

Code Of Conduct & Business Ethics

CODE OF CONDUCT

FOR EMPLOYEES

Any employee found Indulging in any of the following Acts/Behaviors or any such conduct which is not in line with the values of our Company will be in violation of our Employees' Compliance Code.

Such actions can be reported by anybody against any employee/business partner through

a) email - ethics@pdsltd.com

b) the NAVEX https://pdsltd.com/ethics-hotline/c) the "NAVEX Global Hotline" link from website www.pdsltd.com;

d) the hotline (using land phone) toll free # 157-0011; e) prompt dial # 8557199497.

Bribery.

Disclosure of confidential documents.

- Misappropriation of company assets in any form- Intellectual or otherwise.
- Falsification of records.

Carrying out any commercial or financial activities in competition with the Company's business including suppliers, customers & service providers of the Company.

- Sexual harassment by either sex.
- Violation of sourcing conduct and the ZTV policies.

Any act by any employee which is against the policies and principles of the Company.

• For further details please read the document on EMPLOYEES' COMPLIANCE CODE.

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FOR VENDOR SELECTION

We value the fact that all the operations of the Company are characterized by honesty, transparency, integrity and fair play. It will be our earnest endeavour to meet all the aspects of our Buyers' Code of Conduct. We will only work with such factories which are approved by our buyers. In addition to that we explicitly state our expectations on our **ZERO TOLERANCE POLICY** below which will also be part of our sourcing guidelines while engaging factories as business partners. We follow a strict Zero Tolerance Vendor (ZTV) Policy on:

- Child labor.
 - Forced labor in any form overt or covert.
 - Discrimination in any form.
 - Harassment and Abuse.

Unauthorized subcontracting including Tier 2 operations regardless of brands.

Failure to provide access to records or workers; interview or any mode of denial that will hamper the social Compliance audit process.

Shared building unless approved by Head of Compliance (any other factory owned by different owner located in the same building) or factory located in building which has shops/markets or buildings approved for residential purpose.

Health endangerment & Environmental Safety issues.

Building Structural Soundness Standards & Fire Safety

Issues

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Any unethical practice.