



Code of Conduct

June 1, 2024



Title: **CODE OF CONDUCT**

Effective Date: June 1, 2024

Version: 3

1. Purpose and Scope

This Code of Conduct (the "Code") is intended to set out appropriate standards of conduct and behaviour of all persons working for Pakistan Cables Limited (the "Company"), including employees at all levels, Directors, volunteers and interns (collectively "Associates"). The Associates are expected to act with integrity and objectivity, striving at all times to enhance the reputation and performance of the Company. In case of any conflict between this Code of Conduct and any relevant laws and regulations, the stricter rule shall in all cases always be applied.

2. Understanding of the Legal Duties

In all business decisions and actions, the Company endeavors to observe the applicable laws and other relevant regulations. Associates have the obligation to comply with the law and with the principles of this Code. The Company makes dedicated efforts to improve competence and skills in their respective roles by providing appropriate knowledge of the legal requirements related to their duties in compliance with the applicable laws, relevant guidelines and policies of the company and to ensure compliance of applicable regulatory frameworks.

All books, records, accounts and statements should conform to generally accepted and applicable accounting principles and to all applicable laws and regulations and should be maintained accurately.

The Company is committed to promoting fair and ethical business practices. The Associates shall abide by applicable competition laws and shall not enter into understandings, arrangements or agreements with competitors which have the effect of fixing or controlling prices, dividing and allocating markets or territories or boycotting suppliers or customers.

The Company prohibits slavery and human trafficking and is committed to taking steps to ensure that slavery and human trafficking is not taking place in any part of its supply chain or business.

The Company is against corruption and bribery. The Associates shall not tolerate behavior in which unfair means are used to conduct business. The Associates must not offer, receive or accept any benefits from stakeholders that might impair an objective and fair business decision or even create such an appearance.

3. Personal Conduct

The Company is dedicated to upholding high standards of conduct. Associates shall conduct themselves with utmost integrity and professionalism in the workplace or any other location while on Company business.

Bribery, extortion and all other forms of corruption are strictly prohibited.

The Associates must avoid misconduct, intimidating and insulting behavior, verbal onslaught, accusations, misogynist behavior, sexual harassment, ignorance of regulatory framework, spate communication (letters, emails, etc.) without highlighting specific discrepancies, humiliation, pressurizing tactics, coerciveness, disruptive and distractive measures, bullying, disruption of conduct of business, unnecessary interference in management issues, unethically tarnishing image of any person.

4. Conduct in Business Dealings

The Company places a strong emphasis on ethical conduct in business. Associates must recognize that their primary responsibility is to the Company as a whole. Associates of the Company must act honestly, in good faith and in the best interests of the Company as a whole and treat everyone, inside and outside the Company, professionally with respect and equality. They must not take advantage of their position for personal gain, the gain of their affiliates or to cause detriment to the Company.

The Associates must not involve in such practices like manipulation, misuse of privileged information and concealment of facts.

5. Integrity and Honesty

The Company's policy is to conduct its business with honesty and integrity and be ethical in its dealings, showing respect for the interest of all stakeholders including its shareholders, employees, customers, suppliers, partners and society at large.

The Associates must:

- Act, at all times, with honesty, integrity and independence to protect Company's properties, reputation and image, and not partake in dishonest practices such as bribery or corruption, etc.;
- Exercise due diligence, objectivity, sound and independent judgement while performing the duties;
- Not involve themselves in practices with the intention to get any undue advantage either for themselves or their family members.

6. Conflict of Interest

A conflict of interest arises when a personal, professional or business interest of an Associate are potentially at odds with the best interests of the Company. The Associates should conduct their personal and business affairs in a manner such that neither a conflict nor the appearance of a conflict arises between those interests and the interests of the Company.

The Associates should avoid any situation in which he or she, or a family member, might profit personally (either directly or indirectly) from the Company's facilities, its products, or relationships with its vendors or customers.

The Associate must not get into any such business or practice that would tend to influence him/her in a way other than in the best interests of the Company.

The Associates must not get into any business transaction or agreement that would result in the conflict of interest in any manner, other than those in the best interests of the Company.

The Associates must not receive gifts, hospitality, entertainment and other benefits from the outsiders having pecuniary and other interest that influence business decision-making or cause others to perceive that there has been undue influence.

In the event that such a conflict arises, or is perceived to arise, the matter shall at all times be resolved in favour of the Company.

7. Confidentiality

The Company recognizes the critical importance of confidentiality in maintaining trust and safeguarding sensitive information. The Associates have access on a daily basis, by reason of their functions, to information from the Company, its employees, customers, business partners and suppliers, and third parties. The Associates must protect confidential, proprietary and any such information received by virtue of their position in the Company and not disclose such information to anyone, unless the disclosure is required under any law or authorized by the Board of the Company.

The Associates must not use or intend to use the confidential and proprietary information for gaining unfair advantage and personal benefits, unless it becomes public.

The Company uses and treats all personal information about employees, customers, business partners and suppliers as well as other third parties in complete accordance with data protection laws/policy. This data must be protected with the utmost care.

Confidential information may only be released or used with specific permission from the Company and/or where such disclosure is:

- Required to be disclosed to another Associate in the normal conduct of the Company's operations;
- Authorized by the Board of Directors;
- Required by law or regulatory body

An Associate's obligations in respect of confidentiality shall continue after an Associate's association with the Company is concluded.

8. Environmental, Social and Corporate Governance (ESG) Practices

Environment, Social and Corporate Governance (ESG) underpins the Company's activities across all jurisdictions. The Company carries operations in an environmentally and socially responsible manner, while having strong governance practices in place in accordance with the global best practices.

The Company shall prevent the wasteful use of natural resources and minimize any hazardous impact of the development, production, use and disposal of any of its products and services on the ecological environment in accordance with the applicable laws. Associates must adhere strictly to all applicable environmental laws and regulations that impact the Company's operations, promote preservation and sustainability of the environment.

The Company shall adopt most efficient energy management system, prevention of energy waste and utilization of natural resources in responsible manner.

The Company encourages adopting digitalization to enhance efficiency and to protect the environment.

The Company is committed to philanthropic activities, donations, contributions to charities and other matters of social welfare, in terms of sustainable practices. The Company is proud of engaging in volunteering activities supporting charities and activities that align with its values. The Associates are encouraged to participate and actively engage in these volunteering activities.

The Company shall publish and disclose regular reports on its ESG targets, environmental and social impact activities (subject to confidentiality and/or competition concerns).

The Associates shall promote and ensure compliance with Environment, Social and Governance policy of the Company.

9. Diversity Equity and Inclusion (DEI)

Diversity is essential for the Company's business to thrive. The Company respects individuals of all sexes, physical abilities, sexual orientations, nationalities, ages, industry backgrounds, religions, cultural, and ethical beliefs, races, genders, castes, as well as their opinions. The Company is committed to creating a healthy work environment, in a climate of trust and respect, promoting productive work.

The Company shall:

- Promote diverse and inclusive Board and management composition;
- Provide equal opportunities to all employees for employment in the Company irrespective of their culture, race, gender, caste, and religion;
- Promote a work environment free from discrimination, harassment and intimidations of any nature.

10. Role Towards Shareholders/Members and other Stakeholders

The Company recognizes its multiple stakeholders, including its shareholders, customer, suppliers, bankers/lenders, media, regulators, employees, the community etc. All Associates shall ensure appropriate stakeholder engagement in a manner that fosters good relations in accordance with prevailing law, Company policies and industry good practices.

The Associates must:

- Treat all shareholders/members and stakeholders of the Company in a fair and respectable way;
- Act in the best interests of the Company and fulfill their fiduciary responsibilities qua the Company;
- Understand and consider the interests of all stakeholders in the success of the Company.

11. Safeguarding Company's Assets

Safeguarding Company's assets is a fundamental priority. The Company understands that success relies on the protection of valuable resources, both tangible and intangible.

The Associates must use Company's assets, property, proprietary information and intellectual rights for business purposes of the Company and not for personal benefits or gains and to make utmost efforts for the protection and efficient use of the company's assets.

The Associates are responsible for the proper and cautious handling of the assets of the company. Each worker is required to safeguard the Company's assets from loss, harm, misuse, theft, misuse or destruction. Each worker has the obligation to immediately inform his superior of any use of assets contrary to the above.

12. Promoting Safe and Healthy Environment

The Company being a leader in manufacturing and marketing of Wire & Cables, PVC Compound, Aluminium Profiles and Engineering products, highly values the Health and Safety of its personnel, contractors and the environment in which it operates and is committed to continual improvement of its Health, Safety and Environment Management Systems. The Company is committed to providing a safe, competitive and healthy working environment, complying with all laws and regulations governing workplace safety, and to providing the Associates with the training needed to perform their jobs safely. The Associates must strictly observe safety regulations and procedures.

The Company sets, reviews and implements Health, Safety & Environmental objectives as an on-going aspect of continuous improvement.

The Company continually endeavours to set objectives, identify hazards and reduce risks so as to prevent injury & occupational illness and provide a safe and healthy workplace for Associates and contractors. All manufacturing and associated processes must be in a manner that ensures health and safety of personnel.

The Associates must promote preservation of the environment by preventing pollution as a result of controls & monitoring of emissions, effluents and solid waste.

13. Anti-Harassment

The Company prohibits discrimination, harassment and bullying, violence discriminatory differentiation based on sex, physical ability, sexual orientation, nationality, gender identity, race, religion, age, industry background, cultural and ethical beliefs or caste. The Company absolutely prohibits any type of discrimination, violence, threat of violence, intimidation or conduct tending to it in any of the lines of work.

14. External Activities and Public Comments

The Associates must not undertake any external activities during the working hours or, at the expense of Company's duties and commitments.

15. Insider Trading

Maintaining the highest standards of ethical conduct in the financial markets is a cornerstone of the Company's commitment to integrity.

The Associates shall be careful while dealing with personal or business associates and not disclose, divulge or provide any information regarding the Company to anyone except where the same is used as a part of his/ her official obligations and as required for official purpose and shall abide by the Closed Period announced by the Company from time to time and also sign a Non- Disclosure Agreement if the need arises.

The Associates must not indulge in insider trading on the basis of unpublished price sensitive information, subject to exceptions given in section 128 of the Securities Act, 2015, and ensure compliance with all relevant laws and Company's policies on prohibition of insider trading.

16. Political Activities

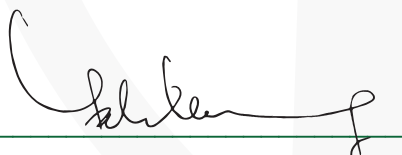
The Company does not support any political party nor does it contribute funds to groups whose activities promote party interests. The Company will promote its legitimate business interests through trade association. The associate should disclose his / her political affiliation (in case of being a nominated member of a political party) with their Line Manager or Head of Human Resources.

17. Non-compliance – Reporting of Misconduct

The Company views breaches of this Code as serious misconduct. Associates who have become aware of any breaches, or potential misconduct of this Code must report the matter immediately to their Line Manager or Head of Human Resources, as may be appropriate.

Any non-compliance or violation of the law or this Code by an Associate will result in action in accordance with the Company's Disciplinary Action Policy.

This Code of Conduct is applicable with effect from June 01, 2024.

A handwritten signature in black ink, appearing to be 'Shakeel', written over a horizontal line.

**APPROVED BY
CHIEF EXECUTIVE OFFICER**