



PSC Group Code of Business Conduct Ethics and Responsibilities

COBER 2026

This Code sets out how we conduct business, treat people and protect the trust placed in PSC. It applies across the group's industrial supply, lubrication, sealing, safety, rig consumables and international sourcing activities.

ENTITIES COVERED

- Project Sales Corp — India
- PSC Hand Safety India Private Limited — India
- PSC Gulf Services & General Trading FZCO — UAE
- PSC Houston Oilfield Supplies LLC — United States

OUR COMMITMENT

We earn business through technical understanding, quality, fair pricing, dependable service and responsible conduct. We do not permit personal gain, bribery or improper influence to determine our business decisions.

DOCUMENT STATUS

Group policy draft prepared on 8 October 2026 for management review and adoption. This document updates the December 2023 PSC Code while preserving its core principles.

Policy owner	PSC Group management
Review cycle	Annual review and whenever material changes require an update
Approval & effective date	To be recorded upon adoption

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Purpose, Values and Responsibilities

Supporting critical industries since 2000

PSC was established on 7 April 2000 in Visakhapatnam. Our work has grown from power-station maintenance supplies into specialist industrial solutions and international supply across India, the UAE and Houston. As our activities expand, the same standards must guide every transaction and every workplace.

Mission

We bring technical understanding and dependable supply to industrial and operational requirements, helping customers improve equipment reliability, reduce downtime and protect people.

Vision

We seek to be a preferred supply partner whom customers trust for our products, service, application knowledge and the way we conduct business.

Core values

Integrity means being truthful, fair and accountable. Responsibility means considering the effect of our decisions on customers, suppliers, colleagues and the wider community. Value addition means understanding the requirement and contributing useful knowledge and dependable execution.

Who must follow this Code

All group partners, directors, managers, employees and consultants acting for PSC must follow this Code. We expect agents, service providers and other parties representing PSC to respect its principles in their work for the group. Each entity must also follow the laws and requirements applicable to its activities.

Individual and management responsibility

Every person must understand the Code, ask before acting when uncertain, disclose concerns and cooperate with reviews. Managers must explain these standards, model them in their own conduct and address warning signs promptly. Sales targets, deadlines or customer pressure do not justify a breach.

When in doubt, ask before acting

Before proceeding, ask: Is this truthful? Is it fair? Does it comply with applicable requirements and PSC policy? Could it create personal gain or improper influence? Would I be comfortable explaining the decision openly to management? If the answer is unclear, pause and ask your manager or group management.

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Integrity in Commercial Dealings

Honest information and commitments

We give customers and suppliers accurate information about products, specifications, availability, lead times, origin and commercial terms. We do not knowingly misrepresent approvals, certifications, performance, distributor status or stock. Where information is uncertain, we state the limitation and verify it before making a commitment.

Fair pricing and urgent requirements

Our prices should reflect product cost, service, logistics and a reasonable margin needed for business sustainability and growth. We do not exploit an emergency by imposing unjustified charges. Genuine costs associated with expedited sourcing or delivery must be explained clearly in the offer.

Product suitability and delivery

We work to understand the application and supply the agreed product. An alternative, changed specification or substitution must be explained and accepted by the customer before supply. We do not promise a product capability that is not supported by reliable information.

No personal gain

No employee or representative may seek a personal payment, commission, favour or other benefit from a customer, supplier or service provider in connection with PSC business. Business opportunities and resources must not be diverted for personal benefit.

Conflicts of interest

Disclose relationships or interests that could influence a business decision, including a financial interest in a supplier or a close personal relationship with someone involved in a transaction. Seek management direction before participating in a decision where impartiality could reasonably be questioned.

Fair competition and supplier relationships

We compete on product quality, knowledge, price, service and execution. We do not use false statements to damage a competitor or seek confidential competitor information through improper means. We honour agreed supplier terms, distribution restrictions and customer commitments.

Accurate records

Quotations, orders, invoices, expense claims and transaction records must reflect the actual business activity. Do not hide an improper payment in a discount, service charge, reimbursement or other description. Keep supporting records so decisions and transactions can be explained.

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Bribery, Gifts and Business Hospitality

No bribes, kickbacks or improper exchanges

PSC prohibits offering, requesting, authorising, giving or receiving a bribe or kickback, directly or through another person. Business must not depend on cash, gifts, favours or entertainment provided in return for an order, approval, preferential treatment or another improper advantage.

The standard applies to everyone

These principles apply to government and private-sector dealings, and to customers, suppliers, agents and service providers in every country. Applicable anti-bribery requirements, including the US Foreign Corrupt Practices Act and UK Bribery Act where relevant, must be respected. This Code does not replace applicable law or a stricter customer or supplier policy.

What may be acceptable

Modest shared items such as festival sweets or ordinary promotional pens and diaries may be accepted where they do not influence a decision, create an obligation or breach another party's policy. An item of nominal value that is accepted must be reported to the manager.

The existing nominal gift limit is retained for review: below US\$10 or ₹750 in cash-equivalent value. This describes the value of an item; it does not permit gifts of cash or cash equivalents. A low value never makes an improper gift acceptable.

What is prohibited

Cash and cash-equivalent gifts are prohibited. So are gifts or hospitality that create an obligation, influence buying or selling, breach law or policy, or form part of an agreement to do something in return. Gifts to customers should be nominal and should not be personal-use articles, except legitimate product samples supplied for evaluation.

Product samples and hospitality

Product samples must have a genuine evaluation or demonstration purpose and must not become a disguised personal benefit. Before offering or accepting hospitality where the propriety is unclear, obtain management direction and record its business purpose.

Warning signs and response

Statements such as "everyone does it", "no one will know", or "we cannot get the business without this payment" are warning signs. Decline the improper request, preserve relevant records and notify management. Do not proceed simply because a transaction is urgent or commercially important.

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Respectful, Safe and Professional Workplaces

Merit and equal treatment

PSC recruits and develops people on merit, considering education, experience, skills and ability. We do not permit discrimination on grounds such as caste, religion, race, colour, nationality, gender, sexual orientation, gender identity, age, marital status or disability. People must be treated with dignity in hiring, daily work and career development.

Harassment, bullying and victimisation

Harassment, bullying, intimidation and sexual harassment are prohibited. This includes unwelcome sexual advances, pressure for sexual activity, offensive remarks or jokes, derogatory statements, unwanted touching, threatening conduct, offensive images and physical or psychological abuse. The same standards apply to work-related electronic communication and interactions outside the office.

Raising a workplace concern

Raise a concern promptly with a manager, HR or group management. If a manager is involved, use another reporting route. Complaints must be handled sensitively, with information restricted to those who need it for a proper response. Applicable local complaint and statutory procedures remain available and must be followed where required.

Health and safety

Follow site rules and relevant safety procedures. Do not bypass safeguards or ask another person to perform an unsafe task to meet a deadline. Report unsafe conditions and obtain appropriate guidance before continuing a task where there is a serious unresolved safety concern.

Professional communication

Communicate accurately, respectfully and professionally with colleagues and external parties. Do not send abusive, discriminatory or misleading messages. Emails and other written communications may become permanent records and may be forwarded or read outside their original context.

Manager accountability

Managers must not ignore misconduct, discourage a concern or excuse poor behaviour because someone performs well commercially. A respectful workplace requires consistent standards at every level of the organisation.

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Information, Resources and Responsible Trade

Protecting business information

Customer data, supplier information, pricing, commercial records and internal business information must be used only for authorised work. Do not share them outside PSC without an authorised business purpose and appropriate permission, or a legal requirement handled through management.

Responsible use of company resources

Company funds, equipment, facilities, software and information must be used responsibly. Do not take resources for personal gain or allow unauthorised access. Ask the appropriate manager about any limited personal use rather than assuming permission.

Email, internet and access

Use PSC systems for legitimate business activities. Do not access, transmit or download inappropriate content. Keep accounts and access details secure, check recipients before sharing sensitive information and report suspected loss, unauthorised disclosure or misuse promptly.

International trade and supplier restrictions

Follow applicable import, export and re-export requirements and the restrictions communicated by suppliers. Verify the required destination, end use, documentation and authorisation before committing where restrictions may apply. Do not bypass a restriction through another group entity, intermediary or misleading description.

Product and compliance documentation

Certificates, technical datasheets, origin statements and shipping documents must be genuine and accurately associated with the supplied item. Do not alter a document to imply a certification, approval or origin that the product does not have. Escalate inconsistencies before dispatch.

Public statements and digital content

Website content, catalogues and other public communications must accurately describe PSC's capabilities and relationships. Use verified project details and product claims. Distinguish authorised representation from sourcing or supply experience, and protect confidential customer information.

Seeking guidance

Where a legal, trade, safety or documentation requirement is unclear, consult management and obtain appropriate specialist guidance. Uncertainty must be resolved before PSC makes a commitment that may breach a requirement.

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Reporting, Accountability and Acknowledgement

Speak up

Employees, customers, suppliers, partners and other third parties are encouraged to report suspected breaches of this Code or unlawful conduct connected with PSC. Report facts and concerns honestly; you do not need to complete your own investigation before raising a concern.

Reporting contacts

Speak to your manager, HR or group management. For direct escalation, contact Satish Agrawal — Email: satish@projectsalescorp.com · Phone: +91 98851 49412

Handling reports

Management will review concerns and arrange an appropriate response. Information should be shared only as needed for assessment, investigation and corrective action. Absolute confidentiality cannot be promised where disclosure is necessary for a fair review or required by law.

No retaliation

No person should be penalised for raising a concern honestly or cooperating with a review. Report intimidation, pressure or retaliation through the same escalation routes. Knowingly false allegations and deliberate concealment of misconduct are inconsistent with this Code.

Consequences and corrective action

Breaches may lead to corrective or disciplinary action, including termination of employment or a business relationship where appropriate, subject to applicable procedures and law. Seniority or commercial performance does not exempt anyone from accountability.

Policy administration

Group management is responsible for adoption, communication and review of this Code. Local procedures may supplement it to address an entity's requirements. Employees must receive access to the adopted Code and seek guidance on provisions that affect their work. Material changes should be communicated to the people concerned.

I confirm that I have read and understood the PSC Group Code of Business Conduct Ethics and Responsibilities. I will follow its standards, seek guidance when uncertain and report concerns honestly. I understand that this acknowledgement does not replace applicable law or the terms of my employment.

Name

Entity and department

Signature

Date
