



BUSINESS CONDUCT & ETHICS POLICY



PURPOSE

In line with the Vision and Mission Statement and in furtherance of our Procam Values as defined below, the following Business Conduct and Ethics Policy is applicable.

PROCAM VALUES

Our philosophy is to be ethical and practice highest value standards. This is embodied in the way we work with our clients and the way our employees interact with clear focus on service and client value creation.

APPLICABILITY / PRIMARY RESPONSIBILITY

This Policy applies to all the Full Time and Outsourced Employees, Vendors and Contractors of the company. The company expects its Managers to be the primary owners of this Policy and act in all such ways that this Policy is duly communicated to all and practiced by all in their places of work. Location Specific Policies are to be consistent with this Policy.

COVERAGE

Professionalism – To remain committed to the highest professional standards in all the interactions both internally and externally.

Conflict of Interest – The company expects its Employees to always act in its best interests and to ensure highest level of integrity in all their dealings.

Confidentiality – All employees are expected to treat all information with due confidentiality and not divulge any information unless with prior approval of their Business Heads.

Harassment – The company encourages its employees to ensure a work environment that is free from any inappropriate behaviour of all kinds and harassment on account of any identity.

Statutory Compliance – All business dealings of the Company have to be conducted within the ambit of the Legal Framework as defined by the Governing Law of the Land with highest regard to Professional Ethics.

Amendments to this Policy may be issued from time to time as decided by the Board of Directors and these will be duly communicated to all concerned.

4th July 2011

DIRECTOR