

Head Office :

1A, First Floor, Metro Plaza, Commercial Complex,

E-5 Arera Colony Bhopal, 462016 (M.P.)

Phone No. (0755) 2422829, 4222624

Website: www.psaitech.com Email: support@psaitech.com

**Part 6: Compliance with Ethical Standards and Best Practices of the Questionnaire.**

Please provide copies/links to the documents pertaining to

1. Company's codes of ethics and business conduct and key anti-corruption compliance policies.

Ans : **Code of Ethics & Business Conduct and Key Anti-Corruption Compliance Policies**

1. Introduction

PS Associates is committed to maintaining the highest standards of ethical conduct, integrity, transparency, and professionalism in all business dealings. This Code of Ethics and Business Conduct applies to all employees, contractors, consultants, and representatives of the organization.

2. Core Ethical Principles**a. Integrity and Honesty**

All employees must perform their duties truthfully, fairly, and transparently. Misrepresentation, fraud, or any form of unethical behaviour is strictly prohibited.

b. Professional Conduct

Employees must behave responsibly and respectfully with clients, vendors, partners, and colleagues. Professionalism must be upheld at all times.

c. Confidentiality

Sensitive company information, client data, and internal documents must be protected. Employees must not disclose confidential information to unauthorized persons.

d. Conflict of Interest

Employees must avoid situations where personal interests conflict with company interests. Any potential conflict must be reported immediately to management.

3. Anti-Corruption and Anti-Bribery Policy

PS Associates maintains a **zero-tolerance policy** toward corruption, bribery, and unlawful inducements.

a. Prohibition of Bribery

Employees must not offer, give, request, or accept bribes, kickbacks, gifts, or anything of value intended to improperly influence business decisions.

b. Gifts & Hospitality

Only modest and reasonable gifts or hospitality that are lawful and transparent may be

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Branch Off. : Mumbai : F-153, Dreams The Mall, LBS Marg, Bhandup (W) Mumbai - 400078
Ph. : 022 - 21661918, 21661921

Bhopal : Plot No.162, 3rd Floor Windsor Square, Opp. Vishal Mega Mart, Kolar Road, Bhopal.
Ph.: 0755 - 4037103



accepted. Anything excessive, suspicious, or intended to influence business outcomes is forbidden.

c. Compliance With Laws

All employees must follow applicable anti-corruption laws, including:

- Prevention of Corruption Act, 1988 (India)
- Companies Act, 2013
- Any other relevant local or international compliance guidelines

d. Third-Party Conduct

Vendors, subcontractors, and partners representing PS Associates must adhere to the same ethical and anti-corruption standards. Due diligence is required before engaging any third party.

4. Reporting Violations

Employees are encouraged to report any unethical or suspicious conduct without fear of retaliation. Reports may be submitted to:

- Immediate supervisor
- Compliance officer / Management
- Anonymous reporting mechanism (if applicable)

All reports will be investigated confidentially and thoroughly.

5. Disciplinary Actions

Violation of this Code or anti-corruption policies may result in:

- Warning or written reprimand
- Suspension or termination
- Legal action, where applicable

6. Acknowledgement

All employees and representatives of PS Associates must read, understand, and comply with this Code of Ethics and Business Conduct. Signing the acknowledgment is mandatory.

- Company's ethics and compliance training, including employees who receive training, frequency, and topics covered.

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Proprietor



- Company's onboarding process for third parties, including due diligence performed, training requirements, and ongoing monitoring.
 - Company's reporting (whistleblowing) channels.
2. Company's ethics and compliance training, including employees who receive training, frequency, and topics covered.

Ans: PS Associates is committed to promoting a culture of integrity, transparency and responsible business conduct. To ensure this, the company has established a structured Ethics and Compliance Training Program.

1. Employees Covered Under Training

Ethics and compliance training is mandatory for:

- All full-time and part-time employees
- Contract staff and field personnel
- Supervisors, team leaders, and department heads
- Any employee involved in client interaction, finance, procurement, or operations
- Newly joined employees as part of induction/orientation

2. Training Frequency

PS Associates conducts ethics and compliance training on a regular schedule:

- **Annual Mandatory Training** for all employees
- **Induction Training** for new hires within their first 30 days
- **Quarterly Refresher Sessions** for high-risk functions (procurement, finance, field operations)
- **Special Training Sessions** whenever there are updates to laws, policies, or client requirements

3. Key Topics Covered

The training program covers essential areas to reinforce ethical conduct and regulatory compliance:

A. Code of Ethics and Business Conduct

- Integrity, honesty, and fair business practices
- Behaviour expectations for all employees

B. Anti-Corruption & Anti-Bribery Compliance

- Zero-tolerance policy for bribery and corruption
- Prohibition of facilitation payments, kickbacks, or undue influence
- Handling gifts, hospitality and conflict-of-interest situations

C. Legal & Regulatory Compliance

- Compliance with labour laws, GST regulations, safety rules

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- Responsibilities related to documentation and reporting

D. Workplace Conduct & Respectful Behaviour

- Anti-harassment and anti-discrimination rules
- Maintaining a safe, respectful and inclusive work environment

E. Confidentiality & Data Protection

- Protection of client data and sensitive company information
- Secure handling, storage, and sharing of data

F. Reporting & Whistleblower Mechanism

- Safe reporting channels for unethical conduct
- Protection against retaliation

4. Training Methods

PS Associates uses a combination of:

- Classroom sessions
- Digital/e-learning modules
- Case studies and scenario-based exercises
- Periodic assessments and certification tests

5. Record Keeping

- Attendance, completion certificates, and training materials are documented and maintained.
- Employees who fail to complete mandatory training are required to undergo make-up sessions.

3. Company's onboarding process for third parties, including due diligence performed, training, requirements, and ongoing monitoring.

Ans:- PS Associates follows a structured and transparent process for onboarding third parties (vendors, subcontractors, service partners, and consultants) to ensure compliance, integrity, and operational reliability.

1. Third-Party Onboarding Process

A. Initial Screening

- Collection of basic company information, registration documents, PAN, GST, licenses, and certifications.
- Verification of experience, reputation, and capability to deliver required services.
- Assessment of alignment with PS Associates' ethical and compliance standards.

B. Risk Assessment

Each third party is classified as **low, medium, or high risk** based on:

- Nature of services provided
- Financial stability
- Operational dependency
- Interaction with government departments or high-value transactions
- Past compliance track record

High-risk entities undergo enhanced checks before approval.

C. Due Diligence Performed

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PS Associates performs detailed due diligence covering:

- Legal validity (registrations, licenses, statutory compliance)
 - Financial soundness (balance sheets, GST returns, IT returns)
 - Reference checks from past clients
 - History of litigation, penalties, or blacklisting
 - Verification of workforce compliance (PF, ESIC, minimum wages)
 - Anti-bribery and anti-corruption red-flag assessment
- Only third parties that meet the standards are approved for engagement.
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2. Training Requirements for Third Parties

To ensure compliance with PS Associates' ethics and operational standards, the company provides onboarding training covering:

A. Code of Ethics & Business Conduct

- Expected behaviour and integrity requirements
- Zero-tolerance policy for corruption or unethical practices

B. Anti-Corruption & Anti-Bribery Compliance

- Prohibition of bribes, kickbacks, facilitation payments
- Gift and hospitality rules
- Reporting obligations for suspicious activities

C. Operational & Safety Requirements

- Specific scope-related standards
- Workplace safety, discipline, and documentation requirements

D. Data Protection & Confidentiality

- Protection of client information and company data
- Secure handling of documents and electronic communication

Third-party personnel must acknowledge these policies in writing before beginning work.

3. Contractual Requirements

All third-party agreements include:

- Clear scope of work and service-level expectations
 - Confidentiality and data-protection clauses
 - Anti-corruption and compliance commitments
 - Statutory compliance requirements (PF, ESIC, wages, licenses)
 - Penalty clauses for non-compliance or unethical behaviour
- No third party is allowed to operate without a formally executed agreement.
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4. Ongoing Monitoring & Compliance Oversight

PS Associates ensures continuous monitoring through:

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A. Periodic Compliance Checks

- Verification of statutory documents (PF, ESIC, GST, wages registers)
- Review of licenses, certifications, and renewals
- Physical audits of deployment sites (if applicable)

B. Performance Monitoring

- Monthly/quarterly evaluation of service quality
- Review of delivery timelines and adherence to contract terms

C. Risk-Based Audits

- High-risk vendors undergo more frequent inspections
- Surprise checks for operational compliance, labour conditions, and documentation

D. Reporting & Issue Resolution

- Mechanisms for reporting violations or concerns
- Corrective action plans for any non-compliance detected
- Contract suspension or termination in case of serious breaches

5. Annual Review & Re-Evaluation

All third parties are re-evaluated annually to ensure:

- Continued compliance with legal and ethical standards
- Updated financial and statutory documents
- Satisfactory performance rating

Only compliant entities are retained.

4. Company's reporting (whistleblowing) channels.

Ans :- Escalation Matrix and Toll-Free/Service Support Details

Toll-Free / Service Support Number: (0755) 4222624

Alternate Contact: 9713000743/ 9109144388

Email ID: support@psaitech.com

Website: www.psaitech.com

Support Hours: Monday–Saturday, 10:00 AM – 07:00 PM

Designation	Name	Contact No.	Email ID
General Manager	Mihilal Patel	9109144388	gm@psaitech.com
Business Development Manager	Shubhi Raghuvanshi	9713000743	bdm1@psaitech.com

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