

POLICY NO 9

Code of Conduct

9. Code of Conduct

9.1 Personal Conduct

- At Group FIE, we live our core values, in every facet of our organizational fabric. Integrity is one of our fundamental values that we espouse in our daily transactions and behaviors. Given this, the code of conduct for Group FIE is developed by ensuring that all rules and regulations of the company and ethical standards must always be complied with by employees onsite and offsite.
- All employees should conduct themselves properly by keeping in mind that their personal and social behavior has a profound bearing on the company in terms of reputation as ethically responsible company.
- Group FIE employees are expected to practice discipline at the workplace exhibiting positive attitude in interactions, maintaining a safe and healthy working environment, staying well within the perimeter of laws and regulations of state and Group FIE.
- Group FIE believes in equal opportunities and encourages a conducive environment where employees shall refrain from discriminating against people with physical disabilities and impairments.
- Employees shall not indulge, directly or indirectly, in nepotism, parochialism, favoritism, discrimination against religious groups or race or any disadvantaged segments of society

9.2 Scope

- i.** This Code is mandatory for compliance by all employees, whether full or part time, employed by Group FIE, directly or indirectly through a service contract and wherever located.
- ii.** It also applies as a general guideline to the Directors of the Board, *mutatis mutandis*.
- iii.** It sets out minimum standards of good corporate practices and lays down core values relating to the lawful and ethical conduct of our business activities and provides guidance to all. While the Code provides guidance on the aspects of integrity and impartiality, it cannot and does not cover every situation an employee may encounter. If an employee is uncertain about what to do in a particular situation, guidance should be sought from the Reporting Officer or the concerned line Manager.
- iv.** It may be amended or varied generally or specifically with the approval of the Board of Directors for changes due to regulations, laws, and practice.

9.3 Acts of Aggression

At Group FIE, any acts or threats of violence, whether physical or verbal, including harassment, intimidation, and derogatory jokes, are strictly prohibited. The company values the dignity of individuals and expects all employees to act accordingly.

9.4 Abuse and assault

To promote discipline and maintain a professional environment, Group FIE requires full compliance from its employees. Any physical or verbal altercations that occur within the workplace will result in immediate disciplinary action.

9.5 Possession of Arms

Under no circumstances are employees permitted to possess weapons or any form of device or ammunition intended to inflict harm while on the premises of Group FIE.

9.6 Use of Intoxicants

Group FIE places a strong emphasis on workplace safety. To ensure this, employees are strictly prohibited from consuming drugs or alcohol while on company premises. Any violation of this policy may result in serious disciplinary action or termination.

9.7 Internal Communication

At Group FIE, we strongly believe in an environment which is conducive for ideation and innovation without any fear of reprisals. We ensure that the employees are provided with the fullest of psychological safety to share candid and open opinions during their workplace interactions, within the conduct boundaries as spelled in this manual. We will ensure to create “Agility Bubbles” being the free spaces where employees be allowed to experiment without fear of failures and reprisals.

9.8 Health, Safety and Security

- Group FIE is committed to providing its employees safe and secure work environment by reducing their risk to unnecessary risk. Employees are expected to follow company rules and procedures, to avoid unsafe actions, to help ensure their own safety as well as the safety of others.
- Line managers also have a duty to provide their teams with a safe and secure business environment, including building awareness of potential safety risks and training on how to manage it. In case employees become aware of any dangerous health or safety condition, they should report it to their line manager, Security, or Human Resources department.

9.9 Restriction on Lending and Borrowing and other Activities.

The company has strict policies to avoid any conflict of interest between employees and external parties. Therefore, every employee is prohibited from lending or borrowing money from anyone who has business dealings with the company. Additionally, employees cannot engage in any other work or investment that may influence their duty. Moreover, they cannot act as agents for any external parties. Lastly, employees cannot encourage or allow any investment by their family that could embarrass or influence them in their official responsibilities.

9.10 Inside Information

Every employee shall serve the Company honestly and faithfully and shall maintain strict secrecy regarding the

affairs and business of the Company and associate allies. He/ she shall use his/ her utmost endeavor to promote the business and affairs of the Company and show courtesy and attention in all transactions with the customers, the public, fellow employees, and employees of other organizations.

9.11 Representation of Company

Being an employee of Group FIE does not mean that the employee is allowed to act or speak on behalf of the Company. No employee shall make any statement or address letters to the Press/ social media or deliver a speech on electronic/ social media or contribute any article to any newspaper or journal concerning the affairs and operations of the Company, unless duly authorized by the CEO. The right to issue a public statement is exclusively reserved with the CEO or his/ her designated person(s).

9.12 Using Company Resources

Group FIE provides company resources for the purpose of business use and for the fulfillment of company objectives. Usage of company resources must be reasonable and must not interfere with the performance of employees' job responsibilities or distract other employees. Employee use of Company asset that is excessive or that violates Company policy is strictly prohibited.

Effective use of Company resources is critical to the Company's profitability. Company resources include such things as:

- i. Company time
- ii. Company materials & supplies
- iii. Company telephones & fax machines
- iv. Company equipment
- v. Company information
- vi. Electronic mail
- vii. Computer systems
- viii. Vehicles

9.13 Customer Privacy

Group FIE is strongly cognizant of its primal responsibility of ensuring the privacy of its customers in line with regulations governing information security.

An employee may not access, view, use, modify, share, or distribute customer information without proper business reasons and without proper authorization. Employees should always consult their line managers and legal or HR department regarding issues arising in connection with customer information protection.

9.14 Conflict of Interest

A Conflict of Interest ("COI") occurs if any FIE Group Employee, member of the Boards of Directors or Third Party working on behalf of FIE Group has personal interests (e.g., relationships, activities or obligations) that are inconsistent or interfere, or have the potential to be inconsistent or interfere, in any way with the interests of FIE Group and/ or the duties and obligations owed by such a person to FIE Group, or appear to do so.

1. Policy Details

The section specifies all the essential requirements for adequately addressing and mitigating risks arising out of COI situations.

- i.** All Persons must avoid situations that may create a COI between their personal interests and interests of FIE Group.
- ii.** All Persons must never take advantage of their employment with FIE Group for personal gain and never take any action or have any interest that makes it difficult for them to perform their work objectively and effectively or that interferes with their judgment.
- iii.** All Persons must disclose COI through COI Disclosure Mechanism, if they are aware of, or suspect that they may have, a COI, and inform their line manager and HR department. This must be done immediately on the triggering of the COI or when they become aware of the situation.
- iv.** A Person will not hold (directly or indirectly through a Relative) any financial interest (significant or otherwise) in an organization having business with FIE Group unless it is appropriately disclosed, and the person complies with all mitigating actions recommended by the FIE Group. This includes having ownership, shareholdings, loans, advances, guarantees or any other investment arrangement in a Third Party that does or seeks to do

business or engage in competition with FIE Group. For disclosed COIs, potential safeguards may include the following:

- Person who is holding an interest in an organization having business with FIE Group, will not be involved in any decision-making process related to that organization in which he/she is holding financial interest; and
- Person will be advised to strictly ensure that any confidential information of FIE Group (including information related to tenders) shall not be shared with the organization in which he/she is holding financial interest.

- v. A Person may also confront a COI situation if he/she, being a FIE Group Employee, also provides services to or represents a Third Party that does, or has the potential to do business, or engage in competition with FIE Group. The primary obligation is to avoid a COI situation with FIE Group. Therefore, any outside activity, including consultancy services, must be kept totally separate from their activities with FIE Group and must not affect their ability to satisfactorily perform their job at FIE Group. This also includes acting as an officer or director of any outside business concern, Third Party or serving on the board of directors of a bona fide charitable, educational or any other organization.
- If a potential COI is disclosed, then the appropriate safeguards in such a situation shall primarily include the involved party excluding themselves from the decision-making process related to the third party.

- vi.** The use of FIE Group financial or technological assets, facilities, know-how, or Employee resources for any other business or personal endeavor other than FIE Group's approved activities or program will also create a COI situation. All Persons have an obligation to protect FIE Group assets and must avoid using these assets/resources for personal gain.

- vii.** A COI will also occur if, a Person accepts, any gift from a Third Party, particularly where the purpose is, or could appear to be, to improperly influence a business decision or relationship. Gift Disclosure is a mandatory requirement and all Business Courtesies accepted from Third Parties must be submitted to the HR function.

- viii.** Conducting business with a Relative or any Third Party in which a Relative has Substantial Control can also create a potential COI. Whenever A Person is involved in FIE Group business decision involving a Relative, they must inform their line manager/ HR Department and make a COI disclosure and remove themselves from being involved in the decision in any way.
This includes employing or hiring a Relative in any way (e.g., as an employee, contractor, or consultant). All Persons should avoid any personal relationship with another person who has a direct or indirect reporting connection to them where the relationship may lead to a loss of trust and confidence in the objectivity and performance of their work and/ or that of the other person.

- ix. Every Person has an obligation to disclose any Related Party Transactions they are involved in, or stand to benefit from, by completing the "COI Disclosure Form". Person who has an interest in a Related Party Transaction shall make the disclosure before FIE Group enters into that transaction and shall not vote nor assist on any management decision presented to the FIE Boards in respect of the Related Party Transaction.
- Every Person who failed to disclose his relationship in connection with a Related Party Transaction or is involved in any way in decisions regarding the Related Party Transaction may face disciplinary action and may be subject to punishment under Company Law and shall also be liable for damages to FIE Group if a Related Party Transaction is concluded in contravention of this Policy or if it is proven that the transaction is unfair or involves a COI and incurs damages to FIE Group.
 - Finance Department working together with Group's Company Secretary shall consolidate, compile and confirm the details of Related Parties involved in Related Party Transactions where the names of such parties shall be recorded in a register together with the details of their transactions, and the actions taken in relation thereto and such details will update FIE Group's respective Audit & Risk Management Committees accordingly.

2. COI Disclosure Process – Employees

- i.** New Employees: It will be mandatory for new Employees of FIE Group to disclose any potential COI they are aware of to the HR department during their induction process. FIE Group HR will ensure inclusion of COI Declaration during the induction process of new Employees (**Appendix-C**).
- ii.** Ongoing Disclosure: In addition to above, it is mandatory for all FIE Group Employees to immediately declare COI, whenever they are promoted, move to a different department, or when there are any changes in their work circumstances that may create a potential COI or modify a pre-existing COI situation. There may be cases where Employees were not aware of COI situations when they arose. In such a situation it is the responsibility of Employee to disclose the COI as soon as they become aware of it. Employees are required to review and sign the "COI Disclosure Form" through Conflicts of Interest Disclosure Mechanism maintained by HR department.
- iii.** Employees are required to review and sign the "COI Disclosure Form" annually during the Annual Performance Objectives Setting process, which shall remain in custody of HR function (**Appendix-C**).
- iv.** All Employees are obligated to sign the COI Declaration Statement (**Appendix-B**) prior to signing the contract. In the event of a conflict, it is mandatory to submit a COI Disclosure Form (**Appendix-C**).
- v.** Failure to disclose an actual, potential, or perceived COI may result in disciplinary action against the Employee.

3. COI Disclosure Process - Directors

The members of Boards of Directors shall disclose the COI in accordance with applicable laws to the Board through Company Secretary.

4. COI Disclosure Process – Third Parties

i. Third Parties have an obligation to disclose any COI to FIE Group's Procurement teams during their due diligence review and on-boarding processes. Third Parties are also under an ongoing obligation to immediately disclose any potential or actual COI situation to FIE Group's Procurement team (of relevant entity) whenever they become aware of any such development.

ii. Procurement shall ensure that the COI declaration is an integral part of the Third-Party Due Diligence Process. Failure to disclose an actual, potential, or perceived COI in accordance with the above process is a breach of this Policy and could result in the automatic enforcement of the penalty clause (beside any other contractual right) under the contract between FIE Group and the third party, pursuant to this Policy.

5. COI Resolution Process

The process for the resolution of Conflicts of Interest disclosures is as follows:

i. HR will review all information that every Person has provided in the COI Disclosure Form and will determine whether a situation of COI has occurred. If a COI is found to exist, investigation and necessary action will be taken.

- ii.** Action will need to be taken to resolve the COI in accordance with FIE Group policies. HR and Employee's line manager (or the head of the business unit/ function) will work together to resolve any COI and take any necessary action to do so.
- iii.** Acting on an objective and reasonable basis, the HR with Employee's line management shall take all necessary actions to ensure that the COI does not have a reasonable likelihood to negatively affect FIE Group, the people involved or any other Third Party.
- iv.** If the negative effect of a COI cannot be satisfactorily managed and has the reasonable likelihood to affect FIE Group, the Company's decision will be binding, and accordingly, Employee will be prohibited from engaging in or permitting the COI to continue. For this purpose, the final decision will rest with CEO in relation to COI disclosures by CXO-2 and above and with Head of HR for grades below CXO-2.
- v.** Any Employee wishing to accept a directorship role or a sub-board committee membership at any Third-Party entity, must immediately submit the disclosure to HR through respective CXO. HR will review and evaluate the disclosures. For this purpose, the final decision will rest with CEO in relation to COI disclosures by CXO-2 and above, & with Group CHRO for grades below CXO-2.

vi. In the case of the CEO, HR shall provide its recommendation to the respective Chairpersons of FIE Boards of Directors for final approval.

6. Consequences of Non-Compliance

- Since every possible COI situation that might arise cannot be anticipated, consequently all persons are encouraged to discuss with HR function any questions about specific facts and scenarios that may invoke provisions of this Policy. If confronted with a situation in which a Person has any doubt or uncertainty, he/she should contact his/her line manager for advice before proceeding.
- Failure to comply with this Policy shall lead the Persons to disciplinary action up to, and including, termination.

7. Communication & Training

HR function shall develop, organize, supervise or conduct annual COI training sessions or educational programs for Employees to provide them with guidance on disclosing any COI they may be aware of.

APPENDIX A - Definitions

"Conflict of Interest" is a situation or a combination thereof when a FIE Group's representative has a personal or outside interest that conflicts with FIE Group's best interests. This personal interest could be direct or indirect i.e., direct holding of a financial (investment) interest or indirect holding through a Family Member. You may have a COI that relates to a Relevant Third Party you are engaging, or a Relevant Third Party may have a COI with you or FIE Group.

"Employee(s)": For the purposes of this Policy includes all individuals working at management/ officer levels and grades (whether permanent "full time", "part-time", fixed-term or temporary), trainees, interns, duly authorized third Parties or any other person working under the supervision and/or associated with FIE Group as management or officer.

"Entertainment" includes but is not limited to business meals, hospitality, entertainment, tours, and/or cultural and sports events.

"Family Member" is a spouse, son or daughter, son-in-law or daughter-in-law, brother or sister, stepbrother or stepsister, brother-in-law or sister-in-law, parent, grand parent, grandchild, parent-in-law, stepparent, step child, cousin and anyone in the same household.

"Gift(s)" include anything presented as a token, social courtesy or to commemorate an occasion such as a holiday, birthday, or special event as well as FIE Group branded gifts and other items such as cash, merchandise, tokens of appreciation, gift baskets, samples, products, tickets, discounts, promotional items, and offers of employment.

"Hospitality(ies)" refers to accommodations and transportation expenses.

"Meals" refers to any food or beverages, including, but not limited to, lunch or dinner at a restaurant.

"Related Party" includes -(i} a director or his relative; (ii} a key managerial personnel or his relative; (iii) a firm, in which a director, manager or his relative is a partner; (iv} a private company in which a director or manager is a member or director; (v} a public company in which a director or manager is a director or holds along with his relatives, any shares of its paid up share capital; (vi) anybody corporate whose chief executive or manager is accustomed to act in accordance with the advice, directions or instructions of a director or manager; (vii) any person on whose advice, directions or instructions a director or manager is accustomed to act: (Provided that nothing specified in above definition and shall apply to the advice, directions or instructions given in a professional capacity); (viii) any company which is-(A) a holding, subsidiary or an associated company of such company; or (B) a subsidiary of a holding company to which it is also a subsidiary; (ix) such other person as may be specified.

"Related Party Transactions" are transactions entered into with Related Parties, as well as subsidiary companies, sister companies or affiliate companies. These include dealings, contracts, or agreements, irrespective of whether these transactions fall within the main activity of FIE Group or not.

"Relative(s)" is any Family Member and includes a spouse, parents, children, and siblings, whether by blood, marriage, or adoption (including in-laws) or anyone residing in a person's home (other than a tenant or domestic employee). It also includes a close friend.

"Third Party(ies)": Any individual, entity, or organization you encounter during your work at FIE Group. This includes actual and potential customers, suppliers and business contacts.

APPENDIX B - Conflicts of Interest Declaration Statement – For all employees, before contract signing

Name:

Organization:

Department:

Designation:

Employee ID:

Email:

Contract Name:

Contract Number:

I hereby declare that no situation of real, potential, and apparent conflict of interest is known to me that can affect my discharge of duty or responsibility in any manner. I hereby fully understand that in case, any information that may cause me to be in a position that shall be in conflict of interest arising after this declaration, I shall thereafter declare the same.

Signature:

Date:

APPENDIX C - Conflicts of Interest Disclosure Form

Employee Name		Date of Disclosure	
Designation		Employee ID	
Entity		Department	

Please complete the questionnaire below. If you answer "Yes" to any of the questions, provide details in the space allowed including but not limited to date of COI event, financial value (if any), name, nature of relationship and other details of other party. Attach additional sheets if required.

S#	Question	Yes/No	Remarks
1	Have you or any of your relatives have ownership or direct or indirect interest in any business that competes with or provides products or services to FIE Group?		
2	Have you or anyone from your relatives received or given gifts or items of value from and to a third party, vendor, or supplier of FIE Group? (Not required at induction level)		
3	Have you received any sponsored vacations, entertainment package, loans or any special discounts from customers, vendors or suppliers of FIE Group (Not required at induction level)?		
4	Do you provide consultancy or any other services to any company having current or potential business relationship with FIE Group?		
5	Do you have any other employment (part time), business or provide any services (whether for remuneration or otherwise) which is in addition to your employment with the FIE Group?		
6	Do you use FIE Group's resources such as information, supplies, goods and technology for personal benefit(s)? (Not required at induction level)		
7	Do you have any relative working full-time, part-time, or on contractual basis with FIE Group? If yes share name, function, designation and relationship nature.		

I hereby certify that:

1. My answers to above questions are true and complete to the best of my knowledge.
2. Should any information provided in my responses become incomplete or inaccurate, I understand that I am obligated to revise or supplement that information in a timely manner; and,
3. I further certify that if any information in my responses is found to be inaccurate or not disclosed, I would be held responsible for that as per the Company policies.

Employee Signature:		Date:
To be completed by the line manager		
Conflict of Interest is addressed?	Yes (including details of action taken):	
	No (including reason for no action):	
	Special conditions/ comments:	
Manager Name:		
Manager Signature:		Date:

9.15 Whistle Blowing Policy

1. Objectives of the Whistle Blowing Policy

FIE Group (FIE) is committed to the highest possible standards of openness, probity and accountability. In line with that commitment FIE expects employees and other stakeholders (suppliers & customers) that it deals with, to come forward and voice their serious concerns about any aspect of FIE's work.

The objective of this policy is to promote greater openness in the workplace and to encourage all individuals to disclose immediately any malpractice or wrongdoings that may adversely impact FIE. In addition, this policy will enable the Audit & Risk Management Committee to discharge its responsibilities of establishing procedures for identification and redressal of grievances arising from unethical practices.

An important aspect of accountability and transparency is a mechanism to enable all individuals to feel confident to voice concerns internally in a responsible and effective manner when they discover information which they believe shows malpractice or wrongdoing. Any person raising such concern shall be referred to as a Whistle Blower.

The Whistle Blowing Policy is therefore fundamental to enhance professional integrity and to provide avenues for any individual to raise concerns in confidence and receive feedback on any action taken. It provides a method of properly addressing bona-fide concerns that individuals within and outside FIE might have, while also offering

Whistle Blowers protection from victimization, harassment or disciplinary proceedings. The policy, however, discourages employees and other stakeholders from making complaints with a malicious intent.

2. Areas in which concerns can be raised

Specific examples of circumstances where a Whistle Blower can raise concerns could include but shall not be limited to:

- Over-invoicing, demanding, seeking or acceptance of kickbacks, payment for goods or services not supplied or rendered and any act of fraud, bribery and corruption.
- Forgery of company documents and financial instruments like cheques and securities.
- Theft or misappropriation of company's funds and property.
- Conflicts of interest and abuse of office.
- Disclosure of business secrets and other confidential company information obtained during employment.
- Financial or Non-financial maladministration or malpractice or fraud that has been/ is likely to be committed.
- Usage of confidential information to obtain a personal reward or advantage.
- Compromising the interests of FIE in dealings with vendors or contractors, consultants or suppliers.
- Misuse of FIE property.

- Misuse of authority.
- Unethical behavior.
- Misuse of information systems or sharing of passwords/IDs.
- Discrimination towards any staff member, customers or any stakeholders on the grounds of sex, race, nationality or religion.
- Engaging in illegal or unlawful acts; and
- Compromising Health & Safety standards.

Vendors and customers also can blow the whistle for malpractices and wrongdoings that adversely affect FIE. However, routine vendor grievances and disputes over delays in delivery, LDs, PO issuance, payments etc. will still be dealt through normal management channels.

3. Fundamental Elements of this Policy

- **Confidentiality**

FIE will make every effort to keep confidential the identity of the individual raising a concern if so desired by the individual. In which case, the identity of the individual raising the concern or making the report will not be revealed without his/her prior permission unless FIE is required to reveal the identity of the individual by law.

Where there are deliberate false allegations, no matter how minor, disciplinary actions in the case of employees and blacklisting and/ or legal action for defamation may be taken against the Whistle Blower.

- **Whistle Blowers & Evidentiary Support for Allegations**

FIE encourages Whistle Blowers to disclose their identities when raising concerns. Whistle Blowers should endeavor to provide sufficient corroboratory evidence to justify the commencement of an investigation. An investigation of unspecified wrongdoing or broad allegations may not be undertaken without verifiable evidentiary support. In the event a Whistle Blower wishes to remain anonymous, he/she can request to be provided with a reference in order to keep track of the claim and/or submit more information. However, no information about the outcome or action taken based on information provided by the anonymous Whistle Blower shall be provided to such Whistle Blower unless he discloses his identity to the Head Internal Audit, who shall be obligated to keep that identity confidential.

- **Support**

FIE recognizes that the decision to report a concern is not easy due to the fear of reprisals from those potentially affected. FIE will not tolerate harassment, victimization or undue disciplinary actions and will take any action that is appropriate to protect a Whistle Blower who makes a report in good faith under this policy even if it turns out not to be true after investigations provided that:

- The report was made in good faith.
- The Whistle Blower had reasonable grounds to believe that the report is true.
- The Whistle Blower did not make the report for personal gains.

Whilst all steps will be taken to keep confidential the identity of the individual raising a concern, necessary support actions which may require to be taken, may include formal notifications by Human Resources (HR) to the relevant functions to protect the job environment of the Whistle Blower should he/ she be identified. Follow-up action may be taken by the HR function where the Whistle Blower is located (if such location is known) to ensure no reprisals will take place to the bona-fide Whistle Blower.

Similarly, stakeholders other than employees will also be provided with the necessary support such as protection against any reprisals or discriminations subject to the fulfillment of above-mentioned conditions for whistle blowing.

4. How to raise concerns

Individuals who witness or learn of a potential violation, as explained, can report this matter directly using any of the following channels:

- By escalating the issue to a direct line manager/ HR Department and/ or any other escalating/ reporting mechanism the Whistle Blower feels comfortable with. Email to wb@fie.com.pk; or
- Sending a letter to Head Internal Audit of FIE; or
- Where a concern relates to GCEO, CEO of any subsidiary or any Senior Official of Internal Audit Department of FIE, the Whistle Blower should send their concerns by a letter to Chairman of Audit Committee c/o the Company Secretary of FIE marked "Confidential Complaint".
- SOPs for Reward mechanism will be evolved.

9.16 Discrimination/Bullying/Harassment

Group FIE is committed to eliminate all forms of discrimination, bullying, harassment, and victimization that can create a threatening and intimidating work environment and adversely affect job performance, health, and well-being of employees. Through this policy Group FIE seeks to ensure that no employee, receives less favorable treatment on grounds of their gender, marital status, race, religion or belief, age, creed, color, ethnic origin, disability or is disadvantaged by any conditions or requirements which cannot be shown to be justified. All staff should be treated with dignity and respect. This policy also lays out the procedure for dealing with such cases.

1. Definition

- The fundamental principle underpinning this policy is that discrimination, bullying, harassment, and victimization will not be allowed. Perpetrators of such action leave themselves vulnerable to disciplinary action up to and including termination.
- Heads of Departments are responsible for informing all employees and third parties about the policy and procedure on discrimination, bullying, harassment, and victimization, and that these are disciplinary offences. All managers should take prompt action to stop discrimination, bullying, harassment, and victimization as soon as it is identified. All employees have a personal responsibility to treat other staff members, and those whom they encounter within the work environment, with dignity and respect and to ensure a comfortable work environment.

2. Discrimination

It is defined as an act which has the effect of treating a person less favorably than another on the grounds of gender, race, religion or belief, disability, age, or mental health. This can occur with or without the individual's awareness that it is taking place and would include giving unequal consideration or treatment to people in areas such as recruitment, training, or promotion; attitudes which ostracize or encourage others to ostracize; and inducing or attempting to induce other employees to treat a person unfairly.

3. Harassment

Harassment may be classified as:

i. Verbal Harassment

Statements, remarks, jokes, or innuendoes which are derogatory, or which ridicule or insult a person such as the use of threatening or obscene language; making verbal sexual advances; and attempts to stir up hatred or discontent against groups.

ii. Physical Harassment

Assault, as in physical attack; actions which are intimidating or which ridicule, discomfort or embarrass individuals including but not only, invasion of personal space, making sexual advances in a physical manner; and making threats against an individual or group.

4. Offensive Materials

Displaying or distributing materials which degrade or offend, or the writing/ painting of insults, including pornographic pictures and magazines; graffiti, badges, or other insignia with the purpose of creating hatred or discontent.

5. Bullying

Examples of bullying include derogatory name calling; mimicry or ridicule; insults; exclusion from the normal workplace conversation or social events; spreading malicious rumors; unfair allocation of work or responsibilities; incitement of others to commit these offences.

6. Victimization

Any type of unacceptable behavior which is directly in retaliation against the party or parties to a complaint is victimization.

7. Incident Management

- All incidents will be investigated promptly, if required with the help of specialized teams using various technical means as well as physical monitoring of the individuals or using interrogation means. During investigation of allegations, management will examine the circumstances, and determination on the allegations will be made from the facts on a case-to-case basis.
- Any misuse of this policy by way of false allegations for maligning somebody's reputation, image or for

any other motive, would invite serious repercussions for the complainant, in the shape of disciplinary action which may result in termination of employment.

8. Whom to Contact

Due to its sensitive nature the Complaint procedure for this policy is simple, speedy, and practical, ensuring anonymity of the complainant. The complainant has the following options:

If the employee feels that the matter cannot be resolved by speaking to the offender personally, he/ she should take up the issue with the supervisor (only when supervisor is not the offender) or escalate the matter to the supervisor's superior. If the case remains unresolved and offence continues from the same colleague, the employee should take up the issue with the designated committee members described in the paragraph below, who will investigate and present their findings to the HR Department.

- In cases where complainants do not feel comfortable in reporting the matter to their line manager, they can directly contact the designated Committee personnel who will investigate and recommend corrective and necessary disciplinary action, the committee will comprise of HR representative, Security Representative, Cross functional Line representative, who will then present their findings to the Head of HR.

- If the employee feels uncomfortable in discussing the issue with any of the above, then he/ she can approach and/ or write directly to the Head of HR specifying the situation. Anonymous complaints will not be entertained as some facts need to be established for investigations and they cannot be done with anonymous communications.
9. In regards to sexual harassment, the mandatory process of awareness, dissemination, composition of committee and process of discipline in line with GOP instructions as issued time to time will be adhered.

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