



# CODE OF CONDUCT

The way we do business.

CREATING  
A BETTER  
TOMORROW



CARE



HONESTY



COURAGE



RESPECT



LEAD

# VALUES

- Care
- Respect
- Lead
- Honesty
- Courage

# PEOPLE EXPECTATIONS



# LEADERSHIP EXPECTATIONS

We expect our leaders to maximize our present and seize the future; the underlying leadership philosophy for us is the “Care & Growth” model.

# CODE OF CONDUCT

# PACKAGES WORKING WAY

## Foreword

*Packages Group has built a reputation for conducting its business with integrity, in accordance with highest standards of ethical behavior and in compliance with the laws and regulations that govern our business. This reputation is among our most valuable assets and ultimately depends upon the individual actions of each of our employees.*

*Packages Group Code of Conduct has been prepared to assist each of us in our efforts to not only maintain but enhance this reputation. It provides guidance for business conduct in a number of areas and refers to more detailed corporate policies for further direction.*

*The adherence of all employees to highest standards of integrity and ethical behavior is mandatory and benefits all stakeholders which includes customers, communities, shareholders and ourselves.*

*All Group Companies carefully checks for compliance with the Code of Conduct by providing suitable information, prevention and control tools and ensuring transparency in all transactions and behaviors by taking corrective measures, if and as required.*

***“Packages Code of Conduct applies to all Packages Group companies, employees, business partners, suppliers, vendors, financial advisers, agents, affiliates, and others who act for us within all sectors, regions, areas and functions.”***

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We will regain the business  
we loose, if we keep the  
Trust.

## A message from the Founder, Syed Babar Ali

Trust is the foundation of all interactions.

*It is important that every member of our Group has a clear understanding of our common principles, values and responsibilities that guide our actions and reactions to the happenings around us. This Group Code of Conduct defines the way we do business.*



Syed Babar Ali, Founder



### CARE

Fairness and consideration are integral to our culture.



### HONESTY

Truthfulness, integrity and trust form the backbone of all our activities.



### COURAGE

We stand up for what we believe in.



### RESPECT

We treat people with respect and dignity.



### LEAD

We aspire to lead in everything that we do.

Creating a better Tomorrow

# Care

## Fairness and consideration are integral to our culture

- We provide care through empathy, fairness, trust and openness.
- We care for the communities in which we exist; we are conscious of the impact of our activities on our environment.
- We strive to improve our lives and the lives of others; we care for and grow people.
- We care for all our customers; we succeed when our customer succeeds!

## Environment, health and safety

*We continually improve our environmental performance. To achieve continual improvements in our environmental performance, we need to understand the potential environmental impacts of all our operations and activities, set improvement targets, take the necessary steps to reach these targets and monitor our progress. It is important that everyone should understand their own roles and responsibilities with respect to environmental issues, in order to make the right decisions. All employees should promote resource conservation and minimize waste of paper and other resources.*

### Do's

- *Be aware of and consider the potential impacts of your work on the environment and discuss unclear issues with your supervisor.*
- *Personnel who suffer from any chronic diseases or illnesses that may potentially harm their fellow workers, restrict their work, require special assistance or affect their health further should disclose their medical problem which will be kept in full confidentiality and not used against the concerned in any way.*
- *Play your part to reduce and minimize all kinds of polluting emissions.*
- *Respect your neighbors and the environment around your workplace.*
- *Use resources efficiently and reuse and recycle materials whenever possible to minimize waste.*



### Safety tips

- *Study the relevant job safety regulations and risk assessments before you start work.*
- *Make sure you get the right safety training for your job.*
- *Follow all safety instructions and recommendations.*
- *Always wear the right safety equipment.*
- *Immediately report on any unsafe conditions or practices you notice.*
- *Give positive feedback on any practices you feel will enhance safety.*



## Honesty

**Truthfulness, integrity and trust form the backbone of all our activities.**

- Our actions are ethical and credible. We ensure transparency and fairness in all our dealings.
- We are respectful in our interactions with others and maintain the highest moral standards even in the most difficult situations.
- Our commitment to honesty is evident in our appreciation and welcoming attitude towards candid feedback.
- We remain truthful with ourselves, our people, our organization, our customers and our community in all of our dealings.

### **Responsible business**

- *We comply with all applicable local, national and international laws, regulations and voluntary commitments wherever we do business.*
- *We conduct business transactions with the best interests of Packages Group and community in mind.*
- *We show zero tolerance for corrupt activities of any kind, either in our own operations or when we work with partners.*
- *We support free and fair competition by never becoming involved in price-fixing, market sharing or other anti-competitive practices.*
- *We take care of the company's valuable property and safeguard confidential information.*
- *We communicate with our stakeholders in a clear manner.*
- *We listen to all our stakeholders and seek to engage with them constructively.*

### **Ethics, transparency, fairness and professionalism**

*In conducting business, Packages Group is inspired by and complies with the principles of loyalty, fairness, transparency and efficiency.*

*Any action, transaction and negotiation performed and generally, the conduct of all employees in the performance of their duties is inspired by the highest principles of fairness, completeness and transparency of information, clarity and truthfulness of all accounting documents, in compliance with the applicable laws in force and internal regulations.*

*Bribes, illegitimate favors, request for personal benefits of oneself or others, either directly or through third parties, are prohibited without any exception.*

*It is prohibited to pay or offer, directly or indirectly, money and material benefits and other advantages of any kind to third parties, whether representatives of governments, public officers or private employees, in order to influence or remunerate the actions of their office.*



## Conflict of interest

Packages Group expects all employees to be free from actual or potential conflicts of interest.

A conflict of interest occurs whenever the prospect of direct or indirect personal gain may influence or appear to influence an employee judgment or actions while conducting the business in which employee has a prime responsibility towards the Company and is expected to avoid activities or transactions that clash directly with the interest of the Company. Such situations could arise in a number of ways.

Some of the specifically forbidden situations are outlined below. This list is, however, neither exhaustive nor all inclusive. In case of doubt, the advice of the management should be sought.

- Any employee or any dependent member of his/her family (for the purpose of this code family includes parents, spouse, children and siblings in a position to influence) having an interest in any organization supplying goods or services to the Company.
- Any employee conducting personal business activities on the company premises or using company facilities for such purposes.
- Gaining personally from, performing any work for, or serving as a consultant, advisor, employee, or director of any competitor, supplier, or customer.
- Any employee serving as an officer or Chief Executive Officer (CEO) of any other Company, or in any management capacity for, or as a consultant to any individual, firm or Company seeking to do business with any Group Company or its affiliate, except with the knowledge and prior consent of top management of the Group Company.

- Using Group equipment, assets, or time to engage in non-Group activities, unless expressly authorized in writing by the CEO of your Group Company.
- Engaging in any financial transaction with or possessing or controlling any financial interest in any competitor, customer, or supplier, whose securities are publicly traded on a stock exchange.
- Family Members can work in Packages Group, provided they are not working in the same unit or in any capacity where one position might be able to influence the other one. If the employee's family member has applied for a position at Packages Group, then the employee will not be allowed to participate in the selection or recruitment of that position.  
In case a family relationship develops within the organization or within a Group company after employment, then the employee will be required to inform Human Resource (HR) in writing immediately.

- Accepting compensation or anything of material value (equivalent to Rs. 5000 or above) from third parties that have or propose to have a business relationship with any Group

### Reporting Conflicts:

Any actual or potential conflict of interest has to be reported in writing to the HR and Internal Audit Heads of respective group company.



## Confidentiality

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*Employees shall not keep or make copies of correspondence, documents, records, list of clients or customers without prior approval of the Head of Department. An employee shall not disclose or reveal any information on behalf of the Company to print or electronic media as well as any other information medium, unless he/she is authorized to do so.*

*All copies of correspondence, documents, records, list of clients or customers, shall be surrendered to the Company when an individual leaves the Company's employment or is no longer affiliated or connected with the Company.*

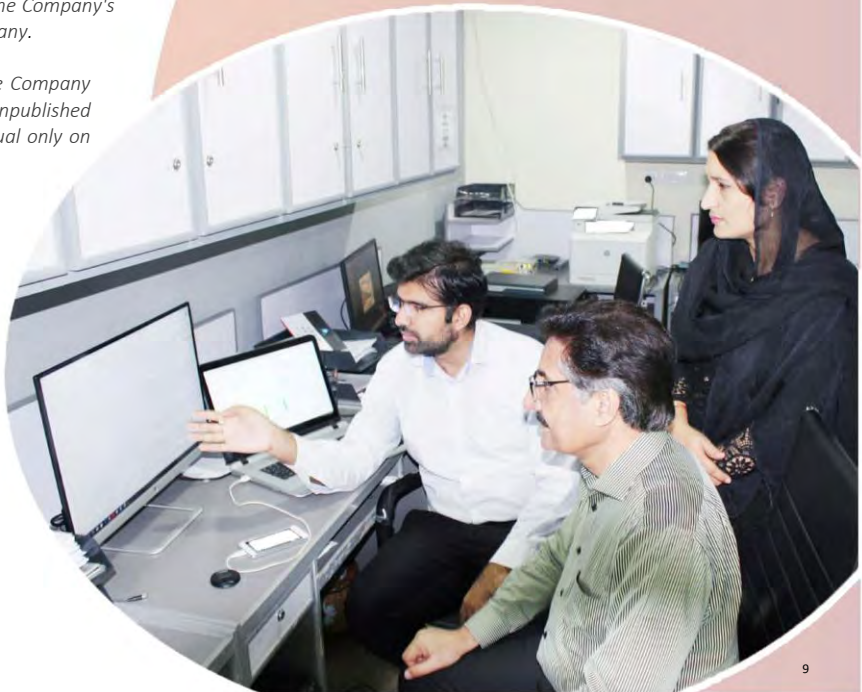
*The Company information and records should be kept within the Company premises and on approved company devices e.g. laptops. Unpublished information may be disclosed to external organization or individual only on "need-to-know" basis upon explicit management approval.*



Syed Hyder Ali



*Honesty forms core of the Packages group, which is the foundation of our success along with care, respect, leadership and courage.*



# Corruption

We show zero tolerance for any kind of corrupt activities.

*Taking or giving bribes is strictly prohibited in our Group companies. We comply vigorously, with the relevant anti-bribery laws. It is also our policy to require all our stake holders working for, or representing, any of the Packages Group Companies, in any capacity, including business partner, suppliers, vendors, consultants, financial advisers, agents, to comply with these laws and practices.*

*Non-compliance with anti-bribery legislation can have serious legal consequences for Packages Group and the individuals involved. It is also important to remember that offering or accepting gifts, hospitality, or expense payments is prohibited if they are of unreasonably high value more than Rs 5000 (this amount to be reviewed every year) or could inappropriately affect business transactions.*

## Allowed:

- *Gifts or hospitality must never consist of cash or cash equivalents. Gifts or hospitality should not be extravagant or excessive in value. Maximum value should not exceed Rs 5000 (this amount to be reviewed every year).*
- *Gifts or hospitality should not be offered in ways that make recipients feel that the giver expects something in return.*
- *Gifts or hospitality should be given and accepted openly in front of others, to make it clear that there is nothing to hide.*
- *Packages Group always pays the travel and accommodation expenses of the company's own personnel.*
- *Normal business courtesies such as paying for a meal or sharing a taxi may be considered as reasonable hospitality.*

Any gift or hospitality which is of greater value and can potentially impact the business dealings, should be immediately reported to supervisor, Head of internal audit and surrendered to HR for appropriate action.



In today's times, business strategy and business ethics cannot be separated from each other. We must emphasize on ethics rather than rules.



Khurram Raza  
Bakhtayari, CFO

# Professional relationships

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*Every employee of Packages Group needs to maintain a professional relationship with suppliers, customers and other stakeholders. They need to ensure that Packages Group inculcates the value of professionalism in all its subsidiaries and among its employees. So, all employees working in the Packages Group dealing directly with suppliers and customers need to make sure that professional relationship is prior to any personal interest of employee. Being in business everyone has to ensure their professional commitment and reputation of the group.*

## Anti-Fraud policy

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Packages Group is committed to the highest possible standards of openness, transparency and accountability in all its affairs. The intent is to promote a culture of honesty and opposition to fraud in all its forms.

Fraud is defined as an intentional, false representation or concealment of a material fact for the purpose of securing an unfair or unlawful gain. Fraud that may involve any of the following matters must be reported. This list is only for reference purposes and should not be considered exhaustive:

- Misrepresentation of facts;
- Misappropriation/theft or misuse of Company's assets such as money, equipment or supplies;
- Unlawfully obtained revenue and/or assets;
- Falsification of revenue, costs and expenses;
- Making profit as a result of insider knowledge of Company activities;
- Bribery or corruption;
- Disclosing confidential and proprietary information to outside parties;
- Forgery or alteration of documents;
- Paying of excessive prices or fees to third party with the aim of personal gain.
- Accepting or offering kickbacks or gifts intended to, or which may appear to, influence the business judgment.

### Policy statement

Fraud in all its forms is wrong and is unacceptable to the Group. All stakeholders must carry out their activities/business in such a way that it prevents fraud from occurring.

### Confidentiality and Non-Retaliation

All reported instances of fraud including the identity of those providing information will be kept confidential in order to conduct an appropriate, fair and thorough investigation. Necessary protection would be provided to the informant. No retaliatory action against any individual for reporting in good faith under this policy will be tolerated. However, false reports would be subject to disciplinary action.

### Blacklisting

Packages Internal Audit department is authorized to blacklist any vendor, service provider, customer, contractor, agency, distributor etc. who are convicted of fraud under this policy. Details of such black listed parties will be shared with all Group Companies to curtail business relations with them and avoid potential financial or reputational loss.

### Responsibility for prevention and detection

All employees are responsible for prevention and detection of fraud, misappropriation and other irregularities. All employees are required to be familiar with the types of fraud that might occur in their respective area, be alert for any indication of fraud or improper activities and maintain controls to avoid such occurrences.

In case of knowledge, suspicion or detection of any such activity by any person, the information must be promptly reported for thorough investigation and prevention. It can also be reported through whistle blowing platform.

Disciplinary action will be taken against any person found guilty as per company policy.

## Dealings in securities/shares and insider trading

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*Packages Group employee shall not trade or pass on inside information at any time to any other person, inside or outside Packages Group. Inside information refers to the information about Packages Group, its business, or other companies with which Packages Group is doing business or negotiating, that is not generally known to the public, but would likely, if known generally, affect the price of a company's shares or influence a person's investment decisions.*

*Packages Group employee or his/her family (spouse, parents, grand-parents, sons and daughters) must not deal in shares of a listed company in which they work and its listed group companies in following circumstances:*

- *during the closed period; or*
- *if he/she is in possession of inside information about the company; or*
- *deal in shares for short term gains (less than six months).*

*If any executive or his/her relatives mentioned above, purchase or sell shares of a listed company in which they work, the concerned executive must immediately inform the Company Secretary, in the prescribed format, about the quantity and price of the shares purchased/sold. The Company Secretary shall pass on this information to the stock exchange and the Securities and Exchange Commission of Pakistan (SECP) in the prescribed format.*

*The concerned executive will also need to report electronically to SECP, on the prescribed format, the purchase or sale of shares using his or her own password/PIN within seven days of the date of transaction.*

*Packages Group employee should not pass on inside information at any time to any other person or encourage another person to deal in shares of its listed group companies on the basis of such information, even if the employee does not gain directly from the arrangement.*

*Packages Group employee should be aware of and comply with any local laws and regulations governing share dealings.*

*Some employees, because of their role and responsibilities, will be in regular possession of inside information or may have access to such information, at particular times of the year. These individuals are referred to as Employee Insiders. The employee will be notified in writing by the Company Secretary if he/she is in this category and hence may not deal in stock until he/she obtains written confirmation that he/she may deal or has been taken off the Insider List. The Company Secretary may be contacted for advice in this area.*

# Courage

**We Stand up for what we believe in.**

- *We are passionate and courageous in pursuing our dreams.*
- The other side of fear is freedom; we value freedom.
- We have the audacity to look at new challenges and adjust our sails accordingly.
- We stress upon suspending self-interest for the greater good.



Syeda Henna Babar Ali

*To be honest, sincere and truthful towards the organization and your colleagues in adversity, even if it is detrimental to your personal agenda.*

Packages Group expects its employees to show courage in all their dealings and conduct by working with the highest professional and ethical standards. They should have the courage to speak up if they identify any violation of Code of Conduct, rules and regulations of the company, group or country.



## Whistle blow

Packages Group is committed to highest standards of ethical, moral and legal business conduct. In line with this commitment and the company's commitment to open communication, this policy aims to provide an avenue for employees to raise concerns with reassurance that they will be protected from reprisals or victimization for whistle blowing.

The types of issues which can be reported under this policy include but are not limited to:

- Breach of the Code of Conduct;
- Corruption and bribery;
- Harassment;
- Misappropriation of financial data/reports;
- Misuse of company's assets;
- Violation of applicable laws and regulations;
- Actions raising safety, security, and environmental concerns;
- Damage to company's reputation or business; and
- Disrespect and/or discrimination of employees on the basis of race, color, gender, ethnicity, age, nationality, ancestry, religion, physical/ mental disability or marital status.

## COMPLAINT REPORTING AND INVESTIGATION PROCEDURE

- Any employee, contractor or stakeholder who believes that he/ she has been a victim of discrimination, harassment, or becomes aware of any activity which is not in the best interests of the company or breaches the Code of Conduct or law should immediately report the issue. Confidentiality of all complaints would be ensured and appropriate remedial action would be taken after thorough verification/ investigation of underlying facts and details.
- All personnel reporting must ensure confidentiality of the information and must not share or spread any unsubstantiated/ false claims. Spreading false claims could result in disciplinary action against such personnel.
- Whistle blowing complaints can be raised through communication means mentioned in the respective whistle blowing policy or by directly approaching the Head of Internal Audit of respective company or send email to respective company whistle blowing email address.



**Note:** Complainants have the right to raise complaint anonymously but they are encouraged to include contact information which would be useful during investigation. Confidentiality and protection of complainant's identity would be ensured. Internal Audit Department may involve/ consult relevant departments for investigation of the complaint.

# Respect

We treat people with respect and dignity

## Equal Opportunity Employer

*Packages Group recognizes the value of striving for a balanced work force and is committed to the principles of equal opportunity, equality of treatment and creating a dynamic environment where diversity is valued as a source of enrichment and opportunity. All phases of the employment relationship – including recruitment, hiring, training, promotion, compensation, benefits, transfers, layoffs and leaves of absence will be carried out by all managers without regard to any race, color, religion, gender, age, ethnicity, national origin or disability.*



## Abuse of Alcohol or Drugs and Gambling

*All employees shall personally contribute to promoting and maintaining a climate of common respect in the workplace. Particular attention should be paid to respect the feelings of others.*

*No employee in Packages Group shall work under the effect of alcohol or drugs, or substances with similar effect.*

*It is strictly prohibited to:*

- *Hold, consume, offer or give for whatsoever reason, alcohol or drugs, at work and in the workplace.*
- *Smoke in areas where smoking is not allowed.*
- *Gamble or bet within the workplace.*



# Workplace harassment

We believe that it is the right of every employee at Packages Group to work in a dignified environment. To achieve this and to promote a harmonized work culture, we will provide equal opportunities for development and growth regardless of gender, race, color, creed or religion.

‘Harassment’ means any unwelcome sexual advance, request for sexual favors or other verbal or written communication or physical conduct of a sexual nature, or sexually demeaning attitudes, causing interference with work performance or creating an intimidating, hostile or offensive work environment, or an attempt to punish the complainant for refusal to comply to such a request or is made a condition for employment. Its scope covers both male and female employees.

**There are three significant manifestations of harassment in the work environment:**

## a) Abuse of authority:

A demand by a person in authority, such as a supervisor, for sexual favors in order for the complainant to keep or obtain certain job benefits, be it a wage increase, a promotion, training opportunity, a transfer or the job itself.

## b) Creating a hostile environment:

Any unwelcome sexual advance, request for sexual favors or other verbal or physical conduct of a sexual nature, which interferes with an individual’s work performance or creates an intimidating, hostile, abusive or offensive work environment. The typical “hostile environment” claim, in general, requires finding of a pattern of offensive conduct, however, in cases where the harassment is particularly severe, such as in cases involving physical contact, a single offensive incident will constitute a violation.

## c) Retaliation:

The refusal to grant a sexual favor can result in retaliation, which may include limiting the employee’s options for future promotions or training, distorting the evaluation reports, generating gossip against the employee or other ways of limiting access to his/her rights. Such behavior is also a part of the harassment.

**Furthermore, harassment can occur in a variety of circumstances such as:**

- Advances, propositions, suggestions or pressure for social activities outside of work, where it has been made clear that these are unwelcome.
- Conduct which is discriminatory, intimidatory, physically or verbally abusive, including the display of explicit material, humor or comments of a sexual or racial nature or related to a person’s abilities or disabilities whether directed specifically at any particular individual or not.
- Spreading malicious rumors or insulting someone by word or behavior (particularly on the grounds of age, race, sex, disability, sexual orientation and religion or belief).
- Unfair treatment or misuse of power and position.
- Making threats or comments about job security without foundation.
- For further details please refer anti-harassment policy of respective company.

## Process for filing a complaint

1. The employee (the victim) shall raise complaint in accordance with the Anti-Harassment Policy of the respective group company. The complainant may wish to discuss the case with immediate supervisor for guidance in this regard.
2. The Chief Anti-Harassment Officer (CAHO), usually HR Head of respective company, will study the complaint in detail and determine if the complaint comes under the purview of the Anti-Harassment Policy. In case if the complaint is outside the purview of the Anti-Harassment Policy, the complainant would be informed accordingly by giving reason(s). In case the complaint is found to be under the purview of the Anti- Harassment Policy, the CAHO will then forward the complaint to Special Inquiry Committee established for this purpose. During this course, the CAHO may contact the complainant by phone or may require the complainant to meet in person, so that the details of the complaint can be further clarified.
3. In order to block the implication of the misuse of this Policy, the basic requirement for the implementation of its clauses and for formal undertaking of an inquiry, the following two conditions are hereby kept as pre-requisites:
  - All allegations must either have at least one witness, or in case of no witness, any other written or recorded or pictorial evidence or in case of no such evidence to support the allegations, at least a circumstantial evidence or an inference based on incidental logic and reasoning.
  - The complainant shall declare and disclose her/his full name and correct identity, at the time of filing of the complaint, which will be kept confidential at all times.
4. No anonymous or conditional complaint shall be entertained.
5. All complaints shall be reported and investigated in accordance with this policy and any other applicable laws and regulations on Harassment.

## Email, computers and network security

*All employees must follow the Group's policy to limit Internet access to official business during work.*

*All employees using Company's Internet connection and e-mail accounts are acting as representatives of Packages and therefore should act accordingly, in order to avoid damaging the reputation of the Company.*

*The introduction of viruses or malicious tampering with any computer system, is expressly prohibited.*

*No employee shall visit illegal or unethical sites nor distribute illegal or unethical material. Obscene, derogatory or racially intolerant websites and material is also forbidden.*

*Activities that compromise network security are strictly forbidden. The disclosure of system IDs, passwords or information which can cause penetration into our network and security framework, is also not allowed. Employees shall not place Company material (copyrighted software, internal correspondence, etc.) on any publicly accessible Internet computer without proper permission.*

*The Company reserves the right to inspect the computer system of any employee of Packages Group for violations of this policy.*

## Protection of company's assets and proprietary information

*Packages Group's physical and intangible assets, as well as its proprietary information are the key to the Packages Group's success. They should be used only to achieve business goals and should be protected to preserve their value. Any use of Group Company's assets or proprietary information by any employee in other business or personal activities is forbidden. All Group Company assets and proprietary information must be returned to the Group Company on cessation of employment.*

*Employees may know considerable amounts of proprietary or other information i.e. "confidential information" as part of their job which may be in written, electronic, or any other form. It should not be disclosed to anyone outside Packages Group without the express permission of his/her supervisor.*

*It is the duty of every employee to protect, use and operate all the corporate assets (all moveable and immovable assets) with utmost care, due diligence and honesty. In case, it is observed by any employee that the corporate assets are being misused/mishandled by some other employees/individuals, the matter should be immediately reported to the management of the respective Group Company.*

*All Group employees are responsible for the security and proper use of the Company's physical and intangible assets under their control and of third-party assets in their care.*



**Muhammad Afzal,**  
Group Head IT.

Think before you click.



## Lead

We aspire to lead in everything that we do.

### Leadership opportunity

- We expect our leaders to maximize our present and seize the future; the underlying leadership philosophy for us is the “Care and growth model”.
- We believe in possibilities; nothing is impossible.
- We take leadership position in all our markets.
- We aspire to build authentic leaders who say what they mean and mean what they say.
- We live by our values and, appreciate and recognize the same in others.
- We add value daily and look for future opportunities. We are committed to making a great organization.

Packages Group encourage its employees to lead from the front and provides opportunities for learning and development to its young and seasoned executives to grow and take up senior roles and become future leaders.



Humaira Shazia,  
CEO DIC.

You don't have to be a leader to lead. You need to demonstrate the values of empathy, courage, honesty, humility and innovation in whatever you do.

## Public activities and relationships with stakeholders

*Agreements with all our stake holders working for any of Packages Group Company in any capacity including business partner, suppliers, vendors, financial adviser, agents or consultants shall clearly specify the services to be performed for the Company, the amount to be paid, and all other relevant terms and conditions. All payments and transactions shall be supported by documents.*

*Relationships and dealings with Government officials, external agencies, parties and individuals at all times should be such that the Company's integrity and its reputation shall not be damaged, if details of the relationships or dealings were to become public knowledge. Payment of any nature to government officials for any reason whatsoever is strictly prohibited. Furthermore, no employee of Packages Group shall support any political party or contribute to the funds of the groups whose activities are intended to promote any party interests.*

*No member of Packages Group shall provide any assistance or funding (including charity or donation) to prescribed individuals/entities as notified by the concerned government, laws and regulations or by UN Security Council Sanctions Committee.*

*It is the responsibility of every employee to exercise good judgment so as to act in a manner that will reflect favorably on the Group. The Group employees should make statements to the media, or publish articles in the newspapers, etc., only with prior authorization of the respective CEO.*

*Due care should be taken while discussing the Company performances or plans with outsiders. Any Group employee having questions on how to comply with this requirement should seek guidance and advice from the respective supervisor.*



# Code of Conduct Compliance

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## Compliance

*Packages Group will enforce this Code of Conduct by investigating any reports of misconduct or rules being broken. Where infringements are proven, actions will be taken to prevent this happening again.*

*This process will be full and fair for everyone involved. We will ensure confidentiality for anyone reporting violations. Those reporting potential wrongdoings in good faith will not be fired, suspended or discriminated against. Correspondingly, action will not be taken against anyone accused of wrongdoing before an accusation has been duly investigated.*

*If it is established that the Code of Conduct has been broken, Packages group may take disciplinary action and in serious cases even terminate employment agreements.*

### **Code of Conduct for partners:**

*We also require all agents, consultants, vendors and business partners who work on behalf of Packages Group to comply with these same laws and practices that defines our conduct and how we do business (including Packages Group sustainability requirements for suppliers).*

### **Whom to Report:**

*If you have any questions about issues related to this Code of Conduct you may wish to contact your own supervisor first or send your questions to your respective Head of Internal Audit.*

*If you see or suspect misconduct, make a report immediately. We encourage you to speak directly to your own supervisor. You can also report your concerns anonymously in confidentiality through whistle blowing channel.*



**Waqas Munir,  
Group Head Audit**

*Packages Group is recognized for its strong cultural and ethical values. Likewise, it expects all its employees to demonstrate exemplary conduct during all their dealings. Compromising ethics almost always leads to failure!*



## *Ask Before you act*

*It's important that you fully understand the Code of Conduct and what it means for you. You must take responsibility for learning the rules and ensuring that they are followed everywhere you work.*

*If you need more information or advice on the Code of Conduct, don't hesitate to get in touch with someone who can help you. Such people include your own supervisor, Head of Internal Audit or Head of HR of respective group company.*

*This Code of Conduct is a summary of the key ethical policies, principles and guidelines relating to Packages group operations. The company's official policies and guidelines are available at intranet portal of respective companies.*

**Note:** *Certain jobs within Packages Group are covered by further specific policies and guidelines that need to be understood in addition to the rules set out in this code of conduct.*

## EXHIBIT

**Name**

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**Company**

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**Department**

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**Designation**

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**Joining Date**

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*I do hereby certify that I have read and understood the contents of Code of Conduct of Packages Group and I will make sure that I comply with the clauses of Code of Conduct if I fail to do so then company can take disciplinary action against me. Also, if I find someone else indulging himself/herself in such activities which put company's reputation at stake, then I will blow the whistle immediately to my Line manager/Head of Internal Audit or use whistle blowing channel.*

**Signature of Employee**

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**Date of Signing**

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