

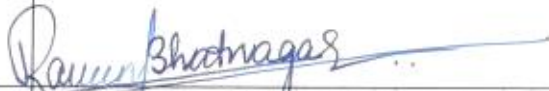
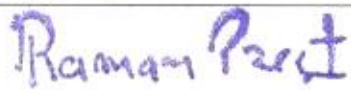
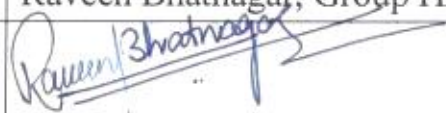
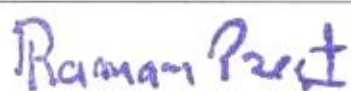
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1.0 **Purpose:**

To encourage and guide employees for organizational disciplinary procedures and code of conduct policy including Conflict of Interest.

2.0 **Scope:**

Covers all regular employees of PIBM including trainees / off roll, where applicable

3.0 **Code Of Conduct:**

- 3.1 It is important that all our employees conduct themselves in a professional, mature and responsible manner. If behaviour continues to fall below expectations after informal and/or formal counselling, it may result towards the termination of employee. Conduct similar to but not limited to the following may result in disciplinary proceedings up to and including termination:

General discipline for all employees:

- No employee will take undue favors from vendors / parties for personal reasons either financial or otherwise
- No employee will tamper with any official records / documents concerning academics. He will be accountable for any misappropriation of facts / transactions reported by concerned stakeholders.
- Any financial fraud committed in the campus must be reported to the Director for a prompt investigation.
- No employee will show disrespect to any of the other employees irrespective of creed / caste / level and outside vendors / suppliers / faculty of other institutes and will manage the relationship in a professional manner.

Discipline at organizational level:

Financial linked

- Engaging in fraud, embezzlement, defalcations, or other such practices
- Records falsification
- Buying institute merchandise for resale
- Transferring institute money into your personal bank account
- Fabricating travel, stay and food bills during official trips
- Claiming personal expenses during official trips
- Theft of institute property & Documents

Employment linked / Work environment linked misconducts:

- Acting against the terms and conditions of employment accepted and agreed upon at the time of joining the organization
- Willfully absconding from duty without prior approval of concerned Function Head / Management
- Insubordination or refusing to obey instructions properly issued by the concerned reporting manager / HOD pertaining to your work, refusal to help out on any special assignment.
- Malicious gossip and/or spreading rumors, engaging in behavior to create discord and lack of harmony, interfering with another member on the job: willfully restricting work output or encouraging others to do the same
- Dishonesty, willful falsification or misrepresentation on your employment application or other work records, lying about sick leave or any form of leave giving false reasons for absence.
- Institute policies and/or laws violation
- Threatening, intimidating or insubordinate behavior or physical violence.
- Gambling/ consuming alcohol during working hours of business
- Entertaining our official vendors on alcohol
- Removing or destroying institute records or property, releasing confidential or proprietary information without appropriate approval.
- Possessing weapons or firearms or gambling during working hours.
- Engaging in other acts that may be contrary to the best interest of the Institute.
- Improper use of Institute equipment and systems.
- Violations of government laws and regulations of our Education Industry.
- Breach of Customer and/ or Institute confidentiality.

Sexual Harassment:

- Disrespect to the female employees of the organization.
- Outraging the modesty of our female employees.
- Making sexual advances towards our female employees.

- Carrying out offensive acts / provocations against female employees, threatening them, intimidating them and mentally torturing them at workplace or outside.
- Approaching female employees for sexual favors at workplace.
- Gender related issues of any kind, undermining a female employee's prestige and honor.

General acts of misconduct / indiscipline:

- Violation of safety rules
- Discrimination based on caste, creed, color, religion, gender etc.
- Violation of laid down systems and processes at functional and organization levels.
- Unsatisfactory or careless work, failure to meet standards as explained by concerned manager for the function.
- Leaving job responsibilities during work hours without permission of concerned manager, except to use the rest rooms.

Relationship with Suppliers and Customers

All employees shall ensure that in their dealings with suppliers and customers, the Institute's interests are never compromised. Accepting gifts and presents of more than a nominal value, payments from suppliers or customers will be viewed as serious breach of discipline as this could lead to compromising the Institute's interests.

Legal Compliance

It is the Institute's policy to comply fully with all applicable laws and regulations. Senior Management Committees must satisfy themselves that sound and adequate arrangements exist to ensure that they comply with the legal and regulatory requirements impacting each business and identify and respond to developments in the regulatory environment in which they operate. In the event the implication of any law is not clear, the Institute's Legal Department / or any Legal Consultant on contract shall be consulted for advice.

- 3.2 Termination decisions will be made in consideration of all the facts by Group HR Head / Director as recommendations and final decision taken by the Chairman. All such incidents will be placed in the employee's personal file and recorded for future reference.

4.0

Individual Responsibility:

All Employees are responsible for performing at a level that is consistent with expectations and adhering to the work engagement schedule / rules / procedures, and complying with all laws. If an employee is unclear about any of these procedures, it is the employee's responsibility to consult a manager/process owner or HR on the Roles and responsibilities enshrined in the concerned Job Description.

An employee noticing any behaviour inconsistent with expectations or the needs of the organization must bring it to the attention of the appropriate person i.e. Regional SPOC at the region and / or to the Group HR Head at the main Campus in Pune.

5.0

Conflict of Interest:

Due to the demands and the competitive nature of the business, we have a special concern with regard to potential conflict of interest. The institute expects Employees to devote full working time and best efforts to our situation.

5.2 Our employees should also avoid any situation where personal interests conflict or appear to conflict with the interest of the institute. A few instances may be :

- Empaneling a vendor who is a relative without approval
- Talking to media for any business reasons without approval
- Accepting gifts from any vendor/client.
- Using logo / brand of PIBM for self-interest.
- Employment of relative without information / approval

Improper factors which may influence an employee to do business with a particular vendor (instead of with another vendor who may offer a better price or product to the Institute) includes having hidden ownership interest in the vendor (directly or through a family member); accepting personal favors, tickets to sporting events, invitations to parties or other special treatment for the vendor, accepting offers of special jobs for relatives, and accepting kickbacks, bribes, commissions or other financial inducements in exchange for steering business to the vendor or as a reward for having done so.

Where an employee accepts anything of value from a vendor without immediate and prompt disclosure or otherwise, violates this clause, the employee will be subject to serious disciplinary action including termination.

6.0

Confidential & Proprietary Information:

- 6.1 To ensure the security of confidential information, employees are requested to ensure that their desk is cleared of all business related material after office hours. Employees should not at any time, during employment or after the termination of services with the institute, disclose to any party any information relating to the practices, business dealings or affairs of the institute, including the terms of your employment. No staff member should make use of any official information, position or name of the institute to directly or indirectly further his/her private interests.

A separate Non-Disclosure Agreement (NDA) is required to be signed by every existing employee and any new employee joining the organization. A copy of the NDA is annexed as Annexure "A".

7.0

Ethical Committee & Disciplinary Procedure:

- 7.1 For the purpose of taking un-biased and fast action against such issues, Ethical Committee will be formed comprising Group HR Head, Director of the Institute, and Dy. Director-Academics, any one other member from the Senior Team co-opted for the purpose.

In the event of misconduct by an employee and/or other such circumstances, the case will be investigated by the Group HR Head with the concerned HOD. Ethical Committee will be required to investigate and report to Chairman for final judgement.

The Institute will formulate a Prevention of Sexual Harassment Committee comprising of 4 members, of at-least 50% are lady members and the Committee will be led by a lady member. The Committee will be responsible to investigate any complaints received on account of sexual harassment and give appropriate timely findings and recommendations of actions against the guilty employee.

8.0

Employee Grievance Procedure:

- 8.1 The Institute seeks to foster a quality work environment for all its employees and encourage a high level of individual and team contribution in support of business goals. Inevitably, however from, time to time employees may have

some questions, concerns or problems. If an employee encounters such difficulties, they are encouraged to discuss them with their reporting manager. If for, some reason, this is not feasible or appropriate, the issue(s) should be raised with Human Resources at Campus in Pune. All issues must be raised in writing.

A grievance will be investigated and the following steps will be followed by the Ethics Committee:

- Incident report based on complaint received
- Preliminary investigation
- Issue of Show Cause Notice
- Recording of statements
- Detailed investigations leading to charge –sheet of an employee
- Findings of the investigation
- Appeal process
- Punishment given appropriate to the misconduct proved

Punishment can range from any of the following:

- Censure / Warning
- Stoppage of increment
- Suspension
- Termination from service

9.0

Whistle-blower Guidelines

- PIBM is committed to the highest possible standards of ethical, moral and legal business conduct. In line with this commitment and PIBM's commitment to open communication, this policy aims to provide an avenue for members to raise concerns and reassurances that they will be protected from reprisals or victimization for whistle blowing in good faith.
- The whistle blowing guideline is intended to cover serious concerns that could have a large impact on the organization, such as actions that may lead to incorrect financial reporting; are unlawful; are not in line with institute policy, including the Code of Conduct; or otherwise amount to serious improper conduct.
- In case any member is found indulging in any of the above actions, strict disciplinary action will be taken against the concerned members.
- In case any member wishes to file a complaint, he/she can do so.
- The matter should be reported to the Group HR Head. The action taken will depend on the nature of the concern. Every effort will be made to protect the complainant's identity.

- Malicious allegations may result in disciplinary actions.

10.0 **Negative Communication & Rumours**

- Baseless rumours, loose talks about people & their personal lives within and outside our organization lead to severe unnecessary discord amongst employees
- Also, people targeted in such cases have to face unpleasant remarks for no fault of theirs or for no reason
- Employees should know how damaging it is to partake in gossip & slanderous remarks against employees. It creates tension, animosity and organizational problems.
- Managers must deal promptly with people dealing in certain types of behaviour that are unacceptable – such as “belittling, character assassinations, gossip or criticize people behind their backs, linking employees on a personal level, malicious personal gossip, humiliating, or verbally abusing.
- Leadership should be direct but tactful. It is essential for managers to set appropriate boundaries with regard to talks against or about an employee.
- Timely actions can reduce frictions and avoid erosion of relationships in the larger interest of the organization. Buckling under the weight of mindless gossips and investing institute time rectifying the same can be disruptive for the organization.
- Those responsible for such behavior and found guilty of maligning an employee’s image and reputation shall face “disciplinary action” as per the Code of Conduct guidelines enshrined in this policy. Such employees may be warned or reprimanded in writing or may even be terminated.
- Any such case can be highlighted to the Ethics Committee / Group HR Head for appropriate action.

11.0 **Code of ethics for Academic Research**

Definition and Context-

It is utmost important and fundamental to the research that the intellectual properties created by others need to be respected. Plagiarism is misrepresentation of ideas, words, or other creative expression as one’s own and is a clear violation of code of ethics. Engaging in plagiarism is violation of copyright and is a punishable by statute. Following can be the acts to be called as plagiarism

Verbatim copying, partially copying or paraphrasing other’s research work.

Copying formula or equations of other’s papers which are not commonly known.

Copying the portion of others work and citing but it is not clearly communicating which part of the work has been copied or cited. The cited portion has to be shown in inverted commas.

Self-plagiarism by the way of copying verbatim your own work earlier published in any conference proceedings or journal.

Faculty members and researchers at PIBM must not engage themselves in producing research that is plagiarized. Plagiarism up to 8% is permissible as per the norms.

The Research Ethics Committee

The research ethics committee comprises of Director, Dy Director-Academics, Head Research and a Professor will enquire the matter and take disciplinary action in case faculties are found engaged in plagiarism.

Amendments & Retention to the Policy

This policy document along with all allied Standard Procedures & Controlled Formats can be discarded or amended or any new introductions in lieu can be entertained by the recommendation of Review committee led by the Chairman.

ANNEXURE – II

Employee Responsibilities

- ✓ As an Employee of PIBM, it is our responsibility to:
- ✓ Learn and understand the elements of the Code
- ✓ Comply with the Code and associated policies and guidelines
- ✓ Seek Clarifications and assistance when in doubt
- ✓ Promptly report known / suspected violations

- ✓ Cooperate in investigations pertaining to Code violations

Management Responsibilities

- ✓ Building and maintaining a culture of compliance
- ✓ Preventing and detecting problems and issues of compliance
- ✓ Responding expeditiously to issues as they emerge (investigate / resolve)
- ✓ Communicate the COC guidelines clearly to all employees