**Code of Business Conduct**

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**Policy brief & purpose**

The reputation of “Steg Laboratories (Pvt.) Ltd.” as a fair, reputable, and honest organization can only be maintained if all of its employees, executives, and partners adhere to high ethical standards in conducting the Company’s business. The Company has adopted standards to promote honest and ethical business conduct, and to reasonably deter wrongdoing and inappropriate or illegal acts.

Our Code of Business Conduct refers to the expectations that the company has from its employees and partners / suppliers regarding their behavior towards their colleagues, business partners, community and overall organization.

Compliance with the company’s code of conduct is essential for the avoidance of giving or taking offence, participating in serious disputes and disrupting the workplace. Observance with the code is also required to project a truthful image of a well-organized, respectful and collaborative environment and business relationship.

**Scope**

This code of business conduct applies to all prospective or current employees of the company hired directly or through third party, business partners, and suppliers. It applies to everyone working for the Company worldwide regardless of location, role or level of seniority. This includes all Employees, Managers, Operating Committee Members and Directors of the Company. We expect temporary and contract employees, consultants, agents and any other third party who acts in the Company’s name to act in accordance with the principles of the Code. Every subsidiary and joint venture which the Company controls must adopt and comply with the Code. Where we participate in but do not control a joint venture relationship, we will encourage our partners to meet the requirements of the Code in both the joint venture and their own operations.

**Responsibilities**

**Management:** is responsible to formulate, amend/ update the code of business conduct in accordance with the change in applicable laws and statutory regulations announced by regulatory authorities.

**Company employees:** are responsible for observance of every clause of this code of business conduct. Managers / Executives & Department / Section Incharges are responsible to provide awareness to their respective staff for effective implementation of this code. Departmental Heads are responsible to communicate this code to business partners / suppliers / service providers while entering in a business contract

**Business Partners / Suppliers / Service Providers:** are responsible for observance this code while having a business relationship with the Company. They are also held responsible for implementation of relevant clauses at their own business facilities for business continuity.

**Visitors:** are responsible for observance this code while in the Company.

**Compliance with Law**

All employees of the Company and its’ business partners, suppliers and service providers are obliged to protect the legality of the company by complying with **legal laws of the land**. These laws refer to all operational, employment, environmental, safety and fair dealing dictations of the local and international law as well as the company policy for corporate social responsibility. Detailed elements are as under:

* + Formulating a code or policy of business principles which includes applicable business integrity controls e.g. anti bribery, export controls, sanctions, antitrust, data privacy, money laundering, gifts, hospitality, conflict of interest, product quality & safety and reporting of concerns.
  + Provision of training to employees at least annually on applicable elements of the facility code or policy of business principles
  + Validating workers understanding of the compliance requirements, applicable to them.
  + Communicating policies and procedures to workers through method and languages they can understand
  + of implementation, communication, evaluation and enforcement of facility’s code or policy of business principles
  + Risk assessments should be conducted to evaluate policy and procedure effectiveness
  + Developing a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks
  + Code of business conduct should reflects the same requirements to be implemented by its suppliers and this is communicated to those suppliers

**Product Quality**

Our customers choose us because we provide a consistently superior product and service. Ensuring that our products are of the highest quality is critical to our success. We must each be aware of and follow Company policies and procedures that protect the quality of our products. In addition, we expect our suppliers to ensure the quality and safety of the products and services they provide to us. For this reason, we choose suppliers who share our values and who deliver superior products and services. It shall be ensured through:

* + Developing procedures for notifying customers if quality, safety, code breaches or misconduct occur either in our own business or of our suppliers if it has an adverse impact
  + Developing procedures that how to handle confidential information so that it is stored with limited access rights on a need to know basis **(see confidentiality and protection of sensitive information)**

**Antitrust**

It is Steg’s policy to compete fairly and vigorously everywhere we do business. All our employees must comply with antitrust and competition laws throughout the world. All product and service development, manufacturing and sales efforts must conform to the highest ethical standards. Antitrust laws prohibit agreements or understandings among actual or potential competitors to fix or control prices, fix bids, or boycott specified suppliers or customers, or limit the production and sales of product lines. Other laws prohibit controlling the resale pricing of distributors and dealers, disparaging a competitor, misrepresenting our own products or services, stealing trade secrets or offering or paying bribes or kickbacks. Antitrust laws are vigorously enforced. Failure to comply with antitrust or competition laws could result in heavy fines and/or imprisonment.

**Conflict of Interest**

All employees are expected to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties or be damaging to the company. Any situation voluntary or involuntary that might be perceived as conflict of interest must be reported to the appropriate manager.

Employees can find themselves in situations where there is a risk that their personal interests will conflict with those of their employer. However, any actual or apparent conflict of interest may create problems and harm the reputation of the Company. “Personal interests” should be taken in a broad sense, covering not only the interests of the employee him / herself but also those of his/her close associates (whether people or companies). To prevent conflicts of interest, employees must safeguard against situations in which the objectivity of their business decisions may be impaired, and in particular:

Employees must inform the management / their operational head in advance of any investment in a competitor, supplier or customer, whether by acquiring an equity interest (other than by buying shares in a listed company) or a business activity. While employees are entitled to participate in not-for-profit activities in a personal capacity, they should ensure that this does not create a conflict of interest with the Company. We respect the political opinions and personal commitments of our employees, but any expression of such beliefs or commitments must remain personal (i.e. outside working hours and at the employee’s own expense).

Consequently, employees are formally prohibited from committing the Company to any political activism or demonstration by mentioning the name of Steg Laboratories or by using its headed notepaper, funds or resources. Similarly, Steg Laboratories premises may not be used for personal political activities.

Employees may have someone close to them whose personal interests are linked to the Company’s activities. In situations where such a link is identified and the objectivity of decisions made by the Company might be challenged, the employee must inform his/her superior of the link before any decision is taken and play no part in the decision-making process.

Where required clarification must be promptly requested from the senior management.

**Bribery and Corruption**

We shall assess the risks of bribery in our business partners, including intermediaries, brokers and agents, prior to entering commercial relationships. Internal control shall be strengthened more in financial transactions and their records. Internal audits to be conducted periodically. Employees cannot be a part of or associated with any activity that can be considered corruption. Employees are actively discouraged and strictly prohibited to accept briberies in any form for any purpose. We expect and require all our employees not to accept or offer, directly or indirectly, during the course of their employment:

* + Money;
  + Gifts;
  + Services;
  + any other benefit

to or from persons / organizations, or facilitated by them, with a view to inducing them to do or not do something within the scope of their job or position. Such behavior (active / passive) may invoke legal actions that will be damaging for both parties responsible.

In case an employee feels that he or she somehow has been offered briberies, they must report the event to the senior management as appropriate and seek advice on how to respond to the situation.

Employees are actively discouraged from accepting such gifts or services from vendors, suppliers, customers, potential employees, potential vendors or suppliers, or any other individual or organization, under normal circumstances or particularly when accepting gift appears to cause conflict of interest or our employees need to examine the ethics of acceptance. However, under reasonable circumstances, an executive may accept an official gift of such items which are of nominal value (up to 2,000 rupees maximum) and for office use. Such items may include promotional items generally given across the customer base. It may be appropriate to reciprocate it by giving gift of Steg Laboratories’s official give away items to the client. In case gift of higher value is offered or sent directly or indirectly or through courier then the matter should be promptly brought into the notice of senior management as appropriate and advise sought on a polite and professional way to decline and return the gift.

However, gifts or promotional giveaways such as mugs, t-shirts , pens, trade show bags and all other small value office decorative objectives (tchotchkes) that employees obtain, as members of the public, at events such as conferences, training events, seminars, and trade shows, that are offered equally to all members of the public attending the event can be accepted.

At times of the year when gift giving is traditional, it is required that no gift item or food gift is taken home by employees. Food gifts must be shared with and distributed to all staff directly or better through HR function.

As regards, meals, travels, hoteling, sport events and other such entertainments offered by vendors, suppliers, customers, potential employees, potential vendors, and suppliers, or any other individual or organization, it is, as a rule of thumb, advisable for the company employees not to be obliged. Nonetheless, when one on one lunch/dinner/tea invitation is received from any of the aforesaid parties then the employee themselves are the best judge to accept to decline the offer. In case the offer is deemed acceptable then senior management as appropriate must be taken on loop prior to seeing the client for the purpose. Employee is then supposed to reciprocate it on the first available opportunity. However, meals not specially arranged for the company employees but rather offered during the course of events organized equally well for all customers by the aforesaid parties can be accepted. Besides, moderately priced entertainment is provided as part of a “working” meeting or session to benefit and advance positive working relationships and company interests. These activities are expected to be reciprocated by our company in turn.

Employees are required to professionally inform vendors, potential vendors and others of this company’s policy on gifts and giveaways. Under the circumstances it may be required to request that vendors and others to respect our company policy and do not purchase and deliver any gift for our employees, a department, an office or the company.

**Communication**

All employees must be open for communication with their colleagues, supervisors or subordinates. It is important that any employee in the workplace can refer to another so that their work as well as work conditions can be as productive and problem-free as possible.

**Using social media**

Steg Laboratories attaches great importance to protecting its image and reputation. This includes the use of web-based social media by its employees, professionally or privately. This applies to all social networking sites (e.g. Facebook, LinkedIn, Twitter), to blogs, to photo/video sharing sites (e.g. YouTube, Flickr), and to wikis and forums.

Only designated employees are authorized to speak on behalf of the Company about our company or its products. Any use of social media by any employee, including any private use, could be attributed to our company and negatively impact its image and reputation.

Consequently, any employee who participates in social media must do so in a responsible manner. Employees must also remember that any information posted on the internet may be accessed by anyone from anywhere, and could remain accessible for an unlimited time; they could be personally liable for content that they post on the internet.

**Confidentiality and Protection of Sensitive Information**

Any information that is not in the public domain must be protected, even if there is no formal obligation of confidentiality. This applies equally to information about the Company, about its employees, and about third parties.

The Company draws its competitive advantage primarily from sensitive scientific, technical and commercial information. This information is of great value to our business, and disclosing it inappropriately or accidentally can not only impair the Company’s competitiveness but also result in malicious acts or unfair competition (counterfeiting, industrial espionage). Risks relating to the pirating of data files, virus intrusions and similar practices are a constant threat and affect all of our employees. All necessary measures must therefore be taken to protect such information (on whatever medium it is stored) and to keep it in a safe place.

In addition, disclosure of such information may breach confidentiality undertakings given by the Company to third parties (such as the owner of a product licensed to us, or a partner in a joint venture with us), or may be a source of insider dealing. Sensitive information must therefore be protected. Any situation in which it is proposed to disclose such information outside the Company, even where there is an established course of dealings with a third party, must be examined with care.

Examples of inside information include information about:

* financial results;
* proposed acquisitions or divestments;
* issuance of marketing approval for a new product;
* losing or gaining a major contract;
* ongoing litigation.

**Disciplinary Actions**

Failure to comply with any part of the Code of Conduct’s guidelines will result in appropriate disciplinary action. The party responsible for non-compliance will be subject to repercussions that vary in regards to the severity of the violation. Possible consequences will include reprimand, detraction of benefits for a definite or indefinite time, demotion, suspension or termination for more serious offences. Legal action may have to be pursued in cases of corruption, theft, embezzlement or other unlawful behavior.

**Working at Steg Laboratories (HR Policy)**

We are an equal opportunity employer and we discourage all sorts of discrimination in hiring, promotion, transfer, career progression, discipline and terminations etc. Each function has proper documentation and records such as personal files, training, promotion, transfer, feedback and disciplinary actions are recorded and kept in designated locations. Child Labour/ Forced labour is strictly prohibited. Age verification is done through CNIC / Birth Ccertificates/ Educational Certificates. Photocopies of age prrofs are retained in employees’ personal files. We respect our team, and committed to inculcate a respectful culture in our company. To mean it, Company has developed its HR Policy and procedure to ensure no discrimination in all HR functions. HR Staff has requisite experience to perform HR functions in accordance with the legal guidelines. Every employee of the Company chooses employment freely. We do not allow forced labour at our facility and our business relations with our supplier/customers and vendors also depends on compliance with this clause. Our employees receive an appointment letter / employment contract in a language that is easily understandable to the employees, signed by the employee and the Manager HR & Admin (on behalf of the Company). Any change(s) in employment terms and conditions shall be documented and communicated to the respective employee(s) accordingly. This document is standardized, and states maximum possible terms and conditions of employment. Though all the employment clauses are not possibly entertained in this document, rest of the issues shall be addressed according to the employment laws of the land. If it becomes necessary to get employees from outside agencies, agencies are clearly communicated to comply with all applicable employment laws of the land. Such contracts shall have the relevant clauses and manager HR & Admin shall ensure before signing such contract. Agencies are not allowed to charge workers fees for brokering employment opportunities at the Company. The probationary period for workers does not exceed terms permitted by local legal requirements; Workers are not repeatedly hired on temporary contracts as a means for the employer to avoid paying same terms and benefits as for permanent workers; workers are not dismissed and rehired as a means for the employer to avoid paying same terms and benefits as for permanent workers. Though we prefer to strengthen our Country’s economy by creating and providing employment opportunities for our own nationals, still, if there is a need to hire expatriates, it shall be ensured by the Head of HR that they shall not pay fees or employment costs to agents in their own or host country for the opportunity to be employed by the Company. For workers, we have a pre-induction training manual in Urdu language which covers almost every aspect from joining to leaving the employment and a CoC for executives in English language to provide necessary awareness.

**Equal Opportunity and Respect in the Workplace**

All employees are bound by the equal opportunity policy of the company. They are obliged to behave in a respectful manner towards their colleagues and strictly refrain from any kind of discriminatory behavior, harassment or victimization. As a basic principle, we do not allow any form of discrimination based on caste national origin, ethnicity, religion, age, disability, gender, material status, sexual orientation, union membership, political affiliation, health, disability or pregnancy. Women are not asked for pregnancy test to seek employment in the Company. Maternity benefits are provided to respective female employees according to the law. Pregnant Female employees are assigned duties which are not harmful to their health. Managers, Supervisors and Section Incharges are provided necessary guidance handling such issues. There is no retention by the Company or its employment agency of original identification papers and / or passports. We do not impose unreasonable notice requirements, or financial penalties, beyond legally allowed limits for workers when they leave the employment of the Company. Final Settlements are made promptly, without unreasonable delay when employee leaves the employment. Workers have freedom of movement and are not confined to the facility’s premises. Overtime is performed on voluntary basis. Workers who refuse overtime are not penalized (e.g. there are no threats if pay cuts, dismissal, demotion etc.). Workers are not monitored when they take toilet / rest breaks. Worker are not asked for deposits when they commence employment at the Company.

This applies to all aspects of the workplace from the recruitment and evaluation processes to interpersonal relations between employees. The company has no tolerance for this kind of behavior and disciplinary actions will be taken when appropriate.

**Fair Wages**

As a principle, we are committed to comply with minimum wage and overtime compensation requirements prescribed by the law. It applies for all categories i.e. hired directly / indirectly, permanent or temporary workers etc. Workers are paid monthly remuneration before 7th day of each month as per the law. Pay slips are provided to every employee providing necessary details of their allowances and deductions. We are committed to comply with other legal obligation e.g. Social Security, EOBI, Group Life Insurance, Bonus, WPPF, Annual Leaves etc. Pays are not subject to any deductions on account of disciplinary actions in any case.

**Working Hours, Overtime and Rest and Holidays**

We are committed to comply with working hours, leaves and rest day guidelines provided in the Law. Normal working hours do not exceed eight hours a day. Employees are provided with 7th day as weekly rest. All public holidays are treated as paid days. Rest breaks are provided as per the law. Overtime work is not exceeded 12 hours a week or 48 hours a month except urgent business needs where situation is unavoidable. Risk assessments are conducted to evaluate the arrangements for workers doing overtime e.g. driving after a long shift and include implementation of controls to reduce identified risk

**Freedom of association**

We do not restrict our employees on Freedom of Association and the Right to Collective Bargaining. As a parallel mean, Worker Management Committee meets monthly on the prescribed agenda and related issues prescribed in the Law. Minutes are recorded for necessary actions. Managers, supervisors and guards are trained to respect each workers’ right to associate freely. Worker representatives are democratically elected in a free and fair electoral process which is conducted on a regular 8basis. Workers are not forced to talk to facility management about personal or sensitive matters. Workers are not penalized (or discriminated) for seeking to join or create; being a member of; or being involved with a union or worker committee. Company does not refuse recognized trade unions, unless refusal is allowable by law. Company does not interfere with union decision making or the election / appointment of worker representatives. Company does not obstruct recruitment activities or does not restrict reasonable access to unions for member recruitment. Workers know and understand their rights, feel confident to exercise them and that no other worker or manager will impede them in the enjoyment of that right. Worker representatives are given time off to meet and address issues. Issues arising from councils or committees are considered for necessary actions.

**Occupational Safety and Health (OSH)**

We are committed to comply with legal OSHE requirements and to promote safe and healthy work environment to our employees. We believe in corporate social responsibility and assess the impact of our business on community and environment. We have policies and procedure in this regards and committed to its implementation across the board. The Company shall implement OSH systems and shall strive to obtain relevant certifications and required permits / licenses from concerned regulatory authorities. Communicating the relevant information to all stakeholders e.g. employees, business partners, suppliers, service providers, and visitors shall be essential whenever and wherever required. Safety trainings shall be provided to employees and awareness shall also be provided to persons intends to enter in our facility. PPEs shall be provided in sufficient quantity. Pre-induction training for new joiners must have necessary guidelines for safety, health and environment aspects. Persons other than employees, intends to enter in the facility shall be guided to the necessary safety elements at main gate by the security officer / HR staff. Proper risk assessments to be done and control measures shall be taken appropriately. HSE Committee shall be formed and committee shall meet periodically for HSE concerns.

**Fire & Emergency evacuation**

Specific to the fire safety, regulatory inspections shall be conducted or requested to the concerned authorities for inspections e.g. Civil Defence, Chief Electrical Inspector for electrical wiring, Chief Boiler Inspector for boiler. fire extinguishing equipments shall be installed / provided in sufficient quantity having operating instructions stickers / posters, first aid boxes shall be made available to provide immediate aid and if required affected personnel shall be shifted to the nearest hospital in case. Risk assessments shall be conducted to evaluate fire safety issues, including implementation of controls to reduce identified risks. Fire alarm system shall be installed and tested monthly. In the facility, fire exits are sufficient in number to allow all workers to exit quickly in an emergency. Fire exits shall not be restricted and can be opened immediately in an emergency. Fire escape routes and exit doors are clearly and adequately marked and signposted for all to see easily and understand. Fire exits open in the direction of egress and are maintained appropriately. Aisles and exits shall not be kept blocked. Fire fighting equipment shall be accessible, and fit for purpose in the area present. Fire fighting equipment shall be inspected monthly and serviced if it deems necessary. Emergency Lights shall be installed in sufficient quantity covering all areas. Employees shall be provided trainings on Emergency Evacuation, Fire Fighting and Basic First Aid. Emergency Exit Signs shall be posted in understandable language / pictorials. Evacuation procedure shall be tested through regular drills for all employees of all shifts, bi-annually and records shall be kept in the Office of Manager HR & Admin. Emergency evacuation procedures shall have the part of evacuation of disabled persons. Assembly points shall be clearly marked and identifiable for employees and visitors.

**Facility and worker safety**

Following measures shall be taken to ensure facility and workers’ safety:

Electrical wiring shall be adequately encased and secured, electrical department is responsible to ensure there is no loose or naked or damaged electrical wiring across the facility to avoid accident. Electrical work to be performed in a safe way and required PPEs shall be used. Where appropriate, procedures and equipment to prevent explosions shall observed and maintained. Facility premises are structurally shall be ensured safe. Building Stability Certificates shall be obtained from authorized architect engineer. Facility lighting shall be maintained up to the required levels in all areas. Heating, Ventilation and Air Conditioning (HVAC) systems shall be be maintained where required. Potable drinking water shall remain accessible to all personnel entering in to the facility. Water supply for the site shall be tested for safety on a regular basis, at least monthly, and records shall be maintained. Provision of washrooms / toilets shall be sufficient for both genders and shall be separated, clearly marked and cleaned appropriately with respect to the sanitary requirements. Hand washing facilities with soap and running water shall remain provided in all toilets adequately. Risk assessments shall be conducted for all job roles, including implementation of controls to reduce identified risks. Workers' conditions shall be assessed on a regular basis to understand conditions that may require PPE (e.g. ear protection due to noise levels). Suitable and maintained Personal Protective Equipment is issued to workers (free of charge). Workers shall be trained on the purpose of Personal Protective Equipment and their appropriate use. Environmental monitoring shall be done periodically. All accidents and incidents must be recorded appropriately and a root cause analysis shall be done for remedial / corrective and preventive measures. Appropriate medical examinations shall be done for workers (e.g. for testing of hearing loss in high noise level working environments). A medical room or utility shall be provided for workers. A trained first aid provider preferably a doctor / nurse shall be appointed. First Aid kits shall remain available in sufficient quantity, appropriately stocked and maintained, and contain materials that are not out of date. Appropriate number of employees shall be trained on First Aid and their Snaps along with names shall be posted in respective areas.

HSE Committee shall prepare “safe operating procedures” for hazardous tasks and provide trainings to relevant workers. Machine maintenance history shall be maintained. Housekeeping shall be done regularly to ensure safe and tidy workplace. All lifting equipment shall have operating instructions along with loading capacity; Operators shall be authorized to ensure safe handling of loads - as appropriate and determined by risk assessment of the jobs. Training shall be given to all workers on general Health & Safety to ensure Safe Working Practices. Risk assessments and procedures shall be maintained for pregnant female workers and provision made to ensure safe working conditions. All safety related records shall be maintained properly.

Hazardous chemicals / materials shall be controlled, stored, used and disposed of according to local legal requirements e.g. secondary containment and special storing arrangements for flammable materials are in place where required. Hazardous chemicals / materials risks shall be assessed and appropriate training must be given to workers on their treatment and safe use / handling. All hazardous chemicals / materials must be labeled in all necessary languages for workers not be to be put at risk. Where Hazardous chemicals / materials are handled there are appropriate spillage / cleaning kits and they are in date and in good order to be used. Body and eyewash facilities shall be provided in hazardous environments and they are in date and in good order to be used. Material Safety Data Sheets shall be maintained and readily available in all languages for those who need to use them. Staff mess shall be kept in a hygienic condition. If food is required to from caterer, they shall be asked for sanitation certificates issued by the regulatory authority.

**Safety at Dormitory**

Company provides bachelor accommodation only to the security staff located at main gate. Family or children are not allowed to enter in the factory premises. Nobody is allowed to stay within the production or storage areas in a sense of resident. Cocking, Drinking facilities are provided in dormitory. Appliances are fit and operational. Dormitory shall be kept clean and safe in all aspect and shall not be used for other purpose including storage or otherwise.

**Grievances / Complaints / suggestions**

Company has proper procedure for grievance management, complaints / suggestions. Employees can freely raise their concern / complaint to the Head of HR & Admin who work as employee advocate as well. Any grievance / complaint / suggestion shall be considered if found within the legal framework and appropriate. A register of grievance / complaint / suggestion shall be made where actions taken must be recorded against received grievance / complaint / suggestion. grievance / complaint / suggestion Boxes shall be provided for both genders and will be opened weekly by the Head of HR & Admin. Received grievance / complaint / suggestion along with actions taken shall be posted on Company notice board. No employee is subject to have a disciplinary action or discrimination against filling a grievance / complaint / suggestion.

**Land Rights of Communities**

Company is fully committed to comply with laws of the land and corporate social responsibility. We respect communities, minorities, and women specifically on the principles of Free, Prior and Inform Consent (FPIC). We comply with all legal and ethical standards while acquiring the lands for our business use. Prior to acquiring a land, proper verification from Government departments is being done for identification of right owners. We strongly prohibit illegal land acquisition / use in any case.

**Sustainability and Environmental Impact**

The Company recognizes its responsibility for the protection of human health, the environment and natural resources. Our highest priority is protecting the safety and health of our employees, consumers, customers and members of the communities where we do business. We always operate our facilities and conduct our operations in compliance with all applicable environmental laws, regulations and permits. Where none exist, we set ourselves appropriately high standards. Throughout our operations, we consider the environmental implications of the business decision that we make. In doing so, we seek to support environmental sustainability and biodiversity. We are committed to re-use, recycling and recovery programs for wastes and to disposing of unrecoverable wastes safely and with minimal impact, and we apply strict conservation methods to our use of resources, including water, packaging, energy and other raw materials.

The HSE Committee shall have the responsibility to assess environmental aspects, monitor and measure environmental impact and recommend control measures. Committee shall also be responsible to implement the Company policy for continuous improvement on protection and preservation of the environment with a focus on reducing resource consumption, recycling, and reducing green house gas emissions as well as innovation to reduce environmental impact. The HSE Committee shall advise the system to monitor natural resources and energy consumption and discharge of effluents / disposal of waste in respect of quality and local impact. The Committee has a responsibility to set appropriate reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green house gas emissions. The Committee shall have the agenda to address any sort of deforestation (if happens), and the plantation to address the impact at zero level. The committee shall have the responsibility to audit Company’s business partners / vendors / suppliers and Service Providers before entering in to a business contract.

**Duty to inform / disclose**

Any kind of activity which falls in misconduct / policy breaching shall be reported to the Head of HR & Admin through email ([hr@steglab.com](mailto:hr@steglab.com)) or Suggestion / complaints boxes provided in the factory or by telephone (0333-4612850) whichever is convenient. Suppliers / service providers / visitors and employees are encouraged to inform such occurrence in good faith of the Company and our relationship. Company has a detailed disciplinary actions procedure to address such issues.

If an employee or potential employee has a relationship with any of the Company vendor(s), supplier(s), competitor(s), or with any government / regulatory body, or with a current / potential employee which may result in conflict of interest, it is considered his duty to disclose and report such relation to the senior management or to Human Resource department immediately.

If an employee believes in good faith that a rule or one of the principles laid down in this Code of Ethics has been or is about to be violated, he or she must inform his or her superior or Human Resource department or senior management of his or her concerns regarding possible illegal practices or ethical violations, while respecting the rules applicable in the country in which he or she lives or carries out his or her work.

Any employee acting in good faith who has any doubt or suspicion relating to potential illegal or unethical practices in finance, accounting, internal control, in the respect of free competition or the fight against corruption can make use of the Alert Procedure.

In such cases, an employee may, contact the Head of HR & Admin based at plant 20 KM Off Lahore Sheikhupura Road,– Pakistan verbally and/or in written through dedicated and secured email i.e. hr@steglab.com

Employees will not be disciplined or discriminated against provided that they act in good faith, and with no malicious intent, even if the facts reported prove to be inaccurate or no further action is taken. Head of HR & Admin will investigate the facts reported, with support from other functions if necessary.

Individuals whose conduct is reported will be informed as soon as possible, subject to any preliminary investigations that may need to be conducted. They are entitled to the rectification and/or erasure of any data about them that are inaccurate, incomplete, ambiguous or out of date.

Any report that reveals fraud, a significant compliance breach or a significant internal control weakness will be addressed by corrective action and/or disciplinary action and/or legal proceedings.

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