

The Code of Conduct & Ethics (35/v/a)

MPP 001

1. <u>Scope</u>

Policy shall be applicable to the Management and Non Management Staff of Service Industries Ltd. at Plant site & Head Office.

2. Objective

To ensure compliance to all legal requirements in true letter & spirit

3. Child Labor Prohibition

At SIL, we strongly believe in the compliance of National & International laws for elimination of child labor. No one under the age of eighteen (18) years shall be considered for employment.

4. Equal Employment Opportunity

4.1. The Company strongly believes in providing Equal Employment Opportunity (EEO) without any exception ensuring that everyone has fair and equitable access to job assignment, employment conditions, training, and career development.

5. <u>Discrimination</u>

- **5.1.** The Company strongly believes that all employees should be treated equally without any discrimination on the basis of following factors;
 - Sex
 - Race (including nationality, color)
 - Marital status
 - Disability
- **5.2.** In case any employee is aggrieved of any discrimination, he / she will have the right to make a complain to the competent authority through his Department Head who upon its receipt may investigate the same and in the event of any veracity further action including disciplinary measure as the case may be initiated or taken in the circumstances of the case.

6. Harassment

- **6.1.** It is the policy of the company to ensure that none of its employees is harassed including sexual harassment or pressurized to achieve any desired objectives during the course of their employment.
- **6.2.** In case of any complain in this connection shall be viewed seriously by the management and necessary disciplinary action or remedial measures shall be taken accordingly without any exception.

7. <u>Teamwork</u>

7.1. It is the policy of company to ensure harmony and coordination amongst team members. New team members are warmly welcomed and highly facilitated in order to gel them up in existing teams. Old team members are also highly respected as they prove to be role models and act as facilitators for new ones to understand the culture.

8. Information & Communication

8.1. We believe in open communication while maintaining the confidentiality wherever deemed necessary. The information flows are smooth and no hindrances, as regards to bureaucracy of position/designation, can disturb the flow except where considered necessary under confidentiality matters.



The Code of Conduct & Ethics (35/v/a)

MPP 001

9. Smoking

9.1. SILM strictly discourages smoking inside the premises. Though we encourage our team members to quit smoking however in order to facilitate employees, smoking corners have been established at main gates. This is also meant for avoiding any potential hazard because of presence of chemicals within the premises.

10. Fraud & Corruption

10.1. Fraud or corruption counts towards lack of integrity. These two activities are highly discouraged and totally intolerable. Anyone involved in any of such activity like theft, embezzlement, fake attendance etc is terminated with immediate effect.

11. Work Timings

11.1. The company works 8 hours a day and 6 days a week. The Timings to be followed are

Commencement Time: 0830 hrs Lunch & Prayer Break 1230-1330 hrs Jumma Break 1230-1430 hrs Off Timings 1730 hrs

12. Dress Code

12.1. The company follows a formal dress code. However for works, smart casual is admissible. Dress code being representation of a company's culture is supposed to be followed in letter & spirit. Any kind of dress promoting harassment for fellow colleagues, against religious, social & ethical values is strictly prohibited.

13. Minimum Wage

13.1. No employee shall be paid less than the minimum wage determined by the Govt. in accordance with Law.

14. Forced Labor

14.1. The management strongly believes in upholding the rule of law and would not indulge in any forced or bonded labor malpractices.

15. Drug-Free Workplace

- **15.1.** The management strictly believes in maintaining a drug-free workplace. If an employee is convicted of violating a criminal drug statute, management reserves the right to take strict disciplinary action against the defaulter.
- **15.2.** The distribution, dispensation, possession, use or presence in the body system of controlled substances and illegal drugs is prohibited at any time during working hours on company premises including Company's residential areas.
- **15.3.** Use of drugs on or off the job can affect employee's Health, Safety and job performance while the company has no desire to interface unnecessarily upon the private lives of its employees; it must ensure that employee reports to work in a normal condition which will enable them to perform their duties safely and efficiently.

16. Possession of Arms

16.1. The Company prohibits the possession of explosives, ammunition, firearms or any other weapons or devises used to inflict injury on its premises. However security staff is authorized to keep weapons, only which have been licensed and issued by the competent authority.



The Code of Conduct & Ethics (35/v/a)

MPP 001

17. Health & Safety Guidelines

- **17.1.** The Company is responsible for meeting Federal as well as local Health and Safety standards and for establishing & implementing necessary measures to minimize its employees' risk of injury or illness.
- **17.2.** Health & Safely guidelines shall be strictly followed i.e. use of Personal Protective Equipments (PPEs) wherever and whenever required. Health and safety procedures shall be developed and implemented in order to ensure complete adherence to the Safety Rules and Regulations.
- **17.3.** HR Department will ensure that all EHS policies and procedures are communicated at all levels of Company employees.

18. Guidelines for HR Department

- **18.1.** If preliminary investigation of any reported case of non-conformance to the above policy point towards infringement of the provisions of this policy, Manager HR will conduct detailed, confidential and impartial inquiry and report the matter to the CEO.
- **18.2.** If an inquiry reveals that any provisions of the policy have been violated, HR Department will take appropriate disciplinary action against the defaulters, in accordance with Laws / Management practices relevant to the situation.

19. Compliance of Policies

- **19.1.** Manager HR will ensure that all executives / managers are fully conversant with the provisions of this Company policy.
- **19.2.** Head of Departments will also be responsible for ensuring compliance to these policy guidelines, and any deviation of above policy guidelines shall not be acceptable.

GRIEVANCES HANDLING POLICY: [35(V)b]

1. Purpose

To build confidence in the Company by defining how to raise and handlegrievances of employees.

2. Scope

This policy is applicable to all employees working at SIL HO, Murjdke, Gujrat& in Field.

3. Policy

Grievance is the violation of any right guaranteed by law, HR policies and Shared Values of the Company.

An aggrieved employee has right to bring his grievance in notice of Management of the Company for redress.

Management shall take necessary action to redress the grievance.

4. Procedure

Employee shall bring his grievance in writing showing his identity to the notice of HR Head directly or through HOD.

HR shall involve the relevant individuals including the Complainant and find out the facts with the help of HOD concerned.

Enquiry Report with findings shall be prepared for final decision of the management.

In case the grievance stand proved and Complaint is proved justified, the Management will take remedial action and Complainant shall be informed accordingly.

In case the Complaint is based on mere feelings or misunderstanding, counseling may be held with the Complainant or the person against whom the Complaint is made.

The remedial action shall be communicated to the complainant in writing

HR shall ensure implementation on remedial decision and file the record after .completion of the process.

GENERAL GOVERNANCE AND WHISTLE BLOWING POLICY: [35(V)c]

Scope of Policy:

This policy is designed to enable employees of the Company to raise concerns internally and at a high level to disclose information which the individual believes shows malpractice or impropriety.

This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary.

Aims:

To encourage you to feel confident in raising concerns and to question and act upon concerns about any malpractice, embezzlement, forgery or any wrong doing that causes a harm to company, its financials, assets or goodwill.

Types of Concerns Covered:

- 1. Conduct which is an offence or a breach of law.
- 2. Failure to comply with a legal obligation.
- 3. Disclosures related to miscarriages of justice.
- 4. Health and safety risks, including risks to the public as well as other employees.
- 5. Damage to the environment.
- 6. The unauthorized use of public funds.
- 7. Possible fraud and corruption.
- 8. Sexual, physical or other abuse of clients.
- 9. Other unethical Conduct.
- 10. Actions which are unprofessional, inappropriate or conflict with a general understanding of what is rights and wrong.

Confidentiality:

All concerns will be treated in confidence and every effort will be made not to reveal Identity At the appropriate time, however, you may need to come forward as a witness.

Moral Obligation:

It is believed that all such matters shall be reported in good faith. The reporting person should ascertain that information brought forward is:

- 1. In good faith.
- 2. Substantially true.
- 3. Not a malicious or false allegation
- 4. Not meant for seeking any personal gain.
- 5. Is free of all kind of personal biases

Process:

Initially concerns should be raised with immediate supervisor/manager or their superior. This may depend, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the member of staff against whom the complaint is
 made as soon as is practically possible. The member of staff will be informed of their right
 to be accompanied by a trade union or other representative at any future interview or
 hearing held under the provision of these procedures.
- The investigating officer should consider the involvement of the Company auditors and the Police at this stage and should consult with the Chairman / Chief Executive.
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals/ bodies.
- A judgment concerning the complaint and validity of the complaint will be made by the investigating officer. This judgment will be detailed in a written report containing the findings of the investigations and reasons for the judgment. The report will be passed to the Chief Executive or Chairman as appropriate.
- The Chief Executive / Chairman will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Company procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcomes will be passed to the Company Auditors to enable a review of the procedures.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the chief Executive / Chairman, or one of the designated persons described above.