## [ CODE OF CONDUCT AND BUSINESS ETHICS POLICY ]

PANORAMA aspires for all our Employees and stakeholders to embody the Core values- Integrity, Compassion and Perseverance by which the Company has been built on and which maintains and enhances our reputation.

Our commitment is reinforced through clear definition of the rules, encouragement of making a conscious decision in conducting themselves to these standards beyond their professional obligation and assimilating "Walking the Talk" principle.

Thus this policy has been purposely designed to:

- Ensure that that this policy is distributed to all employees on an annual basis and is periodically updated by the Executive Committee;
- Ensure that each of us no matter what position we hold knows, understands, and performs with the highest ethical standards in every aspect of our work.
- Foster and maintain Employee trust and confidence in the professionalism and the integrity of the Employees of the Company by ensuring that all Employees adhere to appropriate standards of conduct;
- Set down the procedures to be followed when standards of conduct give rise to problems which cannot be resolved by advice and encouragement, training or increased support.
- Understand the kind of acts and omissions that constitute misconduct at work, in which sanctions may apply in respect of disciplinary matters, ensures fairness, equality and consistency in their application.
- Set-out responsibilities and duties of management and Employees in relation to handling disciplinary matters.
- Establish a common and uniform procedure for the management of Employee discipline to be able to ensure that any concerns over Employees' conduct or performance are handled in a fair, consistent and timely manner.
- Ensure any corrective action follows to protect the operation of the company's business and the health and safety of its Employees.
- Deal with issues arising as a result of misconduct/negligence, poor and under performance, as a result of lack of capability and suspected fraud or financial irregularity.
- Hold people accountable for adhering to this code

All new employees will acknowledge an understanding and acceptance of this Policy in writing. Employees found to have participated in an activity that violates the Code are subject to disciplinary action, including dismissal.