

Code of Conduct Policy

The Group

Delta Corp Limited, a flagship company of the Group, is the only listed company engaged in the casino (live, electronic and online) gaming industry in India. Incorporated in 1990 as a textiles and real estate consultancy company and has evolved into a diversified segments like Casino gaming, Online gaming, Hospitality and Real estate. The Company's early-mover advantage has helped secure a leadership position in the Indian organised gaming and entertainment industry.

Date: 19-06-2023

At Deltin Group, we are committed to provide a safe, respectful and inclusive environment for all individuals who engage with our organization. This Code of Conduct sets forth the standards of behavior expected from all participants to ensure a positive and productive experience for everyone.

Page 2-3 **Core Values of the Deltin Group**

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Core Values of the Deltin Group

- a) Guest First
- b) Responsible Conduct /Corporate Citizen
- c) Excellence
- d) Trust & Care
- e) Unity

Business Principles

- a) Fair Dealing

DCL employees shall strive to deal honestly and ethically within the company and on the company's behalf and build productive relationships with one another and third parties based on honesty, integrity, ethical behavior, and mutual trust. They also need to ensure not to take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or other unfair practices.

- b) Guest First

DCL makes each guest feel special and excels at guest satisfaction. The Company listens attentively to guests, responds on time to requests, ensures guests are always provided with the highest service standards, and goes the extra mile to serve.

With suppliers and stakeholders, the Company communicates mutual intention and expectations, agrees to what it can deliver, always delivers what it decides, and makes it easy to work with.

- c) Responsible Conduct

DCL employees shall deal on behalf of the company with professionalism while conforming to high moral and ethical standards. Every employee shall strive to honor commitments and be responsible for complying with the Code of Conduct in their environment. Failure to adhere to the Code could attract severe consequences, including termination of employment.

- d) Equal Opportunity Employer

DCL seeks to provide equal opportunity to all employees and qualified applicants regardless of race, caste, religion, marital status, gender, sexual orientation, age, or nationality.

Our policies promote diversity, equality in the workplace, and compliance with all labor laws. Employees shall be treated with dignity and respect, have the right to privacy, and be heard, and in all matters, decisions are based on merit.

- e) Communications

You, our employees at DCL, are our most valuable asset. To ensure you are productive and satisfied, we try to practice what we preach—direct, open, and honest communication. Tell us your concerns and ask questions from your immediate superior(s). You will get full attention promptly. We listen.

f) Health, Safety, Security, and Environment

DCL shall strive to provide its people with a safe, healthy, clean, and ergonomic working environment. It shall prevent the wasteful use of resources and be committed to improving the environment.

g) Employability For Immediate Family Members

- a. An employee must declare details of the family members or blood relations employed or to be employed with DCL at any time during their employment with DCL Group Company. Failing to do so shall make the employee liable to be terminated without notice or compensation.
- b. Family members shall not work in the same Department. In exceptional cases, they must obtain written permission from Group Managing Director or General Manager and submit the same to HR Department.
- c. Romantic relationships between co-workers can create an actual or apparent conflict of interest depending on the work roles and respective positions of the co-workers involved. If a romantic relationship has the potential to create an actual or apparent conflict, it shall require changes to work arrangements. Employees shall inform General Manager or their HOD of the same in writing at the earliest. Failing to do so shall make the employee liable to be terminated forthwith without any notice or compensation.
- d. Definition of family members – parents, siblings, children, cousin, spouse/significant other, fiancée.

Code of Conduct

The list is only indicative; however not exhaustive. Please contact Human Resources Department if you have any questions on HR Policies.

- a) **Economic Priority-** Long-term profitability is essential to achieving business goals and for continued growth of the Company. It is a measure of efficiency and commitment, a value that stakeholders place on its products and services. Employees agree to contribute towards the profitability of the company by taking responsibility & accountability for their respective work. They agree to accept responsibility and hold themselves accountable for their respective work, maintaining the highest level of operating process and standards; they are required to be responsible and accountable for funds and the use of Deltin's assets and take decisions that promote sustainable & profitable development of the company.
- b) **Excellence** – Ensure that Deltin is the undisputed leader in the Indian gaming and hospitality industry, by growing aggressively while maintaining the highest levels of operating standards.
- c) **Organizational Commitment** – Employees shall show ability and willingness to align their behavior with the organization's needs, priorities, and goals. Employees shall act in ways that promote Deltin's goals.
- d) **Team** – Employees must show intention to work cooperatively with others, put the team ahead of their personal needs, and trust each other to deliver on respective obligations.
- e) **Personal Values-** At all times, employee shall ensure:
 - i. Honesty for continued improvement and for maintaining the mutual trust necessary for a high-functioning team
 - ii. Be truthful in representing the company's performance and their personal performance, maintaining accurate records and books of account
 - iii. Carry out their roles and responsibilities with discipline, even when it seems inconvenient and when doing so may be uncomfortable.
 - iv. Stick to the standards and protocols even as they constantly seek ways to improve
 - v. Be excited by the possibility of tackling new or emerging problems creatively.
 - vi. Errors and unanticipated bad outcomes as potential opportunities to learn and improve
 - vii. Reflect upon the lessons during their daily activities and use those insights for continuous improvement of their work and the team's functioning.
- f) **Accountable & Responsible Conduct** - Employees shall be responsible for making the right decisions at all times and will acknowledge and accept personal accountability for the ethical quality of their decisions and omissions to:
 - i. Their self, their colleagues, company, and clients (as required in business dealings)
 - ii. Behave in ways that are consistent with the law, regulation, and code of conduct
 - iii. Ensure, at all times, the integrity of data or information furnished
 - iv. Full compliance with applicable company policies and procedures (SOP)

- v. Respect and observe the confidentiality of information about intellectual property rights, trademarks, and innovation of DCL or partner companies; and strictly observe a practice of non-disclosure
 - vi. Ensure that the assets of the company are not misused; they will be employed primarily and judiciously to conduct the business for which they are duly authorized. These include tangible assets such as equipment and machinery, systems, facilities, materials, and resources, as well as intangible assets such as information technology and systems, proprietary information, and relationships with Guests and suppliers.
 - vii. Shall always act in the company's interest and ensure that any business or personal association does not involve a conflict of interest with the Company
 - viii. Employees will avoid personal activities and financial interests, which could conflict with their responsibilities towards the company
 - ix. Shall ensure inter and intra-function synergetic working to create a rewarding and safe workplace, provide superior Guest service, and reduce waste in everything employees do.
 - x. Shall measure, appraise and report a relevant and accurate report of individual and team performance in a timely, regular, and reliable manner. Employees will set standards and targets for improvement and innovation to enhance operational processes, their morale, Guest satisfaction, and financial growth
 - xi. If aware of a violation or potential violation of the Code of Conduct, employees must report it to Supervisor/ Manager/ HOD or HR, failing which employees will be held accountable.
- g) **The integrity of data furnished** - Every employee shall ensure, at all times, the integrity of data or information furnished by him/her to the company or on behalf of the company. He/she shall be entirely responsible for ensuring that the confidentiality of all data is retained and in no circumstance transferred to any outside person/party in the course of normal operations without express guidelines from or the approval of the management.
- h) **Company Funds-** Employee shall be responsible and accountable for funds and using the Company's assets.
- i) **Company's Asset** – All employees possessing Deltin's assets in the course of employment with Deltin shall hand over the same back to the company as and when the company desires so. In case, an employee resigns or the company terminates his/her services or superannuates hi,/her from employment, he/she shall hand over all company's properties in his/ her possession in good and working condition, including equipment, cash, documents, residential premises, etc. failing which the company shall recover the same through legal recourse, the cost of which shall be borne by the employee.
- j) **Company Premises** – No employee shall indulge in any commercial activity or business or utilize any facilities of the Company for private purposes.
- k) **Protection of Secrecy** - During the continuation or after the termination of employment by the Company, directly or indirectly, divulge to third parties any details of the Company's business,

finance, transactions, affairs, or dealings without the express written permission of the Management.

- l) **Compliance with Standards and Procedures** – Employees shall comply with all policies and procedures applicable to their work.
- m) **Employment** – During employment with the Deltin Group, no employee shall directly or indirectly be interested in, engage in, be concerned with, or provide services to any other person, company, business entity, or other commercial organization except for “charitable purpose” as defined under Indian law.
- n) **Conflict of Interest** – Every employee must declare any of his / her business interests, whether or not similar to or in conflict with the business or activities of the Company. Employees should avoid conflicts of interest and ensure that personal relationships and activities do not compromise Deltin’s objectivity or reputation. Never use their position, contacts, or knowledge of the Deltin Group for personal gain. We don't allow personal interests, investments, and activities (including those of family members) to conflict with our work.
- o) **Confidentiality** - Terms and conditions of employment are strictly confidential matters. Any disclosure of employment terms and conditions to other employees or outside parties constitutes a breach of employment contract.
- p) **Guest Confidentiality** - The golden rule to be followed by the employee is that they shall not give out information about a guest, nor do they discuss any guest's personal life. In conversation with guests, always remain professional by being courteous and respectful.

In addition, no employee shall discuss other DCL employees with a Guest - roster timing, floor availability, attendance or leave etc.
- q) **Indiscipline, Insubordination, and Misconduct** - Indiscipline, insubordination, and misconduct will not be tolerated under any circumstances. Disciplinary action shall be taken against employees as per the rules and regulations being enforced by the Company which shall change from time to time and will be binding on all the employees. For detailed employee rules and regulations, please contact the HR Department.
- r) **Entertainment Invitations** – Employees should turn down invitations to meals or entertainment that are excessive in nature or frequency, to avoid embarrassment or loss of objectivity when conducting the Company business. Management is to be informed of such invitations.
- s) **Accepting Gifts** - Without the prior consent of the Company, no employee shall accept directly or indirectly, any commission, rebate, fee, gratuity, or gift in any manner, ask for or solicit any favor, monetary or otherwise, or solicit any such benefits from such person, firm, Company or organization.

- t) **System & Network** - Communication facilities (which include both network and the hardware that uses it, like computers and mobile devices) are a critical aspect of the company's property, both physical and intellectual.

Employees are provided access to the computer network to assist them in the performance of their jobs. Employees may also be provided with access to the internet through the computer network. Such assets and the computer network are the property of the company and are to be used for legitimate business purposes.

Anything an employee does while using corporate electronic facilities or stores on Company's premises (e.g., letters, memos, and other documents) might be disclosed to people inside and outside the company. Therefore the Company shall monitor, access, and disclose employee communications and other information on its corporate electronic facilities or on our premises where there is a business need to do so, such as protecting employees and users, maintaining the security of resources and property, or investigating suspected employee misconduct.

Employees have a responsibility to use the Company's computer resources, stationeries and the internet in a professional, lawful, and ethical manner. Employees must be sure to follow all electronic security policies. Abuse of the computer network or the internet may result in disciplinary action, and if there is a serious breach the offense may lead to the Employee being dismissed.

- u) **Telephone Use** - Personal use of the telephone should be limited to emergencies and unusual circumstances. All personal calls should be taken during breaks (for Operations staff/ Front line staff). Personal ISD / STD calls will be billed to the employee in case phones have been provided by the Company for business use. Phones are not allowed in work areas for Front Line Staff and Team Leaders while on duty.
- v) **Employment Bond** – For freshers/ employees taking specialized training in the Company, or Employees sent abroad for training purposes for more than three days, they have to sign a contract that they shall work for a specified period with the Company, or the Company has the right to recover the cost of training if the employee leaves his employment during this period.
- w) **Equal Opportunities** - The company hires, trains, promotes, and compensates employees based on individual competence and potential without regard for race, color caste, religion, sex, sexual orientation, age, or marital status.
- x) **Signing a Contract** – Employee shall never sign any contract on behalf of the Company unless all of the following are met:
- i. An employee is authorized to do so under Signature Authority and Approval Policy.
 - ii. The contract has been approved by Finance/ Legal Department, and
 - iii. The employee has studied the contract, understood its terms, and decided that entering into the contract is in Company's interest.

All contracts at the Company should be in writing and contain all of the relevant terms to which the parties agree – the company does not permit "side agreements," oral or written.

y) Gambling on Deltin Premises:

All employees associated with or directly related to Gaming and Hotel operations within Deltin Group in Goa, Sikkim & Daman are prohibited from gambling/wagering on slot machines owned or operated by any of the Deltin Group Companies or by any other Company within the territory of Goa, Sikkim & Daman.

z) Non- Harassment - The company is committed to the elimination of all forms of harassment in the workplace including harassment that involves sex, race, ethnicity, religion, sexuality, and age. Employees shall ensure that proper standards of conduct and behavior are maintained at all times in the workplace. Harassment in any form is condemned and any such behavior will result in serious disciplinary action or termination of employment and potential legal consequences. Employees shall ensure that they do not behave in a manner or display information that will:

- i. Create an intimidating, hostile, and/or offensive working environment
- ii. Potentially affect an individual's work performance or capability
- iii. Effect an individual's career prospects and opportunities.

aa) Sexual Harassment - Sexual harassment is a serious matter. Such practices create a demeaning work environment characterized by intimidation and fear, the precise opposite of our company's goal. Anyone who engages in this behavior is subject to formal punishment, including dismissal.

Sexual harassment will include but not be limited to:

- i. Unwelcome sexually determined behavior (whether directly or by implication) as physical contact and advances,
- ii. A demand or request for sexual favors by promising promotion or pay increase or easier work life,
- iii. Unwelcome or inappropriate physical contact,
- iv. Sexually colored remarks
- v. Showing pornography
- vi. Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature.
- vii. Use of the electronic mail system to send offensive messages/pictures that contains sexual implications/innuendoes or any other comment that offensively addresses someone's sexual orientation. This will also include 'Wall-papers and Screen Savers' on computer screens.

Any employee who may have been victimized during the course of employment is encouraged to approach their Manager/ HOD or the Internal Complaints Committee at icc@deltin.com and if their concern is deemed well-founded, action will be taken against the offending individual by following the process laid down by law as per Vishaka Guidelines.

- bb) **Alcohol / Drugs** – Employees are not allowed to bring or have any alcohol or drugs in their possession while on duty or into the Office premises. Employees are also not allowed to come on duty smelling of alcohol or under the influence of alcohol or drugs.
- cc) **Legal Dispute** - Employees involved with a Company lawsuit or other legal dispute should not discuss it with outsiders or other Company employees without prior approval
- dd) **Jurisdiction and Dispute Resolution** – Any dispute which may arise between an employee and the Company shall be referred to arbitration by a sole arbitrator to be appointed by the Ethics Committee and his decision shall be binding on both parties. The venue of arbitration shall be Daman. The courts in Daman shall have exclusive jurisdiction to the exclusion of all other courts.
- ee) **Acceptable Behavior:**
- i. Always be polite and have a positive attitude
 - ii. Know your job and the company and be ready to help others
 - iii. Do not get involved in arguments
 - iv. Remember the Guest is always right and arguing with colleagues creates a tense and bad working environment
 - v. Listen to what people are asking/ saying and act upon this if necessary
 - vi. Speak clearly and ensure that employees have been understood
 - vii. Smile – this can make someone's day
 - viii. Stand up straight – bad posture can make employees look uninterested and tired
 - ix. Ask questions – if employees do not know something ASK; if asked a question take care to give the correct answer or ask someone who does know
 - x. Be disciplined, punctual, responsive, and accountable
- ff) **Help and Advice**-Human Resources Function shall happily meet and assist an employee with any problem they may have. If they are unable to assist they shall put employees in touch with someone who will be able to help employees.

Work Ethics

The company expects its employee to understand our basic requirements: that they act diligently, responsibly, professionally, and safely in our work environment, follow policies and practices, and treat each other and Guest with courtesy and respect.

The company would expect employees to follow the general rule of professional standards. Certain specific guidelines, however, since they may be unique to the Company, are provided in this handbook. For detailed policy or any questions, please contact Human Resources Department. Additional rules may be periodically published.

Disciplinary Action

To maintain a fair, consistent, and logical work discipline, all employees, regardless of position, are subject to disciplinary procedures detailed below. Each warning will give specific advice on the required problem, standard or behavior, and how to acquire that standard or expected behavior. A review date will be agreed upon and follow-up taken at the appropriate time.

- a) **Stage 1: Verbal Warning/File Note:** For minor breaches of discipline or failure to achieve satisfactory standards, a verbal warning will be given by HOD and recorded on the employees' files.
- b) **Stage 2: Written Warning:** In the event of further breaches of discipline or failure to reach operating standards, counseling will take place and a written warning will be given, normally by Department Head and/ or the Human Resource Department.
- c) **Stage 3: Final Written Warning/Suspension/Possible Dismissal:** For more serious offenses or further transgressions, the Department Head in the presence of the Human Resources Department will issue a final written warning. This written warning will advise employees of the conditions under which their termination will take effect.
- d) **Instant Dismissal:** Instances of 'gross misconduct' or 'gross neglect of duty' may result in instant dismissal.

Punishments/Actions For Violating The Code Of Conduct

- Level I misconduct in its various forms is that which is most readily correctable.
- Level II misconduct is more acute and requires a more rigorous form of discipline.
- Level III misconduct is very serious and considered not correctable. In such cases discharge is recommended for the first offense.

Level 1

1. Unsatisfactory attendance (Unexcused)
2. Unpunctual (Unexcused)
3. Unsatisfactory Work Performance
4. Out-of-work area
5. Habitual breach of any standing order or any law applicable to the establishment
6. Holding meeting inside the premises of the establishment without the previous permission of the Manager
7. Failure to observe safety instructions notified by the employer
8. Rude behavior with patrons & colleagues/seniors
9. Posting or altering any matter on the "Notice Board" or Company's property
10. Sleeping whilst on duty
11. Not following the prescribed dress code
12. Carrying excess cash disproportionately over and above the declared amount in the register at the security gate
13. Not following the duty rosters
14. Smoking or spitting on the premises of the establishment where it is prohibited by the employer
15. Distributing or exhibiting within the premises of the establishment hand-bills, pamphlets, posters, and such other things or causing to be displayed using signs or writing or other visible representation on any matter without the previous sanction of the Manager
16. Sexual Harassment*

Level 2

1. Insubordination
2. Abusive language or gestures
3. Substance abuse

4. Sleeping on the job
5. Negligent work performance
6. Less than Ten days No call/No show
7. Sexual Harassment*
8. Overstaying the sanctioned leave without sufficient grounds or proper or satisfactory explanation;
9. Collection without the permission of the Manager of any money within the premises of the establishment except as sanctioned by any law for the time being in force;
10. Engaging in trade within the premises of the establishment
11. Willful damage to work in process or to any property of the establishment;
12. Disclosing to any unauthorized person any information regarding the processes of the establishment which may come into the possession of the workmen in the course of his work;
13. Unauthorized possession of any lethal weapon in the establishment
14. Willfully and knowingly making false statements about the colleague, company, management, company's products and services, etc.
15. Posting any information about colleagues, peers, subordinates, or seniors in any of the communication channels (email IDs, websites, letters, notice boards, etc) is unauthorized.
16. Any act harmful to the health or well-being of your colleague or other employees of the company
17. Soliciting/demanding cash or kind from colleagues, peers, subordinates, seniors, and vendors directly / indirectly connected with the organization whilst in employment either in an official or personal capacity.
18. Gaming staff accepting any gratuity (tip) or gift inside or outside the casino premises, without reporting the same to seniors.
19. Making false accusations against the Management or other officer of the Company.
20. Fighting, and quarreling whilst on duty.
21. Providing incorrect information in the application for employment
22. Unauthorized statement to the media.
23. Consumption of stock without permission.
24. Not taking proper care of tools and equipment.
25. Watching movies in the auditorium without proper permission.
26. Misusing credit cards/debit cards/vouchers etc. for any willful gain.
27. Misguiding Client for willful gains.

Level 3

1. Theft or fraud
2. Drinking or drug abuse on the job
3. Sabotage or vandalism
4. Ten Days No Call/No Show
5. Sexual Harassment*
6. Sleeping on the Job
7. Falsification of Documents
8. Threats and/or Assault
9. Job Abandonment
10. Going on an illegal strike or abetting, inciting, instigating, or acting in furtherance thereof
11. Willful slowing down in the performance of work, or abetment or instigation thereof
12. Theft, fraud, or dishonesty in connection with the employer's business or property or the theft of property of another workman within the premises of the establishment
13. Taking or giving bribes or any illegal gratification
14. Gambling within or outside the premises of the establishment

15. Gaming staff accepting any gratuity (tip) or gift inside or outside the casino premises without reporting the same to seniors
16. Tampering with the attendance system
17. Cheating patrons/ guests financially
18. Selling of drugs, illegal and contraband materials
19. Any criminal activity within or outside Deltin premises that could result in damage to Deltin's reputation.

*Sexual Harassment misconduct can fall into any of the three categories based on the nature of the misconduct and as per law of the land.

DETERMINATION OF DISCIPLINE

LEVEL I MISCONDUCT

- 1st Offense – Verbal Reprimand
- 2nd Offense – Written Reprimand
- 3rd Offense – One-day Disciplinary Lay Off (ODLO)
- 4th Offense – Two-Day DLO*
- 5th Offense – Discharge**

LEVEL II MISCONDUCT

- 1st Offense – Two-day DLO*
- 2nd Offense – Discharge**

LEVEL III MISCONDUCT

- 1st Offense – Discharge**