



Code of Conduct for Business Associates

We do not claim to be more unselfish, more generous or more philanthropic than other people. But we think we started on sound and straightforward business principles, considering the interests of the shareholders our own, and the health and welfare of the employees, the sure foundation of our success

Jamshedji Nusserwanji Tata

The Tata Code of Conduct (TCoC) represents the values and core principles that guide the conduct of every Tata business.

At the Tata Group, we are committed to improve the quality of life of the communities we serve globally through long-term stakeholder value creation based on 'Leadership with Trust'.

TRF has epitomized the true spirits of Ethics in its interactions with all its stakeholders. TRF follows the Tata Code of Conduct (TCoC) in letter & spirit and expects all its Business Associates to adhere to the same principles of TCoC.

Notes:

- This Document is applicable to all the Business Associates of TRF Ltd
- "Business Associate" here means suppliers, customers, vendors, service providers or such other persons with whom TRF has any business or transactional dealings
- Policies of TRF are available at www.trf.co.in



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1) Products and Services

The Business Associate shall be committed to supplying products and services of high quality that meet all applicable standards. The products and services offered shall comply with applicable laws, including product packaging, labelling and after-sales service obligations, etc. The Business Associate shall market its products and services on their own merits and not make unfair or misleading statements about the products and services of competitors.

2) Regulatory Compliance

The Business Associate shall comply with all applicable laws and regulations, both in letter and in spirit, in all the territories in which it operates.

3) Bribery and Corruption

The Business Associate shall not engage in any form of bribery or corruption.

4) Money Laundering

TRF does not involve in any money laundering activities whether by deemed conversion of illegally gained money or whether directly or indirectly, even where the involvement may be unintentional in the conduct of our operations and business activities. The Business Associate shall follow the same standard.

5) Health and Safety

The Business Associate shall strive to provide a safe, healthy and clean working environment for its employees.



6) Human Rights

- The Business Associate shall not engage in child labour in any form.
- The Business Associate shall not use forced labour in any form or manner.

7) Environment

The Business Associate shall strive for environmental sustainability, particularly with regard to the emission of greenhouse gases, consumption of water and energy and the management of waste and hazardous materials and should take necessary consents / licences as may be required at their own cost. The Business Associate shall endeavour to offset the effect of climate change in its activities.

8) Protecting Company Assets

The assets of TRF shall not be misused; they shall be employed primarily and judiciously for the purpose of conducting the business for which they are duly authorised. These include tangible assets such as equipment & machinery, systems, facilities, materials and resources as well as intangible assets such as proprietary information & intellectual property.

9) Third Party Representation

- The Business Associate shall represent our company (including Tata brand) only with duly authorised written permission from our company. They are expected to abide by the Code in their interactions with, and on behalf of us, including respecting the confidentiality of information shared with them.
- The Business Associate shall safeguard the confidentiality on the use of intellectual property and data of TRF.

10) Gifts and Hospitality

Business gifts & hospitality are sometimes used in the normal course of business activity. However, if offers of gifts or hospitality (including entertainment or travel) are frequent or of substantial value, they may create the perception of, or an actual conflict of interest or an 'illicit payment'. Therefore, gifts & hospitality given or received should be modest in value & appropriate, and in compliance with TRF's Gifts & Hospitality policy. The Business Associate shall neither receive nor offer or make, directly or indirectly, any illegal payments, remunerations, gifts, donations or comparable benefits that are intended, or perceived, to obtain uncompetitive favours for the conduct of its business with TRF.

11) Conflict of Interest

The Business Associate shall not engage into a financial or any other relationship with a TRF employee that creates any actual or potential conflict of interest for TRF. The Business Associate understands that a conflict of interest arises when the personal interests of the TRF employee are inconsistent with the responsibilities of his/her position with the company. All such conflicts must be disclosed. Even the appearance of



a conflict of interest can be damaging to TRF and to the Business Associate, and are to be disclosed and approved in advance by TRF management.

12) Reporting Violations

The Business Associate shall notify TRF regarding any known or suspected improper behaviour by the Business Associate relating to its dealings with TRF, or any known or suspected improper behaviour by TRF employees by any of the reporting channels given below:

Reported violations will be treated confidentially without retaliation

Available Reporting Channels

SN	Channel	Contact / Address
1	Chief Ethics Counsellor & Vigilance	Indraneel.sarkar@trf.co.in
2	Email ID (for reporting ethics related issues)	ethics.counsellor@trf.co.in
3	Email ID (for reporting offence under sexual harassment)	posh@trf.co.in
4	Toll Free Number (3 rd Party Helpline)	1800 102 0875
5	Postal Address (3 rd Party Helpline)	PO BOX - P. O. Box No 71, DLF Phase 1, Qutub Enclave, Gurgaon - 122002, Haryana, India
6	Website (3 rd Party Helpline)	www.in.kpmg.com/ethicshelpline/tslindia