CODE OF CONDUCT POLICY FOR EMPLOYEES

PNB HOUSING FINANCE LTD.

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1. Employee’s Code of Conduct

1.1. Purpose

The code of conduct defines how an organization's values and principles are linked with standards of professional and social conduct of its employees. The code is an elaboration to the existing HR policy and articulates the values the Company (Company here is defined as PNB Housing Finance Limited.) wishes to foster in its leaders and employees, while doing so, defines the desired behaviour. Additionally, a code is a central guide and reference for employees to support day-today decision making and empowers employees to handle ethical dilemmas that they may encounter in their everyday work, and in their social conduct. This code of conduct shall be read as forming an integral part of PNB Housing Finance Limited Disciplinary Policy.

Failure to comply with this code, the policies and applicable laws and regulations will be viewed as a serious violation of your terms of employment and may result in disciplinary action, upto and termination of employment.

1.2. Objective

The key objectives of the Code of Conduct are:

1. To establish professional business standards and ensure adherence to the highest standards of honest and ethical conduct, including proper and ethical procedures in dealing with actual or apparent conflicts of interest between personal and professional relationships.
2. To ensure compliance with applicable laws, rules and regulations
3. To address misuse or misappropriation of the company assets and resources
4. To retain the highest level of confidentiality of customer/client information and promote fair dealing within and outside the company.
5. To prescribe procedures to be followed in case of conflicts of interest or in case of receipt of gifts or fraud.
6. To focus on customer centricity, convenience to customers, appropriate governance and controls and sustainable growth while adhering to the Code of Conduct
7. To define the disciplinary procedures and reporting in case of violations or deviations from the policy

While this Code covers a wide range of business practices and procedures, these standards cannot be deemed to cover each and every procedure. If the Company employees face any situation wherein, they face a legal, moral or ethical dilemma in which there is no specified action to be taken, they may approach their respective HR, or their senior authorities as elaborated in this policy document.

1.3. Think It Through

a. Will this activity or relationship influence, or appear to influence, my ability to make sound and unbiased business decisions or otherwise interfere with my ability to do my job?

b. Will I personally gain something or will a family member benefit from my involvement in this activity based on my status as an employee of PNB Housing Finance Ltd.?

c. Will I be using Company assets for personal gain?

d. Will public disclosure of an activity harm the reputation of PNB Housing Finance Ltd.?

If the answer is “yes” to any of the above questions, discuss the situation with your manager or ask for help.

1.4. Ethical Business Practices

a. Every employee shall take all possible steps to ensure and protect the interest of the Company and discharge his/her duties with utmost integrity, honesty, devotion, sincerity and diligence.

What should I do?

Q: One of my close friends works with a competitor. Occasionally we talk about internal plans/ upcoming changes/financial progress/impending issues/solutions etc. of the organization. Should I be concerned?

A: Yes. You are revealing confidential information of the Company. You also may be violating Code of conduct & competition law that bans discussions of marketing/ pricing / internal practices of the organization.

What should I do?

Q: Employee “A” estimated that he would not be able to meet his deadlines for the month. To make up the difference, he falsified the information pertaining to one of the business partners to get the case approved. Is it correct?

A: No this is not correct as in order to make up the difference, employee breached the Code of conduct.

a. Employees shall not offer directly or indirectly anything of value (such as bribe/ gratification) to any customer or government official to influence a reward or action in favour of the Company. A business courtesy, such as gift, contribution or entertainment should never be offered under such circumstances that might appear to be improper, nor should the same be accepted by an employee from such agencies, customers or industry/sector colleagues/vendors etc.

What should I do?

Q: One of the senior employees of a competing company reached out to me to discuss the information that is confidential in nature i.e., pricing/new product/Internal strategy and metrics of our business. Am I supposed to discuss?

A: You should not discuss with competitors about the price/new product/business strategy or other proprietary information. If you receive a call from a competitor, or if someone unknown approaches you to discuss any price sensitive information, make it clear that you will not discuss the same. Politely end the conversation and report the incident to the Compliance Head and to your reporting manager.

a. No one shall incur, authorize, pay or transfer any obligation from the Company’s funds without full, accurate and specific recording of the actual purpose. No one shall make false claims record false sales, understate or overstate known liabilities or assets or make entries that hide or disguise the true nature of any financial transaction.

b. Refrain from any involvement in criminal or unethical/immoral activities, activities that contravene human rights, or activities that compromise the image and interests of the organization.

What should I do?

Q: We have just closed an important deal with a new customer. My team member has suggested that we take him to a club to celebrate. I thought that was a good idea – until I discovered it was a dance bar and encourages prostitution/administration of drugs. I feel uncomfortable about being offering this type of entertainment. Am I being over-sensitive?

A: Entertainment offered to customers/colleagues should not only be reasonable but also acceptable. This type of club/entertainment is against the moral ethos and values of the Company. Any act of immoral activity is strictly prohibited as per company's code of conduct and should be followed in writing and spirit both.

a. Do not disclose non-public information to anyone outside the Company, including to family and friends, except when disclosure is required for business purposes. Even then, take appropriate steps, such as execution of a confidentiality agreement, to prevent misuse of the information.

b. Do not disclose non-public information to others inside the Company unless they have a business reason to know and seek approvals the immediate manager.

c. Employees are always obligated to protect the Company's non-public information, including outside of the workplace and working hours, and even after employment ends.

What should I do?

Q: I have learned that the Company is considering the acquisition of a small, publicly traded housing finance Company. May I acquire the stock of this company in anticipation of the acquisition?

A: No. Trading on material non-public information is illegal and a violation of the Code, whether you are trading in the stock of PNB housing or the stock of another Company.

a. Sharing of UPSI (Undisclosed price sensitive information) is allowed on need basis for legitimate purpose like sharing for audit purpose, stake sale or with any consultant.

b. Employees are always obligated to protect the Company's non-public information, including outside of the workplace and working hours, and even after employment ends.

What is unpublished price sensitive information?

Unpublished price sensitive information (UPSI) is an information which is not in the public domain and may have an impact on price of stock of the company if comes in public domain.

Examples of UPSI are quarterly/ yearly financial results, any merger/ amalgamation, any fundraising activity (Right issue/ Bonus issue), change in any Director, KMP & Management, any other critical business data.

a. Insider Trading: Trading in stocks or securities based on material non-public information, or providing material non-public information to others so that they may trade, is illegal and may result in criminal prosecution. Refer to the Insider Trading Policy for additional information.

b. Trading Window is generally closed at the time of adoption of quarterly/ annual results. However, it can be closed at any other event as well. Do not trade during closure of trading window. Employees are advised not to trade during closure of trading window.

What should I do?

Q: Employee "A" is new to share market. Seeing the market dynamics, he decides to sell some shares of PNB Housing while the annual results were to be disclosed in coming week. Has he complied with the trading window?

A: No, one should not trade during the closure of the trading window.

What should I do?

Q: Employee "A" buys shares of PNB Housing Finance Ltd. from the market, and decides to sell these shares in the market before 6 months of purchase of the share? Is Employee "A" fulfilling compliance requirement?

A: No. this is against contra trading. Employee cannot buy or sell shares within 6 months from the date of purchase or sell, only ESOP sale and buy is exempted.

a. Avoid contra trading for at least 6 months.

b. Refrain from giving/providing access card to any other person to mark attendance on your behalf.

c. An employee should never use personal funds, ask contributions from reportees/ colleagues or resources to do something that is not permitted by the bank.

d. Employee shall ensure that they should abide by the rules and conditions framed under AntiBribery & Anti-Corruption Policy of the PNB Housing.

What should I do?

Q: During my tenure with PNB Housing I have created multiple templates / documents related to my job profile, can I send those to my personal email ID?

A: No. Any information, template or document which has been created during your tenure with PNB Housing is considered as property and proprietary to PNB Housing. Employee should not send or request to send this information to his / her personal email address.

1.5. Conflict of Interest:

Employees are responsible for managing their personal interests in such a way that they do not profit improperly from their position at PNB Housing, nor do they allow these to give rise to conflicts of interest that negatively impact upon PNB Housing, its clients or the financial markets in which PNB Housing operates. When an employee encounters a personal, business related or other types of conflict of interest in conducting their role at PNB Housing, they must disclose it promptly to their immediate line manager who will consult with relevant risk stewards, including Compliance, to appropriately manage it. Conflict of interest may arise due to the following reasons:

a. Each employee is expected to avoid situations in which his or her family members' financial or other personal interests or dealings are, or may be, in conflict with the interests of the Company.

b. Employees are advised not to engage in any other business, commercial or investment activity that may conflict with their ability to perform the duties with integrity towards the Company. Employees must also not engage in any other activity (cultural, political, recreational, and social) which could reasonably conflict with the Company's interests, reputation and image.

c. Employees must not use Company's property, information or position, or opportunities arising from these, for personal gains or to compete with or to tarnish the image of the Company.

d. Employees should not engage in any business activity, which could be detrimental to, or in competition with, the Company's business activities (any).

e. All Employees must avoid situations in which their personal interest could conflict with the interest of the Company. If, under any circumstance, employee's personal interests' conflict with those of the Company's, in all such cases the employee must seek advice from his or her reporting/ reviewing manager or the HR manager.

What should I do?

Q: I have a relative / a very close friend I would like to hire him/her as a vendor. Since it is a legitimate work that needs to be done, and my relative/friend is trained to do this type of work, is it okay for me to hire him/her?

A: Although the work is legitimate, this situation creates the appearance of a conflict. The circumstances of this situation should be raised to HR Department so that an independent review can be done prior to committing to a contract.

What should I do?

Q: Over the period with real estate developer "A" you have developed friendly relationship.
Developer "A" has promised you to sell a flat / property at a discounted rate, in exchange of a favour.

A: Business opportunities discovered through your work here belong first to PNB Housing, except as otherwise agreed to by PNB Housing. Employee should refrain from accepting such favours and should bring such instances to the notice of HR Department and your line manager.

What should I do?

Q: One of our customers has asked if they can pay through a mix of different accounts, using a combination of cash and cheques. Is this acceptable?

A: You should be especially careful with these sorts of transactions. It could be money laundering, a process in which funds obtained through illegal means (e.g., drugs, bribery and prostitution) are concealed, or made to look legitimate. So, you should always inform your manager/HR before accepting payment and take all possible steps to satisfy yourself that this is a bona fide transaction. Among the danger signs to look out for are- attempts to make payments in cash; payments made by someone who is not a party to the contract; payments to and from an account other than the one used in the normal business relationship; and requests to make an overpayment.

What should I do?

Q: One of the customers during the loan sanction request has offered to reduce the rate of interest and is luring me by giving some amount in cash or cheque or transfer in my or my family member's account. Is this acceptable?

A: This is an indirect way of bribery. You should refrain yourself from any such benefit and simultaneously inform your manager before sanctioning the loan to that customer. The employee supervisor needs to do proper due diligence when any such case is reported before sanctioning the loan.

Do Remember

If you have a personal or financial relationship with any developer/vendor/service provider of PNB Housing, for which you have work-related responsibilities you must disclose that relationship to the HR Department in writing and recuse yourself from any decision-making regarding that service provider.

1.6. Gifts and Entertainment

PNB Housing Finance does not permit the offering or accepting of gifts, entertainment or attendance at business events, unless they are reasonable, proportionate and for a legitimate business purpose.

Avoid setting up circumstances that could lead to a conflict of interest, split allegiance, or the appearance of an inappropriate attempt to sway business judgements.

a. Unauthorized receipt, whether directly or indirectly, of any profit, commission or gifts which may be construed as a bribe arising from contacts made during the course of employment will be regarded as a major misconduct.

What should I do?

Q: You have gone for a loan property discussion with a customer and the customer is in the business of hospitality and offers you a free holiday package. Should you be accepting such offer?

A: No. you should never accept any kind of gratification from any person with whom you have business and professional relationship.

a. Accepting and giving of money, gifts, entertainment, personal loans or any other benefit or preferential treatment from/to any existing or potential customer, channel partners, vendors and business associate of the Company, is strictly prohibited. Occasional gifts of modest value as part of customary business practice may be accepted as an exception (not more than INR 1000/-).

What should I do?

Q: One of the empanelled vendors, takes me to lunch at least twice a month. Is that okay?

A: You may occasionally accept the invitation if you are meeting for a business purpose, but frequent or extravagant meals can appear to create a conflict of interest. Consult your manager/ HR if a vendor/builder/customer etc. constantly invites you.

a. As a general principle, gifts of minor estimated value (e.g., sweets, pens, desk diaries) are acceptable. Where the estimated value of the gift is over INR 1000/-, such gifts should be declined. However, in case of a doubt, the employee must refer the case to his/her HR manager, who will decide on the action to be taken.

What should I do?

Q: An employee who was managing the Company's relationship with a travel agency accepted from the agency discounted rates for personal travel that were not available to other employees. Is it as per code of conduct?

A: No. As the employee violated the Code provision of conflict of interest by accepting this personal benefit.

1.7. Absence from place of work

a. No employee shall absent himself/herself from his/her duty or be late in attending office or leave the station without having first obtained permission of the authority empowered to sanction leave except in unavoidable circumstances where availing of prior permission is not possible.

b. Late coming to office beyond 9:45 AM (IST) more than three times a calendar month will mean to one day loss of pay.

c. No employee shall ordinarily absent himself/herself in case of sickness without submitting proper medical certificate except in case of temporary indisposition. In such cases production of a medical certificate may be at the discretion of authority empowered to sanction leave, be dispensed with.

d. Habitual absence from the place of work or habitually overstaying the sanctioned leave without permission or sufficient cause will attract disciplinary action. Abstaining from place of work, during office hours, without prior notice and in knowledge of line manager will be construed as breach of conduct.

1.8. Conduct during office hours

a. As a team member and representative of PNB Housing, employees should always value and support one another. We believe everyone in our team is important and deserves respect.

b. At PNB Housing, all employees will treat one another with fairness and dignity; discrimination, harassment, or intimidation will not be tolerated.

c. Employees should not participate in any activity detrimental to the interests or reputation of the Management/ Company.

d. During office hours, employees are required to restrain from investing their time, on personal mobiles, social media including group chat, playing online games etc.

e. All employees are morally duty bound to raise timely alarm in case they observe/get informed/reported of the incidence of any unethical/integrity issues/gross process violation and/or any action by fellow/group of employees which may lead to reputational/financial hazard to the Company. Any such untoward incidence happening in Branches/Hubs/Zones/CSO will be in real time and simultaneously reported to respective Functional Head and Head HR/ Chief People Officer. Any attempt to suppress/dilute the veracity of the incidence by any employee is not acceptable and will be viewed seriously.

f. Employees should refrain from impertinence, insubordination, dereliction of duty, disobedience or refusal to work or obey, whether alone or in combination with others, of any lawful and reasonable

order of superior/supervisor. If any employee doubts the veracity, legality or reasonableness of an order of superior, he/she can raise his/her objections only after complying with the instructions and shall not refuse to obey the same.

g. Employees must not engage in sexual harassment or conduct themselves in a way that could be construed as such.

Do Remember

Refrain from using inappropriate language, shouting, public humiliation, keeping or posting inappropriate or objectionable materials in your work area, or accessing inappropriate or objectionable materials on their or your computer/mobile phone both official and personal.

a. Consumption or possession of alcohol, illegal drugs, and other controlled substances in the workplace and being under the influence of these substances on the job and during working hours is strictly prohibited. However, possession of prescription medication for medical treatment is permitted.

b. There may be Company-sponsored events where management approves serving of alcoholic beverages. In these cases, all appropriate liquor laws must be followed, including laws regarding the prohibition of serving of alcohol to those under the legally permissible age.

c. However, under all such cases, excessive drinking, intoxication and misbehaviour at these events is prohibited and will be dealt with severely.

d. No employee(s) shall get involved in any relationship within or outside the Company, during or outside the work hours, which adversely affects the interest, reputation of the Company or is perceived by the Company to be detrimental, prejudicial to its interests.

e. Though, the Company discourages any intimate or romantic relationships between employees, yet in the event the same exists, it shall be brought to the notice of the Head HR/ Chief People Officer forthwith. This shall be done regardless of whether there exists any conflict of interest. The Company shall be free to take appropriate decision in such cases.

f. Employee should not deliver derogatory speeches / incite other employees to misbehave or indulge in any act of intimidation or coercion against any co-employee.

g. Employee should not make any false/incorrect reports / entries on any official Company documents or records.

What should I do?

Q: A member of my team has been dating his team member for a couple of months. They were discreet about it at work, but people still found out. I am not supposed to know about it officially. There are rumours about this affair. It is fair to say some of the other team members are not happy about it. Of course, I am keeping an eye on things to make sure there can be no evidence of favouritism –what if they split up and it all gets nasty? Should I do something about it – and if so, what?

A: This is a very sensitive situation. At PNB Housing, we respect employees' private lives, and therefore we do not need or want to know about their romantic relationships. However, we do have an interest in their professional relationships. The situation above described is not appropriate because there is a conflict of interest. A manager cannot be expected to judge his subordinate objectively if he is romantically involved. You should consult HR in order to discuss how to handle this. Ideally, one of the employees should leave or move to another department with no reporting structure, and we would endeavour to make sure that this could be achieved effectively but with

sensitivity. Depending on the facts and circumstances, there may also be a sexual harassment issue.

Do Remember

A customer asked an employee to prepare a lengthy and detailed report, including service information that would take much effort to acquire. This employee populated the report with false data, in order to get to the customer quickly. These actions are dishonest and constituted unfair treatment of a customer.

a. Employee should act with sincerity in attending any Company arranged trainings/ coaching / workshop as and when assigned.

b. Employee should not make use of offensive vile or obscene language with hidden imputation against their subordinates, peers and Company management.

c. Employee should avoid idling within work premises, neglecting work or gossiping with other employees on duty.

d. While on duty employees will always wear Company's identity card and lapel pin.

What should I do?

Q: I am attending a customer meeting with my colleague, and my colleague makes, what I believe to be an intentional false statement about our / organization capabilities. What should I do?

A: Correct the error during the meeting if possible. If that is not possible, raise the issue with the employee, your manager, or HR Manager after the meeting, and ensure that the company corrects any customer misperception. If you are correct that the other employee intentionally lied to a customer, the employee violated the Code.

a. All employees must ensure that they must always do what is right for customers by:

・Helping them make informed financial choices and being honest and fair in their dealings and communications with them.

・Protecting customer confidential information and data.

・Providing timely and fair resolution to customer concerns and complaints.

b. Employees should make use of the breakout area / pantry / lobby space to make any personal calls to avoid disturbance/distraction to fellow employees.

c. All employees must adhere to official dress code policy.

d. PNB Housing strictly prohibits 'Moonlighting' or dual employment which means "taking up a second job, often secretly, outside normal business hours, while continuing to be formally employed with another employer".

1.9. Conduct after Office Hours

a. Employee off-duty conduct is generally regarded as private, as long as, such conduct does not compromise or jeopardize the reputation /image of the organization.

b. Notwithstanding anything to the contrary stated herein, in order to encourage camaraderie between colleagues, the employees may socialize after working hours. However, they should be mindful of the following:

- Employees should be dressed appropriately.

- At public places, the employees should be mindful of not engaging in loose talks/gossiping/criticizing fellow colleagues or in any manner bringing disrepute to the Company.

- Indulge in any unlawful/ immoral activity (as per the Indian law).

c. No objection certificate to be obtained before taking any non-work-related session's/collegeseminar's/attending conference etc. Also, no information related to the company or company products to be shared or disclosed without prior approval from Head HR/ Chief People Officer.

What should I do?

Q: I am a follower of some political party or some religious institution that I regularly join the procession turned violent one day due to some issue. I got arrested and an FIR was lodged against me. In such cases what should an employee do?

A: Following any political party or religious institution is not an issue but getting involved in any unlawful activity and disturbing general law an order is an offence, and employee should always refrain themselves from such activity.

a. Employees are strictly prohibited from engaging in any kind of physical contact or public display of affection with fellow colleague that would in any way be deemed inappropriate.

b. Outstation visits/vacation/tours with colleagues should be informed individually to their immediate reporting manager with all details of participants and the nature of such an outing. If required, the reporting managers should inform the Head HR/ Chief People Officer of such an itinerary.

1.10. Conduct during Official Functions

a. Employees attending official function i.e., annual business meets/review meetings, Company sponsored trainings, should be appropriately dressed on all occasions i.e., business formals or as specified in the instructions issued by appropriate authority.

b. Strictly adhere to the laid down event timings.

1.11. Conduct during Official Social Functions

a. Employees attending any social function i.e., Founder's Day, off-site trips etc. are advised to dress in business casuals/smart casuals only. (Should avoid inappropriate dresses including shorts, camouflage clothes, pants worn below the waist or hip line, crop tops, spaghetti strap tops, skirts/dresses above mid-thigh whether with or without leggings, see-through shirts etc.)

b. In case alcoholic beverages are being served during official social functions, employees are advised to be mindful of consuming appropriate quantity to avoid display of unbecoming behaviour, derogatory humour, compromise with safety issues etc.

What should I do?

Q: To reward employees for the hard work; Company "A" has a policy to send their top 10 performing employees to an international location. One of employee had gone to such off-site trip

for the first time. He/ She decided to visit a famous night club with another colleague. “A” was offered drugs by some unknown person at the night club. He/ She could not say no and decided to consume almost negligible quantity out of excitement. Is this ethical?

A: No, this is unethical and immoral. Employees should refrain from drugs/solicitation of prostitution or any other immoral or illegal activity. This is not only prohibited as per company’s code of conduct; however, this is illegal too in the Indian court of law.

a. Employee should not engage in any public displays of affection or other behaviour that creates a hostile work environment for others, or that makes others uncomfortable.

b. Consumption or possession of alcohol, illegal drugs, other controlled substances and getting involved in any immoral activity while on any official off-site either sponsored by Company or by any business partner which has business tie-up with the company is strictly prohibited.

What should I do?

Q: You have heard while on official off-site trip, if you need 'party pills or drugs' a new colleague who is accompanying you can provide that? What am I supposed to do?

A: You should report this to HR Department. No one should be selling / providing or consuming drugs at work or on official trip/function. Our Code makes it clear that we will act to ensure our people can work in a place that's safe, healthy and free from substance misuse. It specifically prohibits the promoting/consumption of drugs at work or while on duty. We want to create a workplace that is free from substance abuse, so we can protect people from its consequences. It is imperative that as an organization, we challenge wrong behaviour.

a. No photographs of official functions/outings are allowed to be uploaded on social media.

1.12. Social Media Conduct

When using social media, whether for personal or permitted business reasons and whether during or outside of work hours, employee must follow below guidelines:

a. While publishing any post/status updates on social media platforms like LinkedIn, Facebook, Twitter, Instagram, YouTube, Quora, etc. employees should be mindful of any adverse effect their actions may have on the Company’s image.

What should I do?

Q: I have a personal blog where I share my thoughts and feelings with my friends. What should I consider before including any work-related information?

A: Be careful. Media tools such as personal blogs, wikis, and networking sites are subject to the same rules as any other communications. Do not disclose any confidential business information.

For example, do not write about acquisitions, product recalls, organizational changes, relationships with customers or vendors, financial information, personal employee information (address, phone numbers, employee identification numbers), or any other sensitive or confidential information.

a. Employees should be aware that PNB Housing may scan/observe content and information made available by employees through social media. Employees should use their best judgment in posting material that is neither inappropriate nor detrimental to the Company and its stakeholders, including the management, employees, vendors, customers, and even industry peers.

b. Although not an exhaustive list, some specific examples of prohibited social media conduct include posting commentary, speeches, content, or images that are defamatory, pornographic, proprietary, harassing, political, abusive, hateful, or that can create a hostile environment.

c. Employees will not publish, post or release any information that is considered confidential or not public. If there are questions about what is considered confidential, employees should check with the HR Manager and/or the supervisor.

d. If employees encounter a situation while using social media that threatens to become antagonistic, employees should disengage from the dialogue in a polite manner in case such incident affects the interest or image of the Company.

e. Employees should not post any image(s) /iconography / Company's logo on personal social media websites of such nature, which may put the Company's reputation at risk.

f. No employee shall give, publish, canvass or send any information to the media including the press, internet, mobile, electronic media or through any other such mode, any information, which, if made public, may be detrimental to the best interest of the Company. In case any media representative / journalist contacts an employee for sourcing any confidential or private information about the Company (intentionally or unintentionally), he/she must refrain from sharing such information and inform the Corporate Communications manager immediately.

g. Personal use of external social media sites should be conducted outside the office working time and should not interfere with your job. No reference or use of Company memorabilia will be allowed.

h. Company's workplace values and standards apply to employee's online activities, including refraining from harassment or retaliatory actions of any kind which affects or is likely to affect the interest, image, reputation of the Company.

i. Employees should refrain from posting intimate and inappropriate pictures between two colleagues, on any of the social media websites such as Facebook, Instagram, LinkedIn/ WhatsApp (the list is not exhaustive).

What should I do?

Q: A co-worker posted an offensive, sexual comment about me on her personal social media page. Is my co-worker allowed to do that?

A: Employee use of online media must comply with Company policies, including POSH, Code of Conduct.

1.13. Conduct while representing organization on social media i.e. Linked-In, WhatsApp, Twitter, Yammer etc

a. All employees having their identity as PNB Housing officials/representing the organization, on various social media websites are strictly advised to use their formal photograph as profile picture,

irrespective of the account being private in nature. In case of Company provided sim/mobile phone connection only formal photograph will be used as WhatsApp display picture.

b. Any act which might endanger the reputation of the organization will be an act of misconduct and would be punishable as per the disciplinary policy of the Company.

c. Employees should use their judgement and wisdom before posting any information/pictures/facts etc. on such channel to avoid bringing disrepute to the Company.

d. No employee shall give, publish or threat to publish the information related to any ongoing investigation on social media platform. This would be punishable as per the disciplinary policy of the Company. All external communications by employees will require prior approval of MD & CEO.

1.14. Adherence to Information Security Policy

All employees are supposed to ensure:

a. To protect the information against unauthorized access by maintaining its confidentiality.

b. To report any observed or suspected Information security incidents to the Information Security team.

c. To maintain privacy of personally identifiable information.

d. To never share their passwords.

e. That PNB Housing information needs to be classified and labelled based on their business value and impact to business operations.

f. That any information that is shared should be strictly done based on business 'need-to-have' and business 'need-to-know' with authorized users.

g. Internet access should be for official purpose only. Employees are prohibited to access or download sexually suggestive or explicit, gaming, file sharing, or other inappropriate files or websites.

Employees should also note that:

a. Personal computing devices (not owned or managed by PNB Housing) comprising of personal laptops, i-PAD's and Tablets are not allowed within PNB Housing premises or connect to PNB Housing network.

b. PNB Housing employees are accountable for all the activities associated with their user Identities (ID's).

c. Use of PNB Housing resources is limited to business purposes and PNB Housing reserves the right to monitor and report this usage.

d. Personal files/photographs which are trivia in nature should not be stored on Company laptops / desktops and mobile devises.

The following will be deemed unacceptable uses of PNB Housing resources:

a. Transmitting or otherwise removing information from the office for personal use, that contravenes the privacy of customers and PNB Housing personnel and PNB Housing intellectual property.

b. Engaging in activities that disrupt network communications and/or system availability.

c. Engaging in any activity that is illegal under Corporate, Local, State, National or International laws or not approved PNB Housing while utilizing PNB Housing owned resources.

What should I do?

Q: I am taking a vacation where I want to completely disconnect. Is it okay if I leave my laptop with my Colleague to handle any approvals in various company systems on my behalf? I trust this person completely, so I don't mind sharing my password.

A: No. Employees should never give their password to anyone. Some systems allow you to delegate certain actions to others; other systems escalate issues to your manager in case of absence. If you bypass these controls, you are undermining the security of our systems, avoiding your own responsibilities and putting your colleague in the position of also violating Company policy.

1.15. Conduct on usage of Corporate Mobile Device/Connection Policy

a. Employees who have procured mobile handset as per the policy guidelines or are using corporate connection for day-to-day business purpose, should strictly use for official purpose only.

b. Any mobile devices used to access PNB Housing email / data shall have a password protection enabled on the device and the device must be controlled via Mobile Device Management (MDM) or similar application.

1.16. Conduct to protect Company's Protect

a. All employees of the Company are responsible for protecting and taking reasonable steps to prevent the theft or misuse of, or damage to Company's assets, including all kinds of physical assets, movable, immovable and tangible property, corporate information and intellectual property.

What should I do?

Q: Employee "A" and "B" works in different department however they get to speak to each other very regularly for work related assignments. As both of them are vintage employees and share good rapport with each other, one day they decided to go out for coffee. They had good time and came back with lot of good memories, photographs clicked together.

After the meeting, Employee "A" shared photographs with employee "B" of the event and some personal photographs and videos. Is it a right behaviour?

A: No, even employee "A" & "B" are friendly colleagues, they should avoid sharing personal photographs, videos or information which is personal in nature with any colleague.

What should I do?

Q: I just got an e-mail from my manager which makes fun of another employee's looks. I thought it was funny and I sent it on to a few others in my contact list. Have I misused company resources just by sending an e-mail?

A: Yes. E-mailing or forwarding e-mails with inappropriate jokes or content is a misuse of resource and therefore a violation of the Code of Conduct. If you receive these e-mails, delete them. And if you're comfortable speaking to your team leader about it, provide feedback and ask them not to send such e-mails anymore.

a. All employees must use all equipment's, stationery, printed material, supplies only for Company's legitimate business interests. Company's property must not be borrowed, loaned, or disposed of, except in accordance with appropriate Company's policies.

b. All employees must use and maintain Company's property and resources efficiently and with due care and diligence.

What should I do?

Q: A manager persistently asked an administrative assistant to take care of the manager's personal business on Company time, such as balancing a personal check book, buying fruits, shopping for personal gifts. The manager misused the assistant's work time, which is a Company's asset. Is this a prohibited behaviour?

A: Yes, this is a prohibited behaviour. Once in a while this is ok, however repeated use of company's resources/asset is against the code of conduct.

What should I do?

Q: An employee had access to Company's branded products to be used for various promotional activity. The employee sent some of the products to an acquaintance working at a hotel chain in exchange for free hotel rooms for the employee's personal use. Is this appropriate?

A: No, as the employee has misused Company assets.

What should I do?

Q: I am a marketing manager and have volunteered to deliver a course on marketing at a local college. I believe that my students would benefit from a discussion of how the Company developed several marketing campaigns. Can I discuss this work in class?

A: The development of marketing campaigns is a Company work product and a Company asset. Much of this work may be proprietary and may not be appropriate to reveal outside the Company.

What should I do?

Q: Employee "A" generally makes occasional personal phone call or e-mail from the workplace and Employee "B" seeing that employee "A" making calls/emails for personal reasons started making excessive personal calls thinking that this is acceptable usage of company's asset. Is this behaviour, right?

A: No this is not a right behaviour. We should protect Company's assets and use those assets in the manner intended. One should not use Company's asset for your personal benefit or the benefit of anyone other than the Company.

The above Company policy is an indicative parameter for social and official conduct. The Head HR/ Chief People Officer and the Managing Director & CEO have a right jointly and severally to make a judgement on a reported incidence, whether the same is in violation of this code of conduct.

SPEAK UP!

If you believe that you have been discriminated against, harassed or have not been given equal opportunity you are encouraged to voice it to Grievance redressal committee or directly to:

Head HR/ Chief People Officer

Email ID: CPO@pnbhousing.com

To promote transparency and inclusivity, you may submit your grievance either by disclosing your identity or anonymously. All grievances, whether identified or anonymous, will be reviewed and addressed with due care and confidentiality.

1.17. Staff accountability in line with applicable guidelines:

Non-compliance/ violation of the code of conduct would lead to examination of staff accountability as per Policy of the Company.

1.18. Deviation

Any changes in the policy will be approved by the Board of Directors of the Company.