

Statement of Ethics and Business Practices

Dear All,

These guidelines are aimed at providing guidance to all the employees in order to enable certain and efficient dispensation of work ensuring good governance and fair practices, in light of relevant legal and regulatory framework. These guidelines are further intended to help us in arriving at prudent decision that are in accordance with the law and reflective of high professional standards forming the very basis of our progress.

Keeping the above goals in view, all concerned are advised as follows:

1. While informal communication between colleagues can be very helpful in free flow of relevant information within concerned department, it is expected that a good working relationship is maintained leaving no room for personal biases or professional rivalries/intrigues.
2. Courtesy demands that appropriate channels of communication should be used for any formal request/demands leaving no ambiguity while ensuring expeditious disposal. A departmental head is, therefore, expected to communicate with other department at the same level.
3. Role of HR demand that a congenial working atmosphere is provided ensuring that employees are able to perform to the best of their abilities toward organizational goals
4. All employees are expected to demonstrate good discipline and spend their working hours productively for the Company.
5. Company ensures job security on the basis of demonstrated professionalism and competitiveness. Therefore, there remains no room for flattering/cultivation of senior colleagues out of a sense of insecurity or threat.
6. Particularly do not interfere in areas that do not pertain to you. This is different from adding value and contributing in other areas, which should be done as a matter of course through proper channels.
7. Department Heads are also expected to evaluate their junior colleagues on the basis of their competence, professionalism and discipline only.
8. We strongly believe that knowledge sharing is a requisite for growth of the Company. Therefore, all senior colleagues are encouraged to capacity building of their junior colleagues.
9. Feel free to disagree, challenge or question your colleagues' points of view (at any level) within the norms of professional ethics and decent behavior.
10. Personal liking or disliking should not influence one's professional decisions.
11. Professional behavior demands that due respect is given to every colleague regardless of his/her position. Therefore, in particular all senior colleagues are expected to ensure respectful attitude

Statement of Ethics and Business Practices

towards their colleagues/juniors. Personal temperament /anger find no place in corporate environment. Likewise junior colleagues are also expected to implement the instructions/decisions of their senior colleagues with due diligence and sincerity to the Company.

12. High level of personal monetary integrity, intellectual competence and sincerity is expected from all the colleagues. Any divergence in this regards will invoke stringent action.
13. Discipline in attendance, working hours, personal behavior and office decorum must be maintained all times. Lunch timings are to be observed strictly.
14. Any absence from duty without prior approval from the competent authority (as specified in HR policy) may invoke disciplinary action.
15. We have diversity of culture so learn to work in diversity culture environment and show high spirit for team building and leadership.
16. Illegal and unethical acts are strictly prohibited. Compliance with applicable laws and regulations are mandatory according to scope of work.
17. High level of accuracy in accounting records will be ensured in connection of business activities to safeguard the financial interest of the company.
18. An employee will not have interest in any business or other organization which interferes or potentially interfere in any way with the company.
19. Employees are not allowed to undertake hedging, pledging or insurance strategies for their remuneration or for any other aspect that might alter or undermine the risk alignment effects inherent in remuneration mechanism.
20. Employee is responsible to read and understand Company's Policy and Procedures on AML/CFT/CPF.
21. Employee will comply fully with all anti-money laundering policies and procedures in respect of customer identification, account monitoring, record keeping and reporting pertaining to his/her respective area.
22. Employee will remain vigilant to the possibility of money laundering through use of PCICL's products and services. Promptly reporting to Managing Director or Chief Compliance Officer will be ensured, where he/she has knowledge or grounds to suspect a criminal activity or where he/she has suspicion of money laundering or terrorist financing or proliferation financing.

Statement of Ethics and Business Practices

23. Employee will not disclose the fact to the customer or any other quarter that a suspicious transaction or related information is being or has been reported to any authority, except if required by law. In case of misconduct an action will be taken according to AML Act 2010, as amended from time to time.

Responsibilities related to Business Conduct and Fair Treatment of Customers

24. Employee will ensure that all dealings with customers are conducted with fairness, transparency, honesty and professionalism enabling customers to make informed decisions.
25. All customer communications including product information, agreements and disclosures will be clear, accurate, complete, non-misleading and provided in a timely manner.
26. Employee will ensure that products and services offered to customers are suitable to their requirements, financial capacity, risk appetite and business objectives.
27. Employee will ensure that all pricing, fees and charges are fair, reasonable and transparent and aligned with market practices and no unjustified or duplicate charges will be imposed.
28. Employee will ensure that no customer is discriminated against on the basis of region, gender, disability, occupation or any other unjustified factor.
29. Employee will ensure confidentiality and privacy of customer information and the customer data to be collected, processed, stored and shared only in accordance with applicable laws, regulations and internal policies.
30. Employees will ensure that customer data is accessed strictly on a need-to-know basis and protected against unauthorized access, disclosure or misuse.
31. Any conflicts of interest arising in customer dealings or dealing with any other party on behalf of the Company must be identified, disclosed and appropriately managed to ensure fair outcomes for customers.
32. Employees will ensure that all contractual terms, financing arrangements and key risks are clearly communicated and documented to customers prior to execution.
33. Employees will ensure responsible business conduct across all third-party arrangements including outsourcing partners with strict adherence to confidentiality and ethical standards.

Every employee will be responsible to report any breach of the above mentioned practices to the Senior Management and/or Human Resource Division. Any breach of these standards and deliberate non-reporting may result in disciplinary action in accordance with Company policies and regulatory requirements.



Statement of Ethics and Business Practices

We trust that the above guidelines will be helpful in facilitating your professional work thus optimizing your output.

Best Regards,

A handwritten signature in blue ink, appearing to read "Song Zhenwen", is written over a light blue grid background.

Song Zhenwen

Managing Director