

# Code of Conduct

## Policy Framework

This policy is to put emphasis on the high legal and ethical standards expected from all the employees of PIX Transmissions Limited.

This “Code of Conduct Policy” has been formulated in order to foster and maintain employee trust and confidence in the professionalism and the integrity of the employees of the Company by ensuring that all employees and business partners adhere to appropriate standards of conduct as set out in this Policy.

This Policy aims to provide guidance to all employees and business partners of the Company on the prescribed principles and manner of conduct for employees when they are undertaking business on behalf of the Company.

The circumstances of conducts as set out below in this Policy, although not exhaustive, are intended to cover those situations, which are most likely perceived to be encountered by Employees or business partners. In case any employee encounters any circumstance which is not covered hereunder or in case of any doubt, employees should seek guidance from the Human Resource Department and act accordingly.

Any breach of the Policy may result in disciplinary action against the particular employee including, potential dismissal or termination of employment or any other legal action as may available with the Company or all of the above together.

## Scope

The scope of this policy is applicable towards:

- 1) PIX employees
- 2) Customers
- 3) Business Partners
- 4) Stakeholders
- 5) Government

## PIX Employees

Equal Opportunity employer: PIX Transmissions Ltd. is committed to creating an inclusive working environment to maximize the potential of all staff, and providing equal opportunities in all aspects of employment and avoiding unlawful discrimination at work. PIX Transmissions Ltd will not tolerate discrimination, harassment, bullying or victimization of employees or third parties who do work on PIX's behalf.

Business activities such as hiring, transfers, promotion and training compensation and recognition of employees are conducted without regard to race, color, religion, gender, identity expression, sexual orientation, national origin, genetic disability, caste or age. Discrimination in business activities will not be tolerated.

**Dignity and Respect:** Our workforce is our most dynamic asset, the individual treatment of the employee by the supervisory and managerial staff will make a great difference in the level of employee productivity and creativity, furthermore fostering greater employee engagement within a business. A happy and satisfied employee is typically a highly productive one. Each employee must always be treated with the utmost respect and dignity.

**Bribery and Corruption:** Employees working for PIX or on behalf of PIX must not engage, offer or receive any form of illegal or improper payments or favors either directly or through any third party (such as an agent or distributor).

**Gifts and Hospitality:** During the course of business activity, employee may accept minor and appropriate gifts of modest values on behalf of the Company. However, any employee working for PIX or on behalf of PIX shall not accept gifts or any other personal benefit or privilege that would in any way influence or appear to influence any business decision.

**Assets and Information:** Employees shall use all company assets, tangible and intangible, including computer and communication equipment, for the purpose for which they are provided and in order to conduct our business. Such assets shall not be misused. Employees shall respect and protect all confidential information and intellectual property of our company. Employees without authorization shall not disclose any company or business related information publically.

**Insider trading:** Our employees must not indulge in any form of insider trading nor assist others, to derive any benefit from access to and possession of price sensitive information that is not in the public domain.

**Prohibited drugs and substances:** We do not tolerate use of any prohibited drugs and substances from being possessed, consumed or distributed at workplace or during the course of working hours.

**Conflict of Interest:** Employees and executive Directors shall always act in the interest of the company and ensure that any business or personal association including close personal relationships that they may have, does not create a conflict of interest with their roles and duties in the company or the operations of company. Further, our employees and executive directors shall not engage in any Business, relationship or activity, which might conflict with the interest of our company.

**Simultaneous Employment:** It is almost always a conflict of interest for a Company employee to work simultaneously for a competitor, customer or supplier. Except with the prior approval from Management, employees are not allowed to work for a competitor. The best policy is to avoid any direct or indirect business connection with our customers, suppliers or competitors, except when mandated on behalf of the Company.

**Harassment:** The Company is committed to provide a work environment that is free of inappropriate behavior of all kinds and harassment on account of age, physical disability, marital status, race, religion, caste, sex, sexual orientation or gender identity. Employees are responsible for supporting the Company in its endeavor to protect others from any form of such harassments. We do not tolerate any form of harassment, whether sexual, physical, verbal or psychological.

In the course of business conduct of any Employee, wherever harassment occurs to any such Employee as a result of an act or omission by any third party or outsider, the Company shall take all steps necessary and reasonable to assist such affected Employee in terms of support and preventive action.

**Human Rights:** We take our responsibility to respect human rights seriously. We do not employ children at our workplaces and we do not encourage forced labor in any form. The Company does not confiscate personal documents of our employees, or force them to make any payment to us or to anyone else in order to secure employment with us, or to work with us. We have clear and fair disciplinary procedures, which necessarily include an employee's right to be heard. We respect our employees' right to privacy. We have no concern with their conduct outside our work environment, unless such conduct impairs their work performance, creates conflicts of interest or adversely affects our reputation or business interests.

**Corporate Social Responsibility:** This Corporate Social Responsibility Statement (the CSR Statement) reflects the core values that have guided, and continue to guide PIX Transmissions Ltd. PIX recognizes that its activities and services have an impact on the wider social, environmental and economic well-being. By addressing these impacts we can also improve the quality and performance of our core organizational processes and responsibilities. By embracing Corporate Social Responsibility (CSR) we actively look for opportunities to improve our environment and contribute to the well-being of the communities in which we operate.

**Reporting Concern:** Any PIX Transmissions Ltd employee can choose to make a protected disclosure, if he/she comes across any malpractices happening in the organization. The company shall ensure protection to such employee and any attempts to intimidate him/her would be treated as violation of the Code.

## Customers & Business Partners

**Products and services:** We are fully committed for continuous improvement of our products and services quality to ensure that the best in class quality should be delivered to our customers.

**Fair competition:** We support fair competition and development of open markets, and shall not engage in any activity that will constitute as anti-competitive behavior.

**Dealing with customers:** Our dealing with customers shall always be fair, transparent and professional. We respect our customers' right to privacy in relation to their personal data. We are committed to safeguard our customers' personal data, in accordance with applicable law.

**Business Partners:** We shall select our Business Partners fairly and transparently. We seek to work with business partners who can demonstrate that they can work in line with the Company's stated goals and objectives. We expect them to adopt ethical standards comparable to our own. Business partners associated with us shall present our products in honest and forthright manner and avoid unfair or deceptive trade practices.

## Stakeholders

PIX Transmissions Ltd always focuses on communicating with truth and candor which underscores our commitment to accuracy in our Company's books and records. Business records, including our financial statements, contracts and agreements, must always be accurate and reflect a forthright presentation of the facts. No matter what type of document or how insignificant it might seem, the information contained in a business record must always be truthful and complete. Financial records must reflect all components of the financial transactions and events.

## Government

Political Non-Alignment: PIX Transmissions Ltd. do not support any specific political party or candidate for political office. Our conduct must preclude any activity that could be interpreted as mutual dependence/favour with any political body or person, and we do not offer give any Company funds or property or other resources as donations to any specific political party, candidate or campaign.

## Accountability

It is a condition of an appointment and/ or employment that all employees must understand and adhere to the Company's Code of Conduct at all times and abide by the standards, requirements and procedures laid down herein. They must:

- a) Commit to individual conduct in accordance with this Policy.
- b) Observe both, the spirit and the letter of the law in their dealings on Company's behalf.

- c) Recognize Company's responsibility to its shareholders, customers, employees, those with whom Company does business, and to society. Assess priorities in the context of discharging these responsibilities appropriately on Company's behalf.
- d) Conduct themselves as responsible members of society, giving due regard to health, safety, and environmental concerns, and human rights, in the operation of Company's business.
- e) Report any suspected breach of the law or this Policy to the HR Office.

**Note:** This Code does not provide a comprehensive and complete explanation of all expectations from a Company standpoint or obligations from a stakeholder standpoint. Employees have a continuing obligation to familiarize themselves with all applicable law, group-level advisories and policies, company-level policies, procedures and work rules as relevant. For any guidance on interpretation of the Code, employees may seek support from the HR Department.