

Dated : 16th July 2020

Code of Conduct

Techtrol is recognized as most reliable & trusted brand, delivering quality products unsurpassed in terms of accuracy, workmanship, performance, safety & ease of installation, providing long uninterrupted service in wide & varied industrial applications. Our products are designed & engineered for optimal performance and with practical experience gained over last several years has equipped us, to meet the most demanding user requirements.

Our commitment is being accountable, straightforward and honest in all of our business dealings.

Our people are our strength; and as such, our prime philosophy is to respect them as individuals with inherent skills, to be channelized to create value for our society & country. We believe that, our reputation and our product quality & services are result of their team work; and as such, it has been our endeavour to train them continuously for higher multi-skills and better understanding of our products & customer expectations of us.

1. Compliance with Legal Laws / Regulations:

All business and other activities of Pune Techtrol Pvt. Ltd. shall be carried out strictly in compliance with applicable laws/regulations/government orders.

Pune Techtrol Pvt. Ltd. must be compliant, not only with the laws and regulations in the countries in which we operate, but be aware of the continuous development of international regulations, social standards and voluntary initiatives and adopt those, that are relevant to our business.

2. Honesty and Ethical Conduct:

We operate with the highest level of honesty and ethical conduct, at all times. We have zero tolerance for unethical behavior.

3. Confidentiality and Integrity:

Pune Techtrol Pvt. Ltd. will recognize obligation to comply with regulatory requirements, regarding various types of communication and to protect the confidentiality of our business and customer information.

Pune Techtrol Pvt. Ltd. shall preserve the integrity and confidentiality of the information shared or required by the customer/vendor. This may include Tender Documents, Product prices, Drawings, Technical Data sheet Documents, Samples provided by Customer etc.

Our employees shall respect and protect all confidential information and intellectual property of our company.

Our employees shall safeguard the confidentiality of all third party intellectual property and data. Our employees shall not misuse such intellectual property and data that comes into their possession and shall not share it with anyone, except in accordance with applicable company policies or laws.

Our employees shall promptly report the loss, theft or destruction of any confidential information or intellectual property and data of our company or that of any third party.

PUNE TECHTROL PVT LTD

S-18, MIDC, Bhosari, Pune - 411026, India

Ph : +91-20-66342900

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4. Proper use of company assets

All employees and officers should protect Pune Techtrol Pvt. Ltd. assets and ensure its efficient use. Theft, carelessness, and waste have a direct impact on Pune Techtrol Pvt. Ltd. profitability. All Company assets are to be used for legitimate business purposes. Any suspected incident of fraud or theft should be immediately reported for investigation. Assets should not be used for other than Techtrol business.

The obligation of employees and officers to protect Pune Techtrol Pvt. Ltd. 's assets includes Pune Techtrol Pvt. Ltd. information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information is a violation of Company policy. It could also be illegal and results in civil or criminal penalties.

5. Political non-alignment:

Pune Techtrol Pvt. 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 or give any company funds or property or other resources as donations to any specific political party, candidate or campaign.

6. Bribery and corruption:

We do not tolerate bribery or corruption in any form. This commitment underpins everything that we do.

Our employees and those representing us, including agents and intermediaries, shall not, directly or indirectly, offer or receive any illegal or improper payments or comparable benefits that are intended or perceived to obtain undue favors for the conduct of our business.

7. Prohibited drugs and substances:

Use of prohibited drugs and substances creates genuine safety and other risks at our workplaces. We do not tolerate prohibited drugs and substances from being possessed, consumed or distributed at our workplaces, or in the course of company duties.

8. Occupational Health and Safety:

Pune Techtrol Pvt. Ltd. endeavors to create hazard-free workplaces in all its locations for its employees, vendors, contractors, and others working in Pune Techtrol Pvt. Ltd. locations by applying high standards of Occupational Health And Safety. Pune Techtrol Pvt. Ltd. strives to assure the safety of its products and services through its safety processes and safety practices.

Each employee, staff, each vendor of Pune Techtrol Pvt. Ltd. is responsible for complying with the safety instructions, for using personal protection equipment when required, and for reporting on any shortcomings regarding safety instructions or protection measures while they are in Pune Techtrol Pvt. Ltd. premises. Pune Techtrol Pvt. Ltd. also encourages all its vendors to follow sound Occupational Health And Safety in their own premises.

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9. Conflict of Interest:

Pune Techtrol Pvt. Ltd. employees should not enter into any situation in which their personal or financial interests may conflict with those of the Pune Techtrol Pvt. Ltd. Pvt. Ltd..

10. Human Rights:

Pune Techtrol Pvt. Ltd. respect human rights.

10.1 Forced and Slave Labor:

Pune Techtrol Pvt. Ltd. will not use any form of forced, compulsory or slave labor. Employee may not require any kind of “deposits”, nor we retain employees’ identity documents after they leave. Employee has the right to leave their organization after reasonable notice as per applicable terms & conditions.

10.2 Child Labor:

Pune Techtrol Pvt. Ltd. will not use child labor. Pune Techtrol Pvt. Ltd. will follow age Limit criteria as per legal guidelines in Factory Act or as per legal legislation.

10.3 No discrimination:

Pune Techtrol Pvt. Ltd. shall not apply any type of discriminatory practice with regards to recruitment, compensation, access to training, promotion, termination of the employment agreement or retirement, based on race, caste, creed, nationality, religion, age, physical or mental disability, gender, marital status, sexual orientation or political affiliation. Pune Techtrol Pvt. Ltd. does not tolerate any type of harassment in the workplace.

10.4 No harsh or inhumane treatment:

Pune Techtrol Pvt. Ltd. shall treat their employees with dignity and respect. Under no circumstances shall physical punishment, sexual or racial harassment, verbal or power abuse or any other form of harassment or intimidation be permitted.

10.5 Safe and hygienic working conditions:

Pune Techtrol Pvt. Ltd. shall provide a safe and healthy workplace to their employees, ensuring minimum conditions of light, ventilation, hygiene, fire prevention and safety measures. Workers shall have access to clean toilet facilities and safe drinking water.

10.6 Wages are paid:

Pune Techtrol Pvt. Ltd. shall ensure that wages paid meet at least the minimum legal or collective bargain agreement, should this latter be higher. In any event, wages should always be enough to meet at least the basic needs of workers and their families and any other, which might be considered as reasonable additional needs. Pune Techtrol Pvt. Ltd. shall not make any withholdings and/or deductions from wages for disciplinary purposes, nor for any reasons other than those provided in the applicable regulations, without the express authorization of workers. Likewise, they shall provide all workers with written and understandable information about their wage conditions upon their recruitment, and detailed information about the particulars of their wages every time when these are paid. Pune Techtrol Pvt. Ltd. shall also ensure that wages and any other allowances or benefits are paid on time

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and are rendered in full compliance with all applicable laws and specifically, that payments are made in the manner that best suits the workers.

10.7 Working hours are not excessive :

Pune Techtrol Pvt. Ltd. shall adjust the length of the working day to the provisions of the applicable laws. Pune Techtrol Pvt. Ltd. shall not require their employees to work, as a rule of thumb, in excess of 48 hours a week and workers shall be granted at least one day off for every 7 calendar day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated as per company norms or mutually agreed rate.

10.8 Learning:

Pune Techtrol Pvt. Ltd. is committed to provide the opportunities for employees to continuously develop competence and flexibility, so that they are well fitted to adapt to changes in technology and business and can secure and enhance quality and efficiency in our processes, services and products.

10.9 Employees :

Each employee should have a good working knowledge of the Principles and policies, relevant to their jobs and apply them in their work.

11. Environmental Awareness:

Pune Techtrol Pvt. Ltd. shall be duly committed at all times to protect the environment and shall comply with the standards and requirements of the applicable local and Indian Laws & Regulations. Likewise, Pune Techtrol Pvt. Ltd. commit to comply with environmental standards established by National or State including, if applicable, the necessary measures to reduce and compensate such impact in order to apply said standards.

12. Code Implementation:

Pune Techtrol Pvt. Ltd. shall implement and maintain this Code. This code shall be implemented by all senior member of Managements or persons appointed by Management. Senior Management shall be responsible for the implementation and enforcement of this Code.

The Management team has the responsibility to maintain and improve this time to time.

Pune Techtrol Pvt. Ltd. shall communicate the Code to all employees and those in any way involved in the business with Pune Techtrol Pvt. Ltd. . This code is communicated to all concerns on time to time.

12.1 Transparency :

Pune Techtrol Pvt. Ltd. shall carry out activities in an honest, upright and transparent way, keeping for these purposes an appropriate accounting records system that facilitates the traceability of their decisions, as a preventive measure versus any type of corruption, bribe and extortion that might arise.

Pune Techtrol Pvt. Ltd. employees shall not offer / or take , grant, request or accept any gifts or donations to/from Techtrol buyers / Customers / Vendors, which might infringe the provisions of the Pune Techtrol Pvt. Ltd. Code of Conduct ”.

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12.2 Reporting of Non-compliance of Code:

All employees and any other stakeholders/ Interested Parties have the duty to report any breach of the code of conduct to relevant managers or more senior management teams.

No manager or employee will be criticized for any loss of business resulting from adherence to the code of conduct.

Equally, Pune Techtrol Pvt. Ltd. Management undertake that no employee will suffer as a consequence of bringing to their attention or that of senior management, a breach or suspected breach of business dealings.

Anyone can Contact and report to following in case of violations of this code of conduct:

Contact Person : Mr. Mayank Khatan (CEO), Mr. Ramesh Pabalkar (General Manager),

Address : Pune Techtrol Pvt. Ltd.

(O) S-18, MIDC, Bhosari , Pune-411026.

(W) J-52/7, MIDC, Bhosari, Pune-411026.

Phone Number : +91-20-66342900, 67313600

E-mail : ho@punetechtrol.com

Website : www.punetechtrol.com

Pune Techtrol Pvt. Ltd. will investigate all reported matters with discretion. Pune Techtrol Pvt. Ltd. shall not take any adverse action, as a result of such reporting, against anyone, who report in good faith what he or she believes to be genuine violation of this code.

Consequences of any violation:

Violation of this code may lead to any or all of the following action,

1. Written warning
2. Recovery of the losses/damages
3. Termination from service

Mayank Khatan (CEO)
Pune Techtrol Pvt. Ltd.

Last Updated on: July 2020 / Rev.0