

**1. PURPOSE:**

We, the Company, are committed to have quality in our people and our products. We work hard every day to earn a reputation of trust, honesty and candor, while being mindful of our responsibilities to our shareholders, our customers, our partners and each other.

The Company believes that trusting, long-term relationships are built through honesty, openness and fair play. Therefore, all aspects of our business are based on the highest ethical standards.

This Code of Ethics and Business Conduct (“the Code”) describes what acting with integrity means at the Company and how it relates to our core beliefs and leadership.

It outlines principles to guide ethical decision-making and gives practical answers to many of the ethical questions we face in the course of our work. Often these questions are difficult, and the Code directs us to resources within the Company for assistance. Scrupulously and consistently adhering to these guidelines ensures that our customers, employees, suppliers and investors can rely on our integrity which ultimately fosters a climate for our long-term success.

Our commitment to the Code will help ensure that not only our leaders in the Company “walk the talk”, but also each employee reflects our culture, based on trust and truthfulness.

By signing the Code, we agree to abide by its guidelines, including all applicable laws and regulations, as well as all the Company policies and procedures. In doing so, we commit to identifying and reporting any violation of the Code. We shall display moral courage by challenging any action that may undermine the principles in this Code and the Company’s reputation of integrity and honesty.

The Code and your commitment to it, is an essential component of our plan for catapulting the Company to a world-class Company. This policy defines the rules for all staff.

**2. We are committed to Ethical Behavior:**

The Code sets forth the Company’s policies and practices relating to legal compliance and business ethics. It reflects the Company’s core values and high ethical standards. Every director, officer and employee is responsible for reading and understanding this Code and for conducting business on behalf of the Company in accordance with the policies and practices herein

The jurisdiction of the Code spans across the Company, its subsidiaries, affiliates, joint venture and all other entities that directly and / or indirectly are controlled and managed by the Company, including consultants.

**Management Responsibility for Ethics:**

All the Company employees are accountable for their own actions as well as the conduct of employees who are within their span of control. The Company employees are responsible for seeing that the Code and other Company policies, including applicable laws are followed.

They must:

- Make a personal commitment to operate in accordance with the highest standard of ethical business conduct, and communicate commitment to others;
- Ensure that the employees reporting to them receive appropriate compliance and ethics training;
- Maintain a work environment that is respectful and one that encourages open communication regarding ethical problems and concerns;
- Periodically discuss ethical issues and review the Code with employees and third parties reporting to them; and
- Avoid hiring individuals who have the propensity to violate law or rules of the type embodied in the Code.
- Avoid retaining employees who perpetually violate Company policy, applicable laws and / or engage in or promote moral turpitude.

**3. We embrace the Company Code, Policies, and other applicable laws.**

Obedying the law, both in letter and in spirit, is the foundation on which the Company's ethical standards are built. In conducting, the business ethics of the Company, the covered parties shall comply with the Code, other Company policies and all applicable laws and regulations in Pakistan and outside Pakistan's jurisdiction in which the Company does business. Although all covered parties are expected to know the details of these laws, it is important to know enough about the applicable laws to determine when to seek advice from supervisors, managers or other appropriate personnel.

**4. We value and safeguard relationship with our customers.**

**Most valued customer**

A primary objective of the Company is to become the customers most valued supplier. We provide products and services that aim to delight our customers and in doing so we aim to provide a lasting relationship of cooperation and trust.

We extend our customers courtesy, trust and fairness. We conduct our business in a manner that conforms to all applicable laws while also being consistent with good business practices. We provide accurate and complete information in dealings with customers and others. We do not draw on any illegal or unethical practices.

**Safe and High Quality Products**

We are committed to excellence by offering consistent quality and superior products and services. To do so, we meet or exceed customer requirements and specifications, while being mindful of meeting all design and test criteria including performing the required inspection and testing. Our careful attention to product quality and safety has a direct and substantial effect on our reputation and performance. The Company is fully committed to achieving product quality and safety.

**5. We value and safeguard employee relationships.****Respect for employees**

The Company should create and maintain a working environment in which the dignity of employees is respected. A climate in the workplace should be created and maintained wherein there is zero percent tolerance for sexual harassment and where victims of sexual harassment will not feel that their grievances are ignored or trivialized, or fear reprisals.

**5.A**

**In compliance with “Protection Against Harassment of Women at the Working Place Act, 2010”, the company will create and maintain a climate wherein there is zero percent tolerance for sexual harassment and where victim of sexual harassment will not feel that their grievances are ignored or trivialized, or fear reprisals.**

**6. We comply with Health, Safety, Security and Environmental Laws.**

The Company is committed to ensuring the wellbeing of its workers, the people living and working in our communities near our facilities and the environment and will provide the human, physical and financial resources necessary to meet this commitment. These resources will be used to enable employees and contractors to work safely and comply with the law. The Company will protect the environment by employing ecofriendly procedures in all facets of its operations.

Every Company owned and operated facility must demonstrate compliance with all public health and environmental laws pertaining to its operations and consistent with the applicable law.

**7. We value and safeguard our relationships with Suppliers and contractors.**

We seek to behave honestly and ethically at all times with our suppliers, thus ensuring a reputation of being viewed as a dependable customer. We act in good faith and, with due care, with our suppliers and contractors in a manner conforming to applicable laws.

**8. Protect our property and property of others.**

We are personally responsible and accountable for the proper expenditure of company funds, including money spent as travel expenses or for customer entertainment. We are also responsible for the proper use of Company assets over which we have control including assets that customers or others have entrusted in our custody. Company assets must be used for proper purposes. This includes both during and after working hours and by third parties involved with the Company.

Company assets should not be used for personal benefit, sold, loaned, given away or otherwise disposed off regardless of condition or value, without proper authorization.

**We protect Company Confidential information and respect the confidential information of others.**

**What is confidential information?**

Confidential information is information that is generally NOT known to the public and, if improperly disclosed may be harmful to the Company or its customers or suppliers, or helpful to its competitors. The Company possesses valuable confidential information that has been developed over many years at considerable expense. This information includes proprietary information and trade secrets, such as sales, financial, technical know-how, scientific, economic or engineering information, customer lists, marketing plans, technical plans, formula methods, techniques, processes, policies, procedures, programs and codes-regardless of how much information is stored, compiled or memorized-for which the Company takes reasonable measures to keep secret.

**How is confidential information protected?**

We must protect this confidential information as we protect Company's physical and other property and should routinely take precautions to keep the information from being disclosed. Information is only protected if it is confidential and is not publicly available or if the public would have difficulty in acquiring the information except by unlawful means. Confidential information must also be disclosed in circumstances that indicate that it is to be treated in confidence.

Confidential information is protected regardless of whether or not you have a written agreement covering the information. However, it is prudent to have a signed confidentiality agreement to ensure greater protection and to clearly set out the terms that govern your particular circumstances. This helps in demonstrating that the information was disclosed under confidential circumstances.

**Activities that could result in conflict of interest include:**

**Dealing with suppliers and others:** Associates who are involved in making business decisions for the Company must do so using consistent and unbiased standards. These associates must conduct business in the best interest of the Company. Therefore, associates must not accept any gifts, entertainment or gratitude that could influence or be perceived to influence their business decisions or be in a position to derive any direct or indirect benefit or interest from a party having business dealings with the Company.

**Business Courtesies:** We have a wide range of suppliers many of whom consider it standard to provide gifts and entertainment as a gesture of appreciation. The giving or receiving of entertainment by associates acting on their capacity as the Company's associate or by members of an associates family can be problematic as such acts may be construed as attempts to influence the performance of duties.

**Offering, Granting, Demanding and Accepting Advantages:**

No employee may directly or indirectly offer or grant unjustified advantages to others in connection with business dealings, neither in monetary form nor as some other advantage. Employees concluding contract with consultants, intermediaries, agents, or comparable third parties must see to it that they also offer or grant no unjustified advantages. No employee may use his/her job title to demand, accept, obtain, or be promised advantages.

**Receiving Gifts:** Any gift that could create or appear to create an obligation to the donor or influence the business relationship with the donor may not be accepted, if it is by an existing or potential customer, supplier or a competitor. As an exception, if any gift received must be declared to the concerned Line Manager/ Head of Department and must carry Company's Logo on it which would include key chains, diaries, t-shirts, caps, USB sticks, pens etc. up to a maximum price of RS. 3,000/-

**Giving Gifts:** An associate may not furnish or offer to furnish any gifts, entertainment, meals, compensation, credits or anything of value to a person who has business dealings with the Company (suppliers, purchasers and competitors) until authorized by the supervisor.

**We award contracts fairly and without prejudice:** Any bidder for a contract expects us to examine his/ her bid fairly and without prejudice. Employees whose work involves the awarding of contracts must particularly abide by the following rules:

- The employee must inform his/ her supervisor of any personal interest he /she could possibly have in connection with the execution of his/ her professional duties.
- There must be no unfair discrimination for or against any suppliers in their competition for contracts.
- Invitations from business partners may only be accepted if the occasion and scope of the invitation are appropriate and refusing the invitation would be discourteous.
- Gifts from business partners must be refused and returned.
- No employee may have private contracts fulfilled by companies with which he /she has company business dealings if he/she could derive any advantage there from. This is particularly applicable if the employee exercises or is capable of exercising a direct or indirect influence upon having that company receive a contract from the Company.

**We do not speak on behalf of the Company.**

Every employee and associate is NOT an official spokesperson for the Company and may not speak publicly in legal matters and investigations until authorized to do so by the Company. Instead of making any statement on behalf of the Company, the employees must promptly contact their supervisor or other responsible manager to report the inquiry.

**We protect the Company documents and proprietary information.**

We must not provide the Company's files or documents of any kind to anyone without any prior, specific authorization from a supervisor. It is our obligation to protect Company's Proprietary information which includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, information and any unpublished financial data and reports. Unauthorized use or distribution of this information is in violation of Company policy.

In addition to the aforesaid terms and conditions, the Company reserves the right to amend or change this policy, rules & regulations, without any prior notice, at its sole discretion, and the amended rules & regulations shall take precedence over old ones.