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To All Directors, Officers and Employees of Summit Digitel Infrastructure Private Limited

The Code of Business Conduct and Ethics (the "Code") applies to all directors, officers and employees of Summit Digitel Infrastructure Private Limited (collectively, "Summit Digitel", "we," "us," "our" or the "company).

It has always been and remains our policy that all of our activities should be conducted with the utmost honesty and integrity and in full compliance with all legal and regulatory requirements. In varying degrees, as a manager or employee of the company, you represent us in your dealings with others, whether they be other employees, customers, suppliers, competitors, governments or the general public. Each of us is responsible for preserving and enhancing the company's world-class reputation and the Code sets out what is expected of all of us who are part of the team.

The enclosed Code, which has been endorsed by Summit Digitel's Board of Directors, sets out the commitments we all must make as part of the Summit Digitel team. We urge you to read it carefully.

The Code does not cover every situation you may encounter while at Summit Digitel and that is not its purpose. Rather the Code sets forth basic principles and standards you must adhere to. When in doubt, please refer any questions to your supervisor or Chief Risk Officer (or the Chair of the Board in the case of directors).

Thank you for your continued dedication to Summit Digitel and for your commitment to upholding the standards set forth in the Code.

Yours truly,



Mihir Nerurkar Chairman Summit Digitel Infrastructure Private Limited Dhananjay Joshi CEO Summit Digitel Infrastructure Private Limited