toilets, drinking water, etc.
- Ensure workers are hired in a transparent and fair manner with no malpractice of charging fees for the job.
- Provide training as necessary to ensure personnel have the required skills, knowledge and certifications to perform the assigned work confirming the guidelines issued by Altius from time to time.
- Altius will not tolerate physically abusive disciplinary practices.

2.2 Prohibition of Child Labour

We expect our Business Associates and Partners

- Shall not employ child labour unless this is part of a government-authorized job training or apprenticeship program that would clearly be beneficial to the persons participating so as long as these programs comply with all applicable laws and regulations.
- Shall not employ child labour - any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greater.

- Employ no manpower under the age of 18 (Young Labour) for hazardous work that is likely to jeopardize their health or safety, including night shifts and overtime.
- Ensure while appointing manpower, you will verify their date of birth and document/certificates and put them in the personnel file.

2.3 Non-Discrimination and Harassment

We expect our Business Associates and Partners to:

- Provide a workplace free from discrimination and harassment, whether on the basis of gender, age, disability, ethnicity or cultural affiliation, sexual orientation, belief, educational background, or any other basis prohibited by applicable law.
- Ensure equal rights including salary, benefits, discipline, termination or retirement and decision not be linked based on race, skin, colour, religion, age, nationality, social or ethnic origin, sexual orientation, gender, marital status, political opinion, disability, or any other category protected by law.
- Ensure and promote equal opportunities and treat each labour /employee with dignity and respect, and will not use corporal punishment, language, threats of violence or other forms of physical, sexual, mental, or physical coercion or verbal abuse, exploitative, abuse or intimidation of labours.
- Ensure internal governance mechanism with respect to non-discrimination and harassment in any form and establish guidelines for fair and transparent approach.
- Altius endeavor is to create harassment free workplace and culture, and a business environment based on equal opportunities, mutual respect and inclusion and has zero tolerance policy towards any violation by the Business partner.

2.4 Working Hours, Wage and Benefits

We expect our Business Associates and Partners:

- To comply with all applicable wage and related laws and regulations, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation and provide legally mandated benefits.
- To also provide for the periodic holidays with wages as prescribed by the local law and regulations.
- Ensure for each paid month, labours shall be provided with a timely and understandable wage statement.
- Ensures the hiring of temporary, dispatch and outsourced labour shall be in accordance with local law as prescribed.

3. Workplace Health and Safety

We expect our Business Associates and Partners to:

- Provide and maintain a clean, safe, and healthy working environment that complies with applicable laws, directives, regulations, and minimizes occupational hazards. The minimum working conditions should include reasonable access to sanitary facilities, fire exits, potable water, adequate lighting, and ventilation. Any Partner-provided residential spaces must be hygienic, ventilated, and safe.

- Provide a safe working environment that supports safety measures and practices and minimizes exposure to health risks. The following aspects needs to be covered –
- Occupational safety (take measures to prevent accidents on building sites, in plant and in projects)
 - Emergency preparedness to the best extent possible (implementation of emergency plans and response procedures, including labour training and drills)
 - Eliminate unsafe and dangerous conditions immediately.
- Control hazards and take the best possible measure against accidents and occupational diseases - assessing hazards and effects of various activities, products, and services.
- Clear communication of health and safety information.
 - Comply with all applicable safety and health laws and regulations – locally and in the country in which they operate.
 - Implement procedures designed to prevent injury to labours, including providing adequate work training and personal protective equipment as appropriate and safeguards against infectious disease.
 - Maintain reporting systems for labours to document health and safety hazards and incidents.
 - Promptly inform Altius of any material health and safety incidents that occur while performing services or delivering goods to Altius .
- Altius is committed to conduct audit from time to time or as the need may be.

4.Environment, Social and Governance (“ESG”)

Altius’ Environmental, Social and Governance (“ESG”) principles are embedded throughout its operations to ensure that its business model will be sustainable.

As such, we encourage our Business Associates and Partners to:

- Conduct business in an environmentally friendly and responsible manner.
- Have strategies to reduce and minimize the environmental impact of all their operations in the short term and planning for long term sustainability.
- Comply with all applicable environmental and related laws and regulations, including permit and reporting requirements.
- Avoid pollution and prevent wasteful use of natural resources, cost effective methods of improving energy efficiency.
- Strive to reduce the impacts of their activities and products on the environment.
- Have appropriate policies and programs to maintain good, open, and honest relationship with governments, local bodies, communities, and other stakeholders to improve the educational, cultural, economic, and social well-being of the communities in which they live and serve.
- Use resources responsibly and conduct operations with the aim of protecting and preserving the environment. As appropriate, Business Associates and Partners’ facilities must have suitable plans for notifying local authorities in the case of accidental discharge or release of hazardous materials or any other environmental emergency.

5.Business Integrity, Ethics and Anticorruption

Altius has **zero-tolerance approach towards illegal activities including, bribery and corruption, money laundering, tax evasion and sanctions and export control violations** and neither approves nor involves in or facilitates any illegal activities as integral to its business.

Altius has in place an Anti-Bribery and Anti-Corruption Policy and Program designed to prevent employees and Business Associates and Partners from paying or receiving bribes or undertaking corrupt practices and activities. We expect our Business Associates and Partners to share these principles and uphold our standards and to develop and maintain policies and programs as appropriate to ensure that their representatives understand and adhere to these standards.

We expect our Business Associates and Partners to:

- Comply with all applicable anti-bribery, anti-corruption, and anti-money laundering laws.
- Comply with all applicable competition and antitrust laws.
- Ensure the highest standards of integrity and business values are to be upheld in all business interactions.
- Adopt a zero-tolerance policy and prohibit any or all forms of bribery, corruption, extortion and embezzlement and other questionable / inappropriate business practices.
- Refrain from offering or making any payments of money or anything of value, commitment, directly or indirectly to any public officials, political parties, candidates for public office, charities or other business-related parties that could be considered to improperly influence any act or decision of such official or person for the purpose of promoting the business interests, in any respect, or otherwise in violation of applicable law. This includes prohibition on any kind of facilitation payments and/or liaison fees.
- Refrain from entering into business relationships or transactions with personnel in an individual capacity or in any way that could create a conflict of interest or impropriety apparent or confirmed.
- Business Associates and Partners must refrain from offering any items of value, or hospitality with lavish meals, gifts, and entertainment to Altius employees. Where business courtesy is necessary, any such invitation or gift requires prior written authorization from the Altius Risk Team via request sent to teamrisk@altiusinfra.com.
- Disclose to Altius and avoid or appropriately manage any actual or potential conflicts of interest arising due to either personal or business relationships.
- Not knowingly facilitates a person committing to the fraudulent evasion of tax.
- Promptly apprise Altius in the event either they or any related company (including parent companies) have been: (i) named or listed as the target of any economic, trade, or transactional sanctions imposed by any governmental agency; or (ii) otherwise banned or blocked pursuant to any laws that are enforced or administered by any governmental agency.
- Comply with all applicable trade restrictions and sanctions laws, and not knowingly employ or do business with anyone suspected of being connected with criminal or terrorist activities or who is the subject of applicable trade sanctions.
- Use accounts or funds for legitimate purposes only and make payments only if they are lawful and have legitimate purposes.
- Ensure payments with proper documentation.
- Ensure that all meetings with Altius employees are conducted only at designated business premises and not at informal or unauthorized locations
- Not to engage in doing anything with any other third party/ contractor to do anything that you yourself are prohibited from doing as mentioned in above points.

6. Disclosure of Information

We expect our Business Associates and Partners to Record and disclose information on their business activities, structure, health, safety and environmental practices, financial situation, and business performance in accordance with applicable laws, rules, and regulations.

7. Confidentiality

We expect our Business Associates and Partners to Protect personal, proprietary, and confidential information, including information that they access, receive or process on behalf of Altius. Business Associates and Partners must adopt and maintain processes to provide reasonable protection for such information with a reasonable degree of care that would apply to Business Associates and Partner's own confidential information.

8. Protection of Intellectual Property

We expect our Business Associates and Partners to:

- Respect intellectual property rights of others; safeguard customer information; and transfer of technology and know-how must be done in a manner that protects intellectual property rights.
- Implement and maintain security safeguards, including administrative, physical, and technical safeguards designed to protect its information systems from unauthorized access, and shall promptly inform Altius Companies if it believes its systems have been compromised in a manner that could result in harm to Altius Companies.
- Must use Altius confidential information, data, trade information, copyrights, and trademarks only in a manner that is permitted under the agreed contracts only.
- Comply with all applicable laws, rules and regulations governing the protection, use, and disclosure of Altius proprietary, confidential, and personal information.

9. Data Protection and Information Security

We expect our Business Associates and Partners to:

- Maintain internal policies and procedures reasonably designed to protect data provided by Altius or obtained by the Business Associates and Partners on behalf of Altius.
- To comply with all applicable privacy, data protection and information security laws including those relating to data protection, privacy, security or the processing of personal data and information ("Digital Personal Data Protection Act 2023 / Global Data Protection Laws") and not take any action that would prevent Altius from complying with its obligations thereunder.
- To comply with all regulatory and judicial requirements regarding the collection, storage, processing, transmission, or disclosure of Altius data.

- Must take consent from Altius before engaging a new third party / sub-contractor to process Altius Data.
- Ensure any Information including but not limited to drawing/design or any modification suggested by Altius shall be sole property of Altius and cannot be used in any supply or services than Altius.
- Keep in strict confidence all communications, technical or commercial know-how, specifications, inventions, processes, or initiatives, which are of a confidential nature as have been disclosed by Altius to the Business Associates and Partner or its personnel and any other confidential information concerning Altius business or its products which they may obtain.
- Provide services where Business Associates and Partners have access to Altius Confidential Information, in accordance with an industry recognized information security framework and information security policy. Upon request, Business Associates and Partners will provide a copy of their information security policy.
- Maintain appropriate administrative, technical, organization and physical safeguards to preserve and protect Altius Confidential Information.
- Notify Altius immediately of any privacy breaches, security breaches or loss of Confidential Information related to Altius.

10. Management Support and Commitment

10.1 Risk Assessment and Management

We encourage our Business Partner & Associates to:

- Strive towards the continual identification of environment, health, safety, business ethics, labor, human rights, and legal compliance risks associated with their operations.
- Conduct periodic self-evaluations to ensure that they are, along with subcontractors and their next tier Third parties, complying with these Standards.
- To follow and execute the ongoing risk assessment to determine the relative significance of each risk and implement appropriate procedures/controls to ensure that these risks are mitigated.
- Notify immediately of the envisaged risk and will take responsibility and accountability to mitigate the same.

10.2 Documents and Records

We expect our Business Associates and Partners to:

- Have processes to identify, monitor, and understand applicable laws and regulations and the additional requirements imposed by these Standards.
- Obtain, maintain, and keep current a valid business license / any other certifications as required by applicable laws and regulations.

11. Business Continuity and Disaster Recovery

We expect our Business Associates and Partners to have adequate business continuity and disaster recovery plans in place designed in accordance with industry standards to maintain continuity of services to a reasonable degree after the occurrence of an event that results in an interruption or suspension of services. Upon request by Altius, Vendors will disclose in reasonable detail and discuss the elements of their business continuity plans.

12. Insider Trading

Information provided to Business Associates and Partners by Altius may include material non-public information (“MNPI”) that is not available to the public and that could influence an investor’s decision to buy or sell securities. Our Business Associates and Partners agree not to, and not permit their employees, contractors and agents who are in possession of Altius MNPI to (a) buy or sell any securities based on MNPI; or (b) recommend that any other person buy or sell any securities while in possession of MNPI.

If Business Associates and Partners have any employees, contractors or agents located physically on-site at Altius office or facility, they may be subject to additional trading restrictions.

13. Insurance

Business Associates and Partners will obtain and maintain reasonable insurance coverage for staff, employees and direct and indirect labours as required to provide services to Altius as per statutory guidelines. Business Associates and Partners will provide documents to Altius as proof of insurance coverage upon request.

14. No Publicity

Business Associates and Partners will not use any of Altius name, marks, or other proprietary trademarks in any public or promotional materials without the prior written consent of Altius.

15. Contracting

Altius Supply Chain is responsible for Business Associates and Partners evaluation and selection, awarding contracts and Purchase Order and entering into agreement for Products, Services, equipment, software, and consumable. Altius has “No PR/PO No Work Policy.” Partners should not begin execution until a formal Purchase order or contract is received. Business Associates and Partners performing a service or supplying products without the proper authorization would do so at their own cost and risk.

16. Business Associates and Partner Disengagement –

Altius reserves the right to cancel all orders and/or contracts of a Business Associates and Partner in cases where there is an unethical practice used, code of conduct violation, partner bankruptcy or insolvency, ownership transfer and/or any other reason deemed fit for disengagement. Altius would follow a structured approach for disengagement to ensure smooth transitioning where separation becomes inevitable.

17. Breach of the Code of Conduct

Altius may take appropriate actions, including terminating the business relationship and cancelling contracts, if a Business Associate and Partner compromise the Code and negatively impacts Altius’ reputation. Regulated professionals among Business Associates and Partners may face inquiries or investigations by their professional bodies for breaches of conduct and cannot function as Business Associates and Partners until these issues are

resolved. If Altius concludes that a Business Associates and Partner is unfit to continue in their role due to violations of the Code, Altius will review the business relationship with that Business Associate and Partner. Investigations or inquiries will be conducted following the principles of natural justice, as detailed in the Code.

18. Compliance with the Code of Conduct

Business Associates and Partners will ensure that their personnel, contractors, agents, and other representatives understand and comply with this Code. We expect our Business Associates and Partners to share our commitment to the minimum standards and principles in this Code and to have their own internal policies and procedures in place to support and monitor their compliance with such commitment. Altius reserves the right to monitor, assess and audit all Business Associates and Partners according to this Code. Where incorporated into any contract, this Code will survive the contractual term.

Altius expects that Business Associates and Partners to Promptly notify Altius as soon as it becomes aware of any actual or suspected breach of this Code.

The contents of this Code are additional to and do not in any way affect or prejudice any of Altius rights and remedies under the relevant agreements with each Business Associates and Partner, if any.

The failure or omission by Altius to insist upon strict performance and compliance with any of the provisions of this Code at any time shall in no way constitute a waiver of its rights.

For further information on reporting, see Section 19, Reporting Hotline.

Cooperate with Altius to ensure its compliance with applicable laws and regulations. This includes responding to Altius reasonable requests for information, maintaining adequate documentation of compliance programs and obtaining compliance certifications as reasonably requested.

In the event of any conflict or ambiguity between any provision of this Code and the provisions of any relevant agreement with any Business Associates and Partner, the provisions of that agreement will prevail.

19. Reporting Hotline

Business Associates and Partners must report any violations or suspected violations of the Code to Altius. Reports must be made in good faith, with a reasonable basis, and should not be influenced by personal bias or conjecture.

Altius maintains a Reporting Hotline for its employees, Business Associates and Partners, and various other interested parties to anonymously report any concerns or raise any issues free of discrimination, retaliation or harassment pertaining to (i) accounting, auditing or other financial reporting irregularities; (ii) unethical business conduct (including safety, environment, conflicts of interest, theft and fraud); or (iii) violations of applicable law.

The Altius Ethics Hotline may be accessed by telephone (toll free) at the numbers listed below or by submitting an anonymous report online at www.altius.ethicshelpline.in. Altius will investigate all reports in compliance with applicable laws or as it otherwise deems necessary.

Toll free number – 1800 102 6843

Email: altius@ethicshelpline.in

Website: www.altius.ethicshelpline.in

Address: P.O Box No. 71, DLF Phase 1, Qutub Enclave, Gurgaon – 122002, Haryana, India

There will be an Annual Compliance / Declaration Certification process to be signed by each Business Associates and Partners of having read, understood, and complied to the Business Partners' Code of Conduct. Failure to submit the declaration on time may result in temporary discontinuation of services.

Changes to Code of Conduct

Ethics Committee or Head Risk with the approval of the Ethics Committee of Altius reserves the right to update, modify or change the requirements of the Altius Business Partners' Code of Conduct and all Business Associates and Partners shall accept such changes and act accordingly.

Nothing contained in any documents issued by the Business Associates and Partners shall be deemed to modify or amend any part of this Code.

Important Note:

Nothing contained herein shall be construed or applied as a binding interpretation or definition of the law or industry practices.

Nothing in this Code is intended to replace or supersede local laws, work rules, legislation, or Standard Operating Procedures.

BUSINESS - CODE OF CONDUCT ACKNOWLEDGEMENT FORM

Declaration

(On Company Letter Head)

It is mandatory for each Business Associates and Partners associated with ALTIUS to sign this Code of Conduct declaration. "The Service Provider/Supplier/Consultant hereby agree to comply with all applicable Central and State laws in India in the performance of their obligations under the Agreement. _____ (Business Associates and Partners Name) acknowledges that we shall I abide by all the provisions of Business Code of Conduct and be responsible to comply with all laws includes those relating to corruption and bribery in India. _____ (Business Associates and Partners Name) agrees to adopt and implement policies, procedures, and training as necessary to ensure that its officers, employees, labours, and other Business Associates and Partners (contractors / sub-contractors) comply with all applicable anti-bribery and anti- corruption laws, regulations, and policies and to do all other act or process for necessary compliance of this standards of Conducts.

We understand our obligations as set forth in the Code and have a shared duty to prevent, correct and, if necessary, report suspected Code violations.

_____ (Business Associates and Partners Name) certifies to have fully read the ALTIUS Business Code of Conduct attached above and understood the complete requirement of this Code, we hereby commit to abide by this Code and to fully comply with all of its principles.

We also certify that the person signing this Code is duly authorized by our firm or the company to sign and accept this document on its behalf.

For _____

(Business Associates and Partners Name)

Business Associates and Partners Stamp and Signature (Authorized Signatory)

**MSME Declaration
(On Company Letter Head)**

To,
M/s ----- (Name of the Altius Company)

1. We, (_____ (“the Company”), registered under the Companies Act 1956/2013, having registered office at _____ hereby do declare that provisions of the Micro, Small and Medium Enterprises Development Act, 2006 are applicable to us and our organization falls under the threshold limit as specified for Micro, Small, and Medium Enterprises under the MSME Development Act, 2006 (“the Act”),

MSME / Udyog Aadhaar Registration Number: _____
(Certificate is enclosed herewith)

OR*

2. We, (Name of the Company (“the Company”), registered under the Companies Act 1956/2013, having registered office _____ at _____ hereby do declare that We do not fall under the threshold limit as specified for Micro, Small, and Medium Enterprises under the MSME Development Act, 2006 (“the Act”), hence, the requirement to get registered under the Act is not applicable upon the Company as on date.
3. I further undertake to Inform ALTIUS Telecom Infrastructure Private Limited in case change of status from MSME to non MSME or vice versa with relevant documents.

***Strike off whichever is not applicable**

Date:

Authorized Signatory

Name of the person.....

Designation.....

Seal of the firm/Company.....