EQUALITY AND INTEGRITY

OUR CODE OF CONDUCT

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OUR CULTURE Our Foundation for Accelerated Growth and Innovation

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OUR CULTURE
Our Foundation For Accelerated Growth and Innovation

- Compare ourselves to the Best in the Industry to adopt goodness and best Ideas with Innovative approach
- Decision making and Accept new Challenges
- Steady stream of fresh ideas and Innovation in technology
- Equality Integrity and Inclusion

COMMITMENT TO EQUALITY AND INTEGRITY

- No matter our position, department, or location, we never cut corners and always do the right thing. We comply with all applicable laws and follow company policies.

Our Code

At PACMA CONTROLS, we conduct business in accordance with all applicable laws and with the highest ethical standards. Our Code of Conduct helps us do that. It embodies our values and helps us maintain a work environment of respect, honesty, and unquestioned integrity. Asking questions and raising concerns is an integral part of a culture of integrity.

Our Code applies at all times to every PACMA CONTROLS Employee, including everyone employed by our subsidiaries and controlled affiliates, and our Board of Directors.

There are no exceptions: Our Code is enforced regardless of an employee's rank or position in the company. Failure to follow our Code or failure to report a known violation may lead to disciplinary action, up to and including termination of employment.

Your Role in PACMA CONTROLS

All PACMA CONTROLS employees must follow our Code, our policies, and the law. Our continued success rests on our ability to maintain the high standards of business conduct for which we are known.

Unethical behavior is wrong and can damage our reputation. In our transparent and digitally connected world, information about bad acts can become public in an instant. When faced with a difficult choice or ethical "gray area," ask yourself:

• Does this decision align with PACMA CONTROLS's values and ethics ? • Is it consistent with company policies, rules, and the law? • Could I defend my decision to the public?

If you can't definitively answer "yes" to these questions, STOP. Make a different choice or seek guidance from your manager, Human Resources. PACMA CONTROLS's integrity and business reputation are depending on you.

Make sure your actions always reflect our values.

Manager's Role :

Though all employees are personally accountable for following our Code, managers have the added responsibilities of leading by example, setting high expectations for conduct within their team, and being responsive to questions and concerns. All PACMA CONTROLS managers must: • Ensure that their team members read and understand our Code • Help team members understand how the Code relates to their jobs • Use the Code as a tool for discussion around work environment, team performance, and individual integrity • Maintain an open-door policy where employees feel comfortable asking questions and reporting concerns • Escalate and report allegations of misconduct and verify that swift and appropriate action is taken to address reported concerns • Ensure that employees who raise concerns in good faith are protected from retaliation

Question and Speak up & Reporting Concerns

Asking Questions and Reporting Concerns Acting with integrity means more than just holding ourselves accountable. It also means that we do not turn a blind eye to the concerning behavior or actions of others. We must be prepared to speak up immediately when questions or concerns arise. Misconduct affects all of us.

No Retaliation

No Retaliation PACMA CONTROLS does not tolerate retaliation. No employee should ever engage in any form of harassment or negative action that is meant to silence or punish others for speaking up in good faith or participating in an investigation. If you observe or are subjected to retaliation, report it to the Office of the Directors\ombudsman so that the situation can be investigated and corrected. Anyone who retaliates against an employee for speaking up in good faith might be subject to disciplinary action, including termination. Reports must be made honestly, fairly, and in good faith. Dishonest or false reporting is prohibited.

COMMITMENT TO EACH OTHER

At PACMA CONTROLS, our promise is that we expand human possibility – a promise that starts with our own employees. Valuing the diversity of our people and ensuring a safe, inclusive, and respectful work environment fosters greater trust, flexibility, creativity, and satisfaction within our company and community.

Workplace Safety

Workplace Safety Nothing is more important than the safety and security of our employees. We owe it to ourselves and our co-workers to maintain a safe workplace, avoid occupational injuries, follow all safety rules and regulations, and do all we can to protect each other from injuries. PACMA CONTROLS does not tolerate intimidation, threats, or violence in any form. Prohibited behavior includes: • Aggressive or hostile behavior that leads to emotional distress or fear of injury • Threatening remarks • Possessing a weapon on company property, in company-owned vehicles, or while on company business • Physical or verbal assault

Being safe means we… • Comply with all safety and health laws and procedures • Only perform work for which we are trained and competent • Do not use alcohol, illegal substances, or anything that could impair our judgment while on the job • Behave in a way that respects the physical and emotional safety of others • Report unsafe situations and all workplace accidents, injuries, and illnesses

Harassment

Harassment/Mobbing We are all entitled to a work environment of mutual trust and respect that is free from aggression, improper pressure, and intimidation. Our team works best when we consider how we treat each other and do not make derogatory remarks or engage in any harassing behavior. This doesn't mean that managers cannot hold employees accountable for their work, but it does mean that we will not harass or bully each other.

Mutual respect means we… • Do not make disparaging personal remarks • Never engage in mockery, humiliation, malicious gossip, bullying, or mobbing • Never engage in physical and verbal intimidation

Harassment in all its forms, including workplace violence and discrimination, is prohibited to maintain a workplace that is safe, secure, respectful, and inclusive for everyone.

Sexual Harassment

Sexual harassment is a form of harassment that involves unwelcome sexual comments or advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature that adversely affects an individual's employment opportunities, interferes with his or her performance, or creates an intimidating or hostile environment.

Harassment in any form undermines equality and adversely impacts the dignity and well-being of employees. It creates anxiety and stress for the targets of such behavior and can result in widespread loss of productivity, low morale, absenteeism, staff turnover, and legal action. PACMA CONTROLS has no tolerance for this conduct.

Privacy

Employee Privacy Business purposes often require PACMA CONTROLS to collect, use, and store employee personal data. Personal data may include: • Contact details, such as address or phone number • Identification details, such as Aadhar, driving license • Medical information • Financial information • Employment history • Background check data • Other data that an employee would reasonably expect to remain confidential We respect and protect personal data. This means we ensure that personal data is only used and collected for approved, legitimate purposes and that personal data is accessible only to people who have a justified need to know. It means we keep close track of the systems handling personal data while implementing appropriate privacy risk control measures.

Commitment to Clients and Partners

At PACMA CONTROLS, we solve customer problems – and we do so fairly and with integrity. We earn and maintain customer trust by being diligent, respectful, and honest.

Customers Data Privacy

Customer Privacy We are committed to respecting and properly securing the private information of our customers and our partners. Customer personal data relates to the personal data of people working for our customers and partners, which may include information such as: • Business contact details, such as name, title, address, email, and phone number • Marketing information, such as participation in conferences, seminars, and webinars, and logs of visits to websites and other social media, through cookies or otherwise • Operational information, such as operational data of operators at a customer factory where we install and maintain solutions or provide other services

As we do with employees data, we are committed to following all policies, procedures, and applicable laws when accessing, retrieval, collecting, using, storing, transmitting, and destroying customer's personal data.

Work to ensure that our customers and partners receive transparent information about the collection and use of their personal data • Secure the consent of customers and partners when using cookies and when we send marketing materials as required • Consider privacy risks when we collect personal data from or provide it to third parties.

Fair Competition

Fair Competition Fair competition is an essential part of the free enterprise system. It is our policy to compete fairly and to comply with all applicable competition and antitrust laws. We never seek to gain an advantage in the market by making unfair agreements with competitors, customers, or suppliers. Our channel partners are separate and independent entities; as such, we do not set their resale prices or control their business operations. Nearly all countries where PACMA CONTROLS does business have laws governing fair competition in order to protect customers and the free enterprise system. These laws are especially important in PACMA CONTROLS's business environment because we often work with distributors, systems integrators, or other value-added partners, and we sometimes team with our competitors to provide packaged solutions for our customers. This ecosystem can make complying with all of the rules tricky. Whenever you have questions or concerns about how to proceed, be sure to consult with a company lawyer.

Working with fellow partners

We pride ourselves on our integrity, and we choose to deal with partners who hold themselves to similarly high standards. We believe that working with ethical partners is critical to our ongoing success and good business reputation.

Select our partners fairly, based on quality, service, efficiency, and price • Work with our partners to prohibit bribery and corruption in business dealings with or on behalf of the company • Investigate any potential partner's reputation for ethical conduct • Perform periodic monitoring of partner businesses' ethics.

Commitment to PACMA CONTROLS

At PACMA CONTROLS, we are truthful and transparent in our pursuit of excellence. We show our commitment to each other and the company by taking our roles and responsibilities seriously and by acting ethically in all of our dealings.

Personal Relation and Conflicts of Interest

We have an obligation to our customers, suppliers, and shareowners to ensure that business decisions are based only on quality, price, delivery, reputation, and experience.

A personal conflict of interest refers to situations in which an employee's personal relationship threatens to impair the employee's ability to act in the best interest of the company. The most common personal relationships that can influence your judgment are the ones with close family and friends. And it's not the type of relationship that creates the problem, but whether the relationship causes you to put the interests of the family member or friend before your obligations to PACMA CONTROLS.

Gifts and Hospitality

We conduct business purely on business considerations. We must be cautious when giving and receiving gifts and hospitality so that they do not become – or appear to become – a means to improperly influence a business decision or gain an unfair advantage. While the modest and reasonable exchange of gifts and hospitality in the business world is customary and allowable, employees must exercise good judgment to avoid the appearance of bribery or a conflict of interest.

In order to minimize risk, any gifts or hospitality we give or receive must be:

- Connected to a business purpose
- At a suitable time and place
- of a nominal value
- Infrequent
- Unsolicited
- Non-monetary (i.e., not cash or a cash equivalent, such as gift card)
- Properly documented

Provide only small and customary gifts and never expensive or lavish ones • Provide only routine business entertainment such as lunches, dinners, or casual sporting events and never provide entertainment that is excessive or inappropriate • Never accept any gift or hospitality that creates a sense of obligation or compromises our professional judgment or impartiality

Sensitive Information

Company information and data is a company asset that can only be used for business purposes, and it cannot be taken or used by employees outside of work. In addition, at PACMA CONTROLS, we often work with restricted and confidential information owned by the company and others, such as trade secrets, customer data, business strategies, financial statements, research and development plans, and other nonpublic business information. It's critical that we protect sensitive information from misuse, theft, or loss. The unauthorized use or disclosure of sensitive information could compromise customer trust in our company and may result in criminal penalties. Similarly, we must ensure that we do not obtain or use confidential information of third parties without authorization.

Only store, share, or handle confidential or restricted data in an approved and authorized manner • Do not disclose confidential information to any third parties unless the disclosure is properly authorized • Follow all obligations under confidentiality agreements with PACMA CONTROLS or other companies • Place appropriate labels (for example, "PACMA CONTROLS Confidential") on sensitive company documents • Do not use company information for personal benefit or share it with others.

Data Privacy and Security

Follow all data security policies, standards, and procedures to keep data secure • Download or store PACMA CONTROLS data only on authorized devices • Report any potential data breach immediately.

In order to safeguard sensitive information in our possession, PACMA CONTROLS may monitor employee data and system use for indications of mishandling or compromise. There is a process in place to review employee use of our systems when warranted and in accordance with local laws and regulations.

We protect our data by following our data security policies, including our Information Security Policy and Safeguarding Sensitive Information Policy, and we take all security processes seriously so that we might protect our data and that of our customers and partners.

We protect our intellectual property to shelter the innovations of our employees. Additionally, intellectual property safeguards help us protect our customers by ensuring that our products are safe, authentic, and reliable.

Anti-Corruption We win business with our superior products and customer service. We do not cut corners, give or receive bribes, or engage in corrupt activities. We also don't allow partners or third parties to bribe on our behalf.

We respect and support the dignity of all our workers, and we uphold human rights by providing working conditions that are fair, nondiscriminatory, equitable, and safe.

We follow all applicable labor regulations and laws • Don't allow or tolerate any form of forced labor, slavery, human trafficking, or child labor • Provide equal employment opportunities and prohibit illegal employment discrimination • Prohibit the use of corporal punishment, mental or physical coercion, and verbal abuse • Oppose all exploitative working conditions • Are alert to any signs of abuse or coercion within our operations or supply chains and speak up if we see or suspect possible labor or human rights violations.

Office Information

What happens when I contact the Ombudsman? Your resource for reporting wrongdoing or asking advice How do I contact the Ombudsman?

EMAIL: ombuds@pacmacontrols.com
MAILING ADDRESS: PACMA CONTROLS
Paigambarpur West, Salon
Distt. Raebareli, U.P. 229127
INDIA

PHONE NUMBERS : +919958457904

If you ask for advice, you will receive it. You can remain anonymous. Your report of an actual or potential violation of our Code of Conduct will be investigated and addressed. Your good faith report of an actual or potential violation of our Code of Conduct investigated and addressed.