

Code of Conduct Policy

General

The SEZMC Code of Conduct policy outlines our expectations regarding employees' behaviour towards their subordinate staff, colleagues, supervisors, senior management, and the overall company. The company promotes freedom of expression and open communication but expects all employees to follow the defined code of conduct. They should avoid offending, participating in serious disputes or disrupting their workplace. It is expected of them to foster a well-organized, respectful, and collaborative environment.

Scope

This policy applies to all SEZMC employees.

Components of an Employee Code of Conduct Policy

All employees are bound to follow the defined "Employee Code of Conduct" while serving in this company. The components of this policy are given in the following paragraphs.

Compliance with Law.

All employees must follow the company's rules and regulations and comply with all environmental, safety, and fair dealing laws currently in effect and any amended thereof.

Respect at the workplace.

All employees should respect their colleagues. The company does not allow any kind of discriminatory behavior, harassment, or victimization. Employees should conform to the equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

Protection of the company's assets

All employees are responsible for safeguarding the company's tangible and intangible assets, including cash, securities, business plans, and services. Copying, selling, using, and distributing information, software, and other forms of intellectual property is prohibited and will be treated as a violation of company discipline.

Fraud, theft, or illegal activities

Employees must be alert and vigilant in the event of fraud, theft, or other significant illegal activity in this company. If any such activity comes to your attention, the matter must be immediately reported. Failure to report any such activity will be subject to disciplinary action.

Accurate Record-Keeping and Reporting

Accurate record keeping is critical. We are responsible for accurately reporting all business information, business transactions, expenses, and financial figures in a timely and accurate manner. The company's Board of Directors' minutes of meetings, books, records, accounts, and reports must accurately reflect the transactions. All transactions of the company must be properly authorized, completely and accurately recorded on the company's books, and recorded in accordance with generally accepted accounting principles.

Retention and Disposal of Records and Documents

Business records and documents will be retained and destroyed in accordance with the company's record retention policy, as well as the policies and regulatory requirements.

Regulators and Auditors

Compliance with laws, rules, regulations, and ethical standards, etc., is an important element of obligation to the

customer, general public, and other staff. It is essential for our success that we take compliance seriously. All staff members should adhere to compliance as their main responsibility and should be held accountable for all compliance-related activities. We must be open and cooperate with our regulators and auditors and keep them fully and promptly informed of everything that should reasonably be disclosed to them.

Workplace Violence policy: Zero Tolerance policy

The company is committed to providing a safe working environment for everyone that is free from violence. The company has a zero-tolerance policy for acts of violence and verbal or physical behaviour that could lead to or cause workplace violence. Any person who makes threats, exhibits threatening behavior, displays arms and ammunition, uses abusive language, or engages in violent acts that may damage the company's atmosphere and property shall be subject to disciplinary action.

Harassment

Harassment is defined as any verbal or physical behaviour that unreasonably disrupts another employee's work and will not be tolerated. This includes behaviour that targets an employee because of his or her race, color, gender, religion, marital status, age, national origin, disability, or citizenship status. Each of us has the right to be free from improper or offensive conduct at work. Customers, vendors, and visitors will be treated with dignity, respect, and fairness. Unwelcome, insulting, or offensive remarks or actions have no place in this company. This behaviour has a negative impact on performance and business results. To maintain a workplace free from harassment, each of us will exercise good judgement in our relationships with our co-workers. If someone experiences or observes workplace harassment, the incident must be reported to the head of department or any member of management for immediate resolution. The protection against harassment of women at the workplace Act, 2020, is implemented.

Other Acts of Misconduct

Conducts that may result in disciplinary actions are:

- a. **Smoking in prohibited areas:** Smoking is strictly prohibited in all public officers' places at the direction of the copalite Authority. Employees are allowed to smoke only in the designated smoking areas.
- b. **Unauthorized absence from duty:** It is a serious breach of decline. All employees must follow the company's leave policy to the letter and spirit.
- c. **Consumption of intoxicating drinks and drugs:** It is strictly prohibited in SEZMC. All employees must set aside the related law.
- d. **Prohibition from employing children:** No person below the age of 18 years, even on daily wages, will be inducted.
- e. **Criticism of Government:** No employee shall make any statement of fact or opinion in any medium or in any document published under his or her own name, anonymously, pseudonymously, or in the name of another person, in any communication to the press, or in any public utterance.
- f. **Canvassing of non-official or other influence:** No employee shall bring or attempt to bring any political or other influence to bear on any superior authority in relation to any matter pertaining to his services or other obligations.
- g. **Participation in politics and elections:** No employee shall be a member of or associated with any political party or organisation that participates in politics, nor shall they participate in,

subscribe aid to, or assist in any other way in any political movement or election.

- h. Violation of safety or health rules:** Abiding by safety and health rules is in the best interest of employees. Infringement of such rules may cause the spread of disasters or diseases on a large scale.
- i. Spitting within premises:** It is a bad habit, and employees are expected to maintain a hygienic environment in offices and at other work locations.
- j. Tampering with official records:** It is a criminal offence that will be prosecuted severely.
- k. Accepting Gifts:** Acceptance of gifts of all kinds is strictly prohibited. For marketing purposes, only souvenirs may be presented / exchanged with visiting delegations with the approval of the CEO.
- l. Observance of Dress Code:** In order to maintain the corporate values of dress code, the observance of defined dress by all ranks is essential.

Confidentiality of Information:

It is the duty of employees to maintain the confidentiality of all classified information from unauthorised recipients. Information from external parties should also be treated with the same level of confidentiality.

Responsibilities after Leaving SEZMC:

The former employees, after leaving the company, must maintain their professionalism and maintain confidentiality of sensitive information known to them during service.

Use of social media.

There are no restrictions on the use of social media. However, they have to strictly observe the red lines in accordance with the prevailing laws and Constitution of the Islamic Republic of Pakistan.

Reporting Violations / Whistle Blowing

This company has a separate policy on the subject.

Violations of the code of conduct may result in disciplinary action or a penalty as per discipline policy.

ANTI-CORRUPTION POLICY

1. About This Policy

It is company policy to conduct all of our work in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships and in the promotion of the Global Goals.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy (or we have reasonable suspicion to believe this is the case) may have their contract terminated with immediate effect.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Who Must Comply With This Policy

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

3. What Is Bribery

Bribery means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager or relevant authority.

Specifically, you must not:

- a.** give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- b.** accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else; or
- c.** give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- d.** threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

4. Gifts And Hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining company image or reputation, or promoting the company Goals.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret. Gifts must be given in the name of company – not your own name.