

Punjab Model Bazaars Management Company (PMBMC)

CODE OF CONDUCT

2020 - 21

Code of Conduct

1.1 Introduction

The Code of Conduct (this “Code”) establishes a standard of conduct for Directors and employees of the Punjab Model Bazaars Management Company (PMBMC); deters wrongdoings and promotes honest and ethical conduct of Directors and employees. It also promotes compliance with applicable laws, rules and regulations which apply to the Company, its Directors and employees.

This Code is not meant to cover all possible situations that may occur. It is designed to provide a framework of reference against which activities shall be measured. The employees should seek guidance when in doubt about the proper course of action in a given situation, as it is ultimately the responsibility of the employee to “do the right thing”. This Code has been prepared in line with the provisions of Code of Corporate Governance for Public Sector Companies. Furthermore, where a difference arises between the Code and Law, the Law shall prevail.

The employees should always be guided by the following basic principles:

- i. Avoid any conduct that could damage or risk the Company or its reputation;
- ii. Act legally and honestly; and
- iii. Put the Company’s interests ahead of personal or other interests.

The Code is a dynamic document, which may change over time. The Code is a part of offer letter and not an employment contract between the employee and the Company. Violations of any terms of this Code may lead to strict disciplinary action and also result in termination of employment Contract.

This Code does not supersede, change or alter any Company policies and procedures already in place or which may be put in place, from time to time. This Code does not intend to and create any right in any employee, customer, supplier, competitor, shareholder or any other person or entity.

To achieve the above objective, all the employees of the company must fully comprehend and follow the standards of ethics and business practices.

1.2 Application and Validity

This code of conduct applies to all employees and Directors of the company.

1.3 Compliance with laws, rules and regulations

The Company, its Directors and employees are bound by the laws and regulations. Compliance with all applicable laws and regulations must not be compromised. If an employee or Director fails to comply with an applicable law, rule or regulation, he/she may be subject to disciplinary measures, up-to and including termination of employment. To avoid inadvertent violations, the employees are encouraged to ask questions when there is uncertainty. To encourage open communication, you may discuss the matter with the Company Secretary.

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PMBMC expects that its employees shall:

- i. Conform to and abide by the Company's rules and obey all lawful orders and directives, which may be given from time to time.
- ii. Comply with and observe all applicable laws, regulations and Company's policies, wherever the company operates.
- iii. Not harm the repute of PMBMC during the job or after separation from it.
- iv. Not be a member of any political party, take part in, or assist in any way, any political movement in or outside of Pakistan or relating to the affairs of Pakistan and shall not express views detrimental to the ideology, sovereignty or integrity of Pakistan. It may result termination of employment.
- v. Not canvass or otherwise interfere or use influence in connection with or take part in any election as a candidate to a legislative/local body or issue an address to the electorate or in any manner announced or allowed to be announced publicly as a candidate or prospective candidate whether in Pakistan or elsewhere. However, he/she may exercise right to vote.
- vi. Not bring or attempt to bring political or other pressure/influence directly or indirectly to bear on authorities/superior officers or indulge in derogatory pamphleteering, contribute, or write letters to the newspaper, anonymously or in his/ her own name with an intent to induce the authority/superior officers to act in a manner inconsistent with rules, in respect of any matter relating to appointment, promotion, transfer, punishment, retirement, or for any other condition of service of employment.
- vii. Serve the Company honestly and faithfully and shall strictly serve the Company's affairs and the affairs of its constituent, promote the interest and goodwill of the Company.
- viii. Disclose and assign to Company all interest in any invention, improvement, discovery or work of authorship that employee may make or conceive, and which may arise out of his/her employment with Company. If employment is terminated, all rights to property and information generated or obtained as part of employment relationship shall remain the exclusive property of the Company.

1.4 Conflict of Interest

A conflict of interest shall occur when personal interests of a director or an employee interferes, or even appear to interfere, in any way, with the interests of PMBMC. Conflicts of interest may also arise when an employee acts or have interest, or a member of the employee's family have interest, that may make it difficult for the employee to perform his/her duties objectively and effectively. When a potential conflict of interest arises, it is important that the employee should declare his/ her interest, act with great care to avoid such conflict.

The employee shall not hold a position of director, consultant, employee, representative or agent with any supplier, competitor or Company either doing or seeking to do business with company If any immediate family member holds a position with any Company doing or seeking to do business with company, a written disclosure must be made promptly to his / her Manager / Admin & Human Resource Department who will bring into notice of the CEO/COO.

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If any employee wishes to undertake a non-executive director, trustee or supervisory position with external Company's, the employee must obtain the consent of the CEO/COO.

If the employee becomes aware of an actual, potential or apparent conflict of interest, he/she shall bring it to the attention of the Head of Department on immediate basis and may write directly to Chief Executive Officer of PMBMC. Furthermore, such person shall not take part in relevant discussion, decision and action.

Examples of situations where conflicts of interest may arise and the principles that shall be applied include, but are not limited to, the following:

- i. An employee shall not solicit or accept, directly or indirectly, any cash or monetary equivalents, objects of value or preferential treatment from any person or business that has or is seeking business with PMBMC, where doing so may influence or appear to influence an employee's judgment.
- ii. Employees shall not enter into any business dealings on behalf of the Company with a family member, any business controlled by a family member or any other connected person with whom business dealings may result in a potential conflict of interest without first disclosing this to the Company and obtaining approval.
- iii. Employees of the Company must ensure that they deal with stakeholders in a way that avoids their independent judgment on behalf of the Company being influenced by personal advantage, or any appearance that this may be the case.
- iv. An employee shall not have an interest in any other business if that interest compromises or appears to compromise an employee's loyalty to PMBMC.
- v. Neither the employee nor any of his/her blood relationship can run any type of business in Model Bazaar. It's strictly prohibited and will fall under sheer violation of COC, under major offence.
- vi. Simultaneous employment or serving as a consultant to or employee (with or without consideration) of any other entity is strictly prohibited.

Some examples for avoiding conflicts of interest are as follow:

- i. The employee shall deal with all suppliers, customers, and all other persons doing business with the Company in a completely fair and objective manner without favor or preference based upon personal financial or relationship considerations.
- ii. The employee shall not accept from or give to any supplier or, customer any gift or entertainment except as allowed under Section III (Gifts, Meals and Entertainment) below.
- iii. The employee shall not do business on behalf of the Company with a member of his/her family or a close relative, unless the transaction is disclosed in writing, to the Chief Executive, who determines that the transaction is on arms-length terms and is consistent with the purposes of this Principle. A close relative would include a spouse, parent, parent-in-law, sibling, sibling-in-law, child or son/daughter-in-law.
- iv. The employee shall not, directly or indirectly, have a financial interest with any individual, firm or company which does or seeks to do business with the Company whether as a customer, supplier, contractor, sub-contractor or service provider.

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- v. The employee shall not use his position in the Company to gain an unfair advantage over a customer, supplier, contractor or service provider including to the extent of obtaining any goods or services on credit, rebate or discount which is not available generally.

1.5 Whistle Blowing Policy

In line with its commitment, PMBMC expects its employees and others that they deal with Stall holders/any other stake holder, who have serious concerns about any aspect of PMBMC's work, to come forward' and voice those concerns.

Specific examples of circumstances where a Whistle Blower can raise concerns could include but shall not be limited to:

- i. Over-invoicing, demanding, seeking or acceptance of kickbacks, payment for goods or services not supplied or rendered and any act of fraud, bribery and corruption;
- ii. Forgery of company documents and financial instruments like cheques;
- iii. Misappropriation/embezzlement/misleading of any type of transactions with any vendors/stakeholders of the Bazaar/Company;
- iv. Theft or misappropriation of company's funds and property;
- v. Conflicts of interest and abuse of office/authority/position;
- vi. Disclosure of business secrets and other confidential company information obtained during the course of employment;
- vii. Usage of confidential information to obtain a personal reward or advantage;
- viii. Compromising the interests of PMBMC in dealings with stall holders or contractors, consultants or suppliers;
- ix. Discrimination towards any staff member, customers or any stakeholders on the grounds of sex, race etc.; and
- x. Engaging in illegal or unlawful acts.

PMBMC will make every effort to keep confidential the identity of the individual raising a concern if so desired by the individual. In such case, the identity of the individual raising the concern or making the report will not be revealed without his/her prior permission unless PMBMC is required to reveal the identity of the individual by law.

An investigation of unspecified wrongdoing or broad allegations may not be undertaken without verifiable evidentiary support.

Where there are deliberate false allegations, no matter how minor, disciplinary actions in case of employees and blacklisting and/or legal action for defamation may be taken against the Whistle Blower.

How to report

Concerns regarding Ethical Matters

Improper or illegal activities, possible violations of internal guidelines, regulations or the Code of Ethics shall be reported to the Board of Directors of the company as follows:

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Via Mail: Through letter at the registered address of the Company by addressing the CEO / COO

Via email: ceopmbmc@gmail.com

Concerns Regarding Accounting and Auditing Matters

Chief Internal Auditor shall be responsible to deal with hints that only have to do with accounting and auditing. Tip-offs shall be sent to CIA in the following manner:

Via Mail: Through letter at the registered address of the Company by addressing the Chief Internal Auditor

Via email: ciapmbmc@gmail.com

1.6 Gifts, meals and entertainment

The employees shall not seek, accept, offer, promise, or give (directly or indirectly) anything of value including payments, fees, loans, services, entertainment, favors or gifts from or to any person or firm as a condition or result of doing business with the Company. The employee may accept gifts, services or other items of value under the following circumstances:

- i. The employees may accept meals, travel, lodging, refreshment, or other normal business courtesies of reasonable value either in the course of a business meeting or to satisfy a reasonable business purpose of the Company. The reasonable value shall be determined by the Board of Directors of the Company.
- ii. The employees may accept meals and entertainment, such as the occasional sporting event, provided that the employee does not do so frequently or under circumstances where the judgment could be influenced, or where the cumulative value of the entertainment is excessive. Any meals and entertainment involving substantial travel, or an extended number of days cannot be accepted without the permission of the Chief Executive.
- iii. The employees may accept gifts of reasonable value including for commonly recognized events or occasions, such as a promotion, new job, and wedding, retirement, birthday or holiday.
- iv. The employees may accept discounts or rebates on merchandise or services that do not exceed those available to members of the general public.
- v. The employees may receive awards from civic, charitable, educational or religious organizations of reasonable value in recognition of services and accomplishments.
- vi. The employees may receive gifts, gratuities, amenities or favors received because of family or personal relationships when the circumstances make it clear that it is those relationships rather than business of the Company that are the motivating factor.

If the employee receives gifts, services or other items of value under the above, the employee is required to intimate the same in writing to the Manager HR (or with respect to the Manager HR, the Chief Executive) forthwith. The Manager HR shall maintain a record of same.

If the employee is offered gifts, services or other items of value not in conformity with the exceptions noted above, or if either arrives at your office or home, you must report it to your superior in writing with a copy to the Company Secretary (or with respect to the Company Secretary, the Chief Executive).

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1.7 Loans and other Credit Facilities from Financial Institutions

Any loan and/or credit facility obtained on false representations including, but not limited to, preparing of forged financial statements shall be deemed to be a violation of the Code.

1.8 Integrity

Integrity on the job means;

- i. Treating staff fairly;
- ii. Comply with all laws, regulations, rules, and policies that govern the conduct of PMBMC business, wherever that business is transacted;
- iii. Ensure that all transactions are handled honestly and recorded accurately;
- iv. Avoid conflicts of interest, both real and perceived;
- v. Not to use PMBMC assets, information, or relationships for personal gain;
- vi. Refrain from any acts of retribution or retaliation against an employee who has properly reported a business conduct issue or question;
- vii. Respect the rights of all employees to fair treatment and equal opportunity, free from harassment; and
- viii. Conduct all business dealings with honesty and fairness.

1.9 Outside directorship and other outside activities

Outside of the Company, no activities shall be pursued if such activities will interfere after the employee's responsibilities for the Company, or if they create risks for the Company's reputation or if they in any other way are likely to conflict with the interests of the Company.

Unless requested by the Company to take up a particular position or activity, an employee shall pursue outside activities and positions at his own risk and within his spare time only subject to the condition that such position or activity does not in any manner whatsoever and affect/impact the employee in the performance of his official duties and responsibilities and provided further that it is permissible to so do in terms of the employees' employment contract with the Company.

An employee shall not seek directorship in any company (public or private) without the prior written consent of the Chief Executive (and in case of the Chief Executive, the Board of Directors); and the directorships in other companies shall be capped at 4.

An employee shall not participate, directly or indirectly, in a joint venture, partnership or other business arrangement with the Company.

1.10 Corporate Opportunities

When presented with opportunities related to the Company's business interests, the employee must first offer those opportunities to the Company. The employee shall not take for himself personally, or for members of his family and friends opportunities that are discovered through the use of Company property, information or position; nor use Company property, information, or position for personal gain. The employee may participate in such opportunities only with the prior written approval of the Chief Executive (or, with respect to the Directors, written approval of the Board of Directors).

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1.11 Fair Dealing

The employees shall deal honestly and ethically with the Company and with the Company's customers, suppliers, employees and other stakeholders.

The employees shall treat people fairly. He shall not take unfair advantage of anyone through manipulation, concealment, abuse of privileged or otherwise undisclosed information, misrepresentation of material facts or any other unfair-dealing practices.

The employees are prohibited from taking any action (or inaction) to improperly influence, coerce, manipulate or mislead the Company's internal or external auditors; or to prevent such persons from performing a diligent audit of the Company in accordance with their respective mandates

1.12 Accuracy and integrity of Books, records and accounts

All Company books, records and accounts must accurately reflect the nature of the transactions recorded. Books and records include but are not limited to ledgers, vouchers, bills, invoices, time sheets, expense reports, payroll and benefits records and other essential Company data. All assets and liabilities of the Company must be properly recorded in the regular books of account. No undisclosed or unrecorded fund or asset of any amount shall be established for any purpose. No transaction or arrangement shall be structured to circumvent the Company's internal control systems. No false or artificial entries shall be made for any purpose. No payment shall be made, nor is purchase price agreed to with the intention or understanding that any part of such payment to be used for any purpose other than that described in the document supporting the payment.

1.13 Protection and Proper use of PMBMC Assets

An employee shall be expected to protect PMBMC assets and ensure their efficient use, and is prohibited from engaging in theft, carelessness, or waste. All PMBMC assets should be used for legitimate purposes, but incidental personal use may be permitted if ancillary to a PMBMC purpose. An employee shall also be prohibited from making any improper use of property such as funds, software, e-mail systems, voice mail systems, computer networks, vehicles and facilities for personal benefit or profit.

1.14 Work Ethics

All PMBMC employees shall:

- i. Respect fellow colleagues and work as a team, be courteous and not let any personal differences affect the work.
- ii. Ensure good attendance and punctuality and demonstrate a consistently good record in this area.
- iii. Maintain a standard of personal hygiene and dress appropriately for attendance at work.
- iv. Conduct all matters related to their work professionally, efficiently and economically.

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- v. Safeguard both the tangible and intangible assets of Company and will not use Company's assets for his/ her personal benefits except where permitted by the Company and not to use any facility of the Company including a conveyance and telephone to promote personal activities, or carry weapons in the Company's premises unless so authorized by the management, or carry on any personal activities during office hours, or subject Company's official to abuse.
- vi. Not use social media, personal emails and other entertainment activities like songs and movies during office hours.
- vii. Not indulge in any kind of harassment or intimidation whether committed by or against any person. Shall not use language, written or spoken in intra-office or inter-office communication(s) or communication(s) with individual(s) outside the office that may contain any statement or material that is offensive to others.
- viii. Never use Company's system to transmit or receive electronic image or text containing ethnic slurs, social epithets or anything that might be construed as harassing, offensive or insulting to others.
- ix. Help in maintaining a healthy and productive work environment and shall not engage in selling, manufacturing, distributing, using any illegal substance or being under the influence of illegal drugs during the course of employment.
- x. Ensure strict adherence to all health and safety practices.
- xi. Not give any interview in the print/electronic media or have photograph displayed or act in television/stage plays or in cinema on behalf of PMBMC without having permission from the CEO/COO.
- xii. Intimate HR Manager of any changes in the personal particulars.
- xiii. Comply with Women Act as it is integral part of Code of Conduct

An employee shall not indulge in any of the following activities except with the prior permission of the Manager HR & Admin or respective HOD:

- i. Late night movement in office premises.
- ii. Enter the guard room or office premises after the office hours.
- iii. Late sitting for office related work.

1.15 Full, Fair and Accurate Disclosure of facts

PMBMC commitment shall be to provide full, fair, accurate and timely disclosure in the reports, documents and communications filed with the regulatory authorities. Although certain personnel are more directly involved in the preparation of such reports, documents and communications than others; nevertheless, PMBMC expects all of its employees to accept this responsibility.

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No unrecorded fund or assets of PMBMC shall be established or maintained for any reason. No false, artificial or misleading entries in the files and records of company shall be made for any reason. All reporting of information should be accurate, honest and timely and should be a fair representation of the facts.

Accordingly, all employees shall have an ethical responsibility to provide prompt, complete and accurate information in response to any inquiry related to preparation of PMBMC public disclosure documents and public communications. In addition, and in order to ensure accurate financial reporting, the personnel who participate in the maintenance and preparation of PMBMC books, records and accounts must ensure that the transactions and events recorded therein are done so in an accurate and complete manner in compliance with required accounting principles and PMBMC policies.

1.16 Anti- Bribery Policy

It is unacceptable for staff to solicit, accept, offer, promise or pay bribes of any sort.

If any such payments/bribes are offered or demanded, staff is required to report to their immediate seniors/ Department Head/ Company Secretary for appropriate action.

1.17 Anti-Corruption Policy

PMBMC is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. PMBMC has zero-tolerance for bribery and corrupt activities and after due considerations contract of the employee shall be terminated with immediate effect on account of corruption charges/corrupt practices. We are committed to act professionally, fairly and with integrity in all business dealings and relationships, wherever we operate.

Compliance with anti-bribery and anti-corruption laws must be at the forefront of this commitment and understanding those laws and the ethical standards required of all of us is therefore essential. As part of this commitment, PMBMC will not tolerate any form of bribery or corruption. Our policies and procedures must be followed, even if doing so may, on occasion, result in losing business. Failing to follow these procedures can result in severe criminal and civil consequences for PMBMC and the individuals concerned, and would put our hard-earned reputation, as well as our long-term financial health, at risk.

1.18 Workplace Harassment

PMBMC is an equal opportunity employer and is committed to cultivate a diverse work environment where individual differences are appreciated and respected. It is PMBMC policy, through responsible management, to recruit, hire, train, and promote persons regardless of their cast, religion, color, sex and creed.

An employee shall maintain an environment that is free from harassment and in which all employees are equally respected. Workplace harassment shall include, but not be limited to sexual harassment, disparaging comments and insinuations based on gender, religion, race and ethnicity.

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All cases of harassment shall be dealt as per provisions of

- i. Protection Against Harassment of Women at the Workplace Act, 2010 (Act IV of 2010);
- ii. Punjab Protection Against Harassment of Women at the Workplace (Amendment) Act, 2012 (Act III of 2013); and
- iii. The Protection Against Harassment of Women at the Workplace Rules, 2013
- iv. Punjab Women Protection Authority Act, 2017

Furthermore, Anti-Harassment Committee is also constituted which consists of the following members:

1. **Chief Internal Auditor** (Convener)
2. **Company Secretary** (Member)
3. **Female employee of PMBMC** (Member)

Anti-Harassment Committee will further report their findings to Company's HR Committee constituted by the BOD of the Company for their recommendations (if any)

1.19 Weapons, Workplace Violence, Drugs, Alcohol and Gambling

PMBMC staff whether on duty or not, shall not possess or use weapons of any kind, ammunition; gunpowder, fireworks, explosives, and other dangerous articles and substances in PMBMC premises/Bazaars. Individuals employed as contract security guards may be given authorization to carry, keep and handle pistols, firearms and ammunition.

Specific classification of employees may be required to utilize dangerous articles or hazardous material to carry out their job requirements. Each department is responsible for monitoring the use of dangerous articles or hazardous materials in its areas.

1.20 Responding to Inquiries from the Press and Others

Only authorized spokespersons shall speak with the press as PMBMC representatives with prior approval from the CEO/COO. Requests for information about PMBMC from the media, the press, the financial community, or the public shall be referred to the Company Secretary.

1.21 Confidentiality

The confidential Information shall include all non-public information, correspondence, documents, papers, records, drawings, internal noting/drafting/communications and data etc.

The employees shall maintain the confidentiality of information entrusted to them or which comes to an employee's knowledge because of the position that the employee holds. An employee shall disclose confidential information if the employee is duly authorized by PMBMC or is legally mandated to do so. Prior to making a disclosure of any confidential information which is legally mandated, an employee shall be required to consult with the Company Secretary.

During the course of employment and after its termination for whatever reason employee shall not disclose to anyone (nor use for any purpose other than the business of company) any information relating to company or its employees which is not already available to the public, unless authorized to do so.

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Such information includes technical secrets, and confidential research work, HR related papers of any employees/ex-employees, technical processes, operating manuals, and other confidential financial or business information of company.

An employee shall not make or keep for personal use, copies of any confidential information. All confidential information shall be surrendered to PMBMC when a person ceases to be an employee. This responsibility continues in the case of ex-employees and PMBMC shall pursue all available legal remedies to prevent current and former employees from benefiting or misusing such confidential information. Breach of any type of confidentiality may lead to termination of the contract with immediate effect.

1.22 Dress Code

Dress Code for employees including internees of PMBMC shall be smart and casual giving true professional look. Following are the specific guidelines for dress codes of males and females.

- i. Male Staff is required to wear dress shirts with dress pants along with dress shoes or Shalwar Qameez; and
- ii. Female staff should wear appropriate, smart, business style dress considering acceptable decent office wear colors and styles.

1.23 Accountability for Adherence to the Code

All Directors and employees including internees are responsible for adherence to the Principles set forth in this Code.

1.24 Internal Investigations

The Company will promptly investigate all alleged violations and potential violations of this Code, or of any related Company standard, policy or procedure. Any allegations will be treated confidentially, to the extent consistent with the Company's interests and its legal obligations.

No person covered by this Code may conduct his/her own investigation. Each of us is expected to cooperate in the investigation of an alleged violation of this Code. If the Company determines that corrective action is necessary to fix a problem and avoid the likelihood of its recurrence, the Company will promptly decide what steps to take and how to take, including legal proceedings when appropriate.

1.25 Disciplinary Action

Appropriate disciplinary action will be taken for violation of this Code, or any related Company standard, policy or procedure, including for:

- i. Authorization of or participation in violations;
- ii. Failure to report a violation or potential violation;
- iii. Refusal to cooperate in the investigation of an alleged violation; and
- Failure by a violator's supervisor(s) to detect and report a violation, if such failure reflects inadequate supervision or lack of oversight.

The competent authority to award major/minor punishment(s) will be CEO/COO except Corporate positions which will be referred to the HR Committee/BOD by the CEO/COO for final decision.

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1.26 Instances of Misconduct leading to Disciplinary Action

A list of minor and major offences is as follows. It is not intended to be exhaustive or to imply that there are no other cases of dishonesty and/or misconduct which warrant or may result in disciplinary action, up to and including termination from service.

Minor Offences

- i. Smoking in unauthorized areas of PMBMC Office.
- ii. Leaving department/place of work during working hours without permission.
- iii. Unauthorized operation of equipment.
- iv. Posting or removing notices from the notice board.
- v. Malingering, extending time of official breaks.
- vi. Sleeping at place of work during working hours.
- vii. Unauthorized soliciting of contributions on PMBMC premises.
- viii. Misuse of transport entitlement by extending it to those persons not covered by PMBMC travel policy.
- ix. Leaving the job without permission to conduct personal affairs at or outside work without authorization

- x. Tardiness in performing work or negligence of duties
- xi. Failing to give a superior sufficient time to arrange a replacement when unable to attend work as scheduled.
- xii. Failure to show a serious attitude or lack of diligence in carrying out work.
- xiii. Using profane, obscene, vile or abusive language while on duty.
- xiv. Inefficient, dilatory, careless, or wasteful working.
- xv. Distributing printed matter on PMBMC premises without permission from relevant authority.
- xvi. Other instances of a similar nature as those mentioned above.

Major Offences

- i. Willful insubordination or disobedience, whether alone or in combination with others, to any lawful and reasonable order of a superior.
- ii. Misbehaving with any Employee / Stall Holder /Customer of PMBMC.
- iii. Theft, fraud, or dishonesty in connection with the employer's business or property or any other offence of moral or criminal nature.
- iv. Willful damage to or loss of employer's goods or property.
- v. Taking or giving bribes or any illegal gratification.
- vi. Habitual absenteeism or taking leaves without prior approval from concerned authority.
- vii. Being absent for more than 3 days without prior approval from concerned authority
- viii. Habitual breach of any law applicable to the smooth functioning of PMBMC.
- ix. Removal of PMBMC records or release of confidential information / data / records to third parties.

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- x. Riotous or disorderly behavior during working hours or any act subversive of discipline.
- xi. Involved in political or any other activities against the law of country
- xii. Approach national or foreign mission/donor with whom PMBMC is in business unless otherwise authorized.
- xiii. Frequent repetition of any act or omission referred to under minor offence.
- xiv. Striking work or inciting others to strike in contravention of the provisions of any law, or rule having the force of law.
- xv. Negligence or carelessness, which results in personal harm or injury to other employees or damage and destruction of PMBMC property.
- xvi. Willfully causing delays / hinderance in company's operations.
- xvii. Unauthorized Possession of weapons / firearms / knives on the premises of PMBMC.
- xviii. Gambling on PMBMC property or violation of anti-corruption policy & conflict of interest policy.
- xix. Intentionally marking attendance/swiping identity card/punching timecard for another employee or having own card punched/swiped by someone else.
- xx. Disturbing the performance of other employees during work hours.
- xxi. Eating, drinking or smoking in times or places not permitted.
- xxii. Failing to meet specific performance targets outlined by PMBMC.
- xxiii. Accessing restricted areas, property or records, or removing PMBMC/other employee's property without proper authorization.

- xxiv. Committing any act on or off the job that will bring bad repute to the Organization.
- xxv. Violation of PMBMC policies or failing to perform an acceptable standard of work.
- xxvi. Misappropriation/Mishandling of Organization's property.
- xxvii. Unauthorized use of PMBMC letterheads or logos.
- xxviii. Making unauthorized commitments on behalf of PMBMC.
- xxix. Improper behavior such as drunkenness or sexual harassment.
- xxx. Use of Drugs (in any form) / Alcoholic Drinks at the premises of PMBMC.
- xxxi. Failure to pay back any loan/advance given to employee for official use
- xxxii. Making false or misleading statements which may damage the reputation of PMBMC.
- xxxiii. Other instances of a similar nature as those mentioned above.

1.27 Waivers and Amendments

The HR Committee/Board of Directors may waive or amend a provision of this Code subject to any applicable regulation/law.

1.28 Grievances Redress Committee

A committee shall be formed by the CEO for redress of grievances arising from unethical practices. The committee shall ensure that code of conduct is followed in its true spirit.

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1.29 Employee Certification Statement

The employee certifies the code of conduct using the following wording:

“I certify that I have read and understood the forgoing statement of Code of Conduct and will obey all other terms and conditions of HR Manual of the Company. I am aware that any deviation from or violation of the above mentioned Code of Conduct may result in disciplinary action against me which may lead to termination or dismissal from my employment contract and I further certify and confirm that I will fully obey and follow the HR Manual of the Company in all respects without any condition. Furthermore, I also certify that I understand that I have been appointed as the employee of the Model Bazaars and I may be transferred anywhere in Punjab for provision/rendering of services and administration can assign any task or assignment as per requirement. I agree to conduct all my duties in accordance with the standards outlined in this statement. I certify to the best of my knowledge, information and belief that I have not been engaged in any behavior which is unacceptable under this statement.

Name	CNIC No.
Designation	Signature and Thumb Impression