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5.6. COMPETITION

5.6.1 Competition Law

The Company, its subsidiaries and associate companies have a policy that all business activities are carried out in full compliance with competition laws – the laws which prevent anti-competitive behavior. Competition law prevents us from carrying out any activities that restrict competition and makes illegal activities such as price fixing, unfair pricing, market sharing and refusal to supply customers.

5.6.2 Our commitment

We are committed to winning and keeping customers in an open, competitive and legal manner. Any failure to comply with competition laws could have serious adverse consequences for the Company and its employees.

5.7 MONEY LAUNDERING

5.7.1 Money Laundering

The Company aims to maintain our high standards of conduct by preventing criminal activity through money laundering.

5.7.2 What is money laundering?

Money laundering involves turning the proceeds of crime into apparently innocent funds with no obvious links to their criminal origins. There is no threshold for the criminal activity and it covers the proceeds of any crime, including terrorist activities, drug trafficking, criminal breach of environmental legislation and health and safety and planning legislation.

5.8. RESPECT FOR HUMAN RIGHTS

5.8.1 Universal Declaration on Human Rights

We support the belief that human rights are universal and adhere to the principles of human rights in our operations. We support the United Nations Universal Declaration on Human Rights and work hard to ensure that in all areas of interaction with our employees, clients, suppliers, third parties, interviewees and joint venture parties that everyone is protected and treated absolutely fairly.

5.8.2 Diversity

The Company respects and embraces diversity and expects its employees, suppliers and business partners to do the same.

5.8.3 Training Programme



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As applicable, our people are required to undertake health and safety and equality and diversity training programs. Training is provided to all on ethical practices by the management either by external faculty or by internal faculty.

5.9 Embezzlement: Embezzlement is an act of theft or misappropriation of funds placed in the trust of someone such as funds belong to employer. Although such person is lawfully in possession of the fund, if they move the fund to some other account for their own personal use, it could be considered embezzlement.

5.10 Extortion: Obtaining money and property by threat to a victim's property or loved one's intimacy, or false claim of a right. Obtaining of property from another, with his/her consent, induced by the wrongful use of actual or threatened force, violence or fear.

The Company believes in zero tolerance policy on Embezzlement / Extortion. It encourages its employees, stakeholders not to get afraid of any such acts. Report the matter to HR in case of any such threat. HR will arrange to enquire the matter. On getting any clue on such matter, any employee or stakeholders should report and he/she shall be suitably rewarded.

5.11. LAW AND REGULATION

5.11.1 Law and Regulation

The Company respects the rule of law in all of our dealings and has as a minimum standard compliance with all laws and regulations which are applicable to the Company's businesses. The Company believes that it should act as a responsible citizen of India and engage along with public in promoting, advising, influencing the regulatory policies for the welfare of the community at large.

5.11.2 Consequences

Failure to comply with the law and regulation will place the Company and its people at risk and result in potentially significant legal, financial, reputational and personal consequences.

5.11.3 Training Programme

The Company develops training and compliance programmes for those of its people who can best ensure compliance with relevant legal issues. All employees selected for inclusion must attend a training session periodically when called upon to do so by the Company.

5.12 REPORTING, DISCLOSURE AND WHISTLE BLOWING

5.12.1 Responsibility

Every person of the Company has a responsibility to protect the Company's assets, including information and goodwill as well as property. The Company encourages its people to raise genuine concerns about malpractices at the earliest possible stage and in the right way. The Company has in place a separate policy on Vigil Mechanism.

5.12.2 Concerns

Concerns will be treated seriously and investigated appropriately; where possible you will be kept up to date with progress.

Policy adopted on 17th March 2022

Policy review on 23 May 2024



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5.12.3 Reporting

If you have a concern about malpractices you should use the option you feel most comfortable with to raise concerns.

DISCLOSURE

This Policy shall be disclosed on the Company's website at www.pclindia.in. Web link thereto shall be provided in the prescribed reports under Companies Act 2013 or SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.

AMENDMENT AND UPDATES

The Board shall have the power, subject to applicable laws, to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy. The Company Secretary being the Compliance Officer is also authorized to make amendment in this policy, where there are any statutory changes necessitating the amendment in the policy. The Board may also establish further rules and procedures, from time to time, to give effect to the intent of this Policy and further the objective of good corporate governance.

Sd/-

Yatin S. Shah
Chairman and Managing Director