



TECHNO ELECTRIC & ENGINEERING
COMPANY LIMITED

Code of Conduct for Employees

Techno Electric & Engineering Company Ltd has always endeavored to achieve the highest ethical standards in its conduct of business. The company's reputation and goodwill are recognized and valued as its most important asset, which warrants the faith and trust of its various stakeholders.

Working by Techno philosophy means, the employee must always act with integrity to ensure that we are trusted by our suppliers, subcontractors, customers, business partners, and the communities in which we operate. This Code of Conduct is designed to formally put these corporate values of Techno Electric into practice. The purpose of this Code of Conduct is to articulate high standards of honesty, integrity, ethical, respect for all individuals, social and environmental responsibility and law abiding behaviour of all employees while meeting the requirements of stakeholders.

The Company philosophy sets out our Core Values in terms of how we work, so we can be admired by our customers, Contractors/Suppliers, the people and the communities we work within.

1. Scope:

The Code of Conduct is applicable to employees of Techno Electric and also to all individuals/ interested parties directly or indirectly associated with Techno business line, in essence, anyone representing Techno or working on the Company's behalf is expected to act consistently with the Code.

2. Responsibilities under the Code:

We expect everyone who represents the Company to uphold the same standards and to abide by our Code and policies. All employees should keep in mind that any violation of the Code of Conduct values, principles or rules is a serious matter which could have damaging consequences and may also adversely affect the reputation of our organisation. All Techno managers must also strictly apply and comply with the Code of Conduct Guidelines/Internal Policies and Procedures. They have an additional responsibility to drive a culture of integrity, honesty, ethical and law-abiding behaviour among other employees in the organization.

3. Our Core Values:

A. Integrity and Ethics:

- We behave in an ethical manner and act in good faith with honesty and fairness
- We deliver our services based on clearly established contracts and well defined actions
- We follow company policies and procedures o We respect confidentiality of business and personal information,
- We provide information, instruction and training as may be necessary to ensure health and safety.



B. Impartiality:

- We deliver professionally with respect to our assignment.
- We provide accurate data/report to our customers, suppliers, colleagues and stakeholders in line with our best practices.

C. Respect for all Individuals:

- We treat others the way we would like to be treated,
- We always consider how our actions will affect others.
- We recognize and value individual contribution and we give accurate and constant feedback on individual performance,
- We respect differences, care about others and do not discriminate against others on the basis of nationality, ethnic origin, age, sex or religious or political beliefs.
- • We respect each other and uphold the spirit of team work and ensure that the best interest of the team and Company prevails at all times.

D. Social and Environment Responsibility:

The growing commitment of Techno Electric and of its employees to social responsibility creates new challenges to combine profitability and accountability. We all respect the community, people and the environment in which we live and work and we always consider the impact of our actions upon the community, people and the environment.

4. Our Key Principles:

A. Rigorously apply our Code of Conduct:

Our development and our growth are also built on our core principles which apply, without any exceptions, to all Techno employees and business partners. Clients, subcontractors, and suppliers. The application of our Code of Conduct ensures the ethics of our day-to-day business. Each Techno manager and employee must know and apply our Code of Conduct.

B. Our conduct must always be governed by the principles of Transparency, Honesty, and Fairness:

Many activities are not the subject of laws, regulations or other mandatory requirements. In such cases of principles of transparency, honesty and fairness will conduct and influence our course of action, whenever laws or regulations do not clearly state what we should do. It is the responsibility of each Techno employee / manager to examine each situation against the requirement. No employee may act in a manner which infringes our values principles or rules of our Code of Ethics, on the grounds that it is in the interests of the Company to do so.



C. We are committed to comply fully with the laws and regulations of the local Government (State/UT/Country) in which we operate:

The reputation of Techno Electric for integrity is built on its respect for, and compliance with, those laws, regulations or similar mandatory requirements, that apply to the conduct of its business. It is the personal responsibility of each Techno employee to comply fully with the laws and regulations of the local bodies in which he or she performs a service.

D. Fighting Bribery and Corruption:

Techno Electric is fully committed to fighting all forms of bribery and corruption. We follow Zero tolerance policy for bribery and corruption or facilitation payment in any form of dealings. No employee of Techno Electric shall, in the course of his or her duties, solicit or accept, whether directly or indirectly, any bribe from any person. The promise, offer, solicitation, payment or acceptance of any bribe is a violation of Techno policy, may be a criminal offence and will lead to appropriate disciplinary action including potentially having his or her employment contract termination. We are also committed to encourage anti-bribery and anti-corruption practice amongst everyone working on behalf of Techno Electric.

E. Integrity of Financial and Accounting Documents:

All financial and accounting information must be duly and correctly recorded in Techno Electric books and accounts and should, in no case, be the subject of incomplete, erroneous or fraudulent treatment. All entries must be justified by the appropriate particulars of proof, in good faith. All documents must be stored in accordance with the applicable laws and Techno guidelines.

F. Conflicts of Interest:

- All employees of Techno Electric should conduct themselves in the best interest of the company at all times.
- An employee of Techno should not accept concurrent employment outside the company, with or without remuneration. This includes undertaking any consulting assignment, freelancing, directorship, or any position of responsibility. In case an employee intends to undertake any concurrent opportunity outside the company, prior approval from MD is required.
- An employee shall not employ a relative in the same department or in a position of financial influence.
- Any other situation that hampers an employee's ability to take business decisions in the best interest of the company. Each employee must fully and frankly inform the Company of any personal or external business interest that may lead to an actual or potential conflict of interest or duty. In addition to this, employees must not exploit for their own personal gain the opportunities that are discovered through the use of corporate property, information or position.



G. Observance of Confidentiality Rules:

i) Protection of the Confidentiality of Information:

All information received in the course of the provision of our services must be treated as, and must remain, strictly confidential, subject to authorized release. All Techno employees are personally committed to protect the information in their possession, and to ensure that it is kept confidential by employees working under their control. Techno employees remain bound by these confidentiality obligations even after leaving their jobs. Everyone should ensure that the protection of such confidential information is secured by implementing adequate security measures, ensuring that access is restricted to authorized persons only, and that the documents are stored in designated secure areas and disposed in a secured manner.

ii) Intellectual Property Rights and Trademarks:

Technical, commercial and financial information, software, methodologies, trade secrets, databases, knowhow developed or acquired by Techno Electric and information governed by non-disclosure agreements must be treated as (and must remain) strictly confidential. The use of such information must be restricted to permitted professional purposes, to the exclusion of personal purposes and should be shared with or given to authorized persons only.

H. Compliance with the Code of Conduct Principles and Rules:

Compliance with the Code of conduct principles and rules is included in the annual evaluation of each Techno employee. Each employee shall have the opportunity to provide input on the development of the Code of conduct during induction training sessions or review meetings. Any employee who fails to comply with the Code of Conduct shall be subject to disciplinary measures which may include the termination of his or her contract of employment. In all cases, the initiator of any violation shall in any case have the right to be heard and to defend himself or herself before a disciplinary measure is imposed. If a Techno employee believes in good faith that a rule or one of the principles laid down in the Code of Conduct policy has been or is about to be violated, he/she should inform his/her superior, or Company ED/Director/MD.

I. Applicable Rules:

i) Equal Opportunities for Employment:

Techno Electric is an equal opportunity provider and does not discriminate against any person because of their gender, caste, religion, age, marital status, nationality, ancestry, ethnicity, geographical origin, sexual orientation, disability or any other trait protected by law, with respect to any terms of employment such as hiring, promotion, transfer, compensation & benefits, career development opportunities, etc. It is expected that managers shall take employment related decisions based only on the merit of the person and not discriminate against any person because of their personal characteristics/traits.



ii) Workplace free of Harassment:

Techno Electric recognizes and respects the right of every employee to a harassment free workplace. Hence, employees are expected to ensure a healthy, safe and conducive work environment that is free from harassment of any kind or form. The Company sets a standard of 'zero tolerance' for harassment. We are all responsible for ensuring that we avoid actions or behaviour that are, or could be, viewed as harassment. The Company views all incidents of 'sexual harassment', very seriously and encourage employees to report any incidents of sexual harassment to the Internal Complaints Committee (ICC) in line with our Prevention of Sexual Harassment (POSH) Policy (Policy No. TEECL/POSH/01 Rev.01). POSH Committee formed under Sexual Harassment of Women at Workplace (Prohibition, prevention and Redressal) Act 2013.

iii) Workplace free from Violence:

Techno Electric will not tolerate workplace violence in any form either within premises or outside where company related activities are carried out. Employees are expected to not indulge in workplace violence. They must not encourage others towards it as well. Employees are also prohibited from possessing weapons or dangerous items at workplace or outside while conducting business activities.

iv) Office Decorum:

All employees should:

- Respect the organization to expect the same in return >> Be punctual and reach office on time.
- Leave all personal problems out the moment when step in the office.
- Be sober and greet fellow workers/colleagues with a smile.
- Follow the professional dress code in office and during meeting with clients/ stakeholder

v) Substance Abuse:

All employees should maintain an alcohol and drug-free environment at workplace and refrain from substance abuse of any form while performing their official duty within premises or outside of it. Techno reserves the right to invoke disciplinary measures which may include suspension or voluntary referral for rehabilitation under Substance Abuse Policy (Policy No. TEECL/SAP/01 Rev.01)

vi) Open Door Communication:

Techno Electric believes that the work environment should be free from any kind of bureaucracy and all employees must have access to other employees regardless of their position or influence in the company. All managers are expected to foster an open door culture at the workplace.

vii) Prohibition of Child Labour:

Techno Electric strictly prohibits the employment of child labour at its project sites and offices. All employees at Techno responsible for hiring of staff are required to ensure that this principle is upheld.



viii) Environment, Health & Safety:

Techno Electric committed to provide its employees a safe, healthy, and sound working environment. The company will take all possible measures to ensure health and safety of its employees. Safety at workplace is also every employee's responsibility. All employees and visitors to the workplace must comply with Safety norms/ policies/ standards as prescribed by the company and applicable law.

ix) Personal Information Privacy:

Techno Electric is committed to protecting personal information that is shared by employees during the course of employment, consistent with applicable data privacy laws. It is expected that employees under HR/Personnel department whose job responsibilities include the personal data collection, transfer, processing and storage of employee records will comply with the applicable data privacy laws and other internal controls that protect this personal information.

x) Confidential Information:

Unless authorized by Company's management, employee shall not disclose confidential business line information or allow such disclosure. Employees must use their best efforts to avoid unintentional disclosure by applying special care when storing/recording or transmitting confidential information.

xi) Protection of Company Assets:

Every employee must ensure appropriate use of company assets including company capital goods, computers, communication systems etc. The, misuse or destruction of company assets shall be considered as misconduct and strict disciplinary action shall be initiated in such cases.

xii) Usage of Interest Email:

Every employee of Techno must adhere to the following guidelines while using internet and email:

- Not send offensive emails and messages to any person / group within or outside the company.
- Not import any non-text files including files received as e-mail attachments onto your system without checking for viruses.
- Not visit obscene or illegal material or any material that is offensive in any way.
- Not download any unauthorized software. All software used by employees to conduct Company business must be appropriately licensed.
- Not share any report, files, data or source code with any unauthorized person/group/organization through the internet.
- Not use the email system to copy and / or transmit any documents, software or other information protected by copy right laws.



J. Code of Conduct towards Customers & Suppliers:

- i) Techno Electric recognizes service integrity, job quality and being safe and environmentally responsible are the founding principles of its performance. Therefore, the Company is committed to ensuring that its EPC contract adhere to prescribed quality standards and that technologies used are safe and environmentally responsible across the project cycle, including its usage by the intended customer.

ii) **Customer and Vendor Relationships:**

Techno Electric recognizes that customers, vendors and other business partners play a crucial role in the success of the company. Hence all employees must seek to maintain relationships of mutual respect and trust with them at all times, all contracts must be fairly negotiated and free of deception or inaccuracy. Further, when selecting vendors and subcontractors to provide products or services or to work on Techno behalf, it must be ensured that selections are made fairly based on a proper weighing of all the facts, which include quality, safety, technical ability, historical experience, reliability, cost and schedule and not in a biased manner or for inappropriate/illegal reasons.

K. Amendments:

Techno Management is committed to continuously reviewing and updating its policies and procedures. Therefore, the company reserves its right to amend/alter this policy at any time and for any reason, subject to management decision.

Note: This Code of Conduct lays down only the general principles. The company may have separate codes/policies formulated for regulating various matters that may be required under the specific laws.

Ankit Saraiya
(Chief Executive Officer)

Policy	Version	Adopted	Revised
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