

CODE OF CONDUCT

Introduction

The Code of Conduct covers a wide range of business practices and procedures. It does not cover every issue that may arise, but sets out basic principles for employees to use along with other Unity Foods Limited policies and their own best judgment. Circumstances may occur when employees are required to follow more stringent standards as imposed by local law.

If a law or regulation conflicts with a policy in this Code, all employees must comply with the law. If employees have any questions about these conflicts, they should consult their manager/supervisor about how to handle the situation. If they are in a situation that they believe may violate or lead to a violation of this Code, they must follow the guidelines described in this Code.

When any employee faced with a potential conflict between their ethical standards and the conduct of the Company, it is their responsibility to resolve the conflict by referring to the Compliance Procedures set by the company policies. When in doubt, contact Human Resource Department.

All Unity Foods Limited employees must conduct themselves appropriately and avoid even the appearance of improper behaviour. The Code should be provided to, and followed by, agents and representatives, including consultants, vendors, freelancers and contractors who work on behalf of Unity Foods Limited.

Those who violate the standards in this Code will be subject to disciplinary action up to and including termination of employment.

Objective

The objective of this code of conduct is to set standard parameters of values, attitude, norms and behavior while working on the platform of Unity Foods Limited.

To provide public and employee relations counsel and strategic communications services that enables our employees to build strong relationships and to influence attitudes and behaviors.

To build long-term, rewarding relationship and partnerships that adds value to our clients and our people.

Dress Code

- a. All employees are expected to be professionally and neatly attired during office hours. Due consideration shall be given to culturally acceptable norms of dress and hygiene by both male and female employees.
- b. The general acceptable office attire is smart casual.
- c. Both male and female employees are advised not to wear shorts, tee-shirts, figure hugging, see-through, un-ironed and untidy clothes, excessive jewelry or anything else which constitutes generally unacceptable office attire.

Protecting Company's Resources

- a. All employees are responsible for safeguarding the Company's and the Client Companies tangible and intangible assets including business plans, customer information, property and services.
- b. Copying, selling, using and distributing information, software and other forms of intellectual property in violation of license agreements are prohibited.
- c. The use of office email, telephone, fax, computers and other communication tools are primarily for business purposes. Personal communication, if necessary, must be kept to a minimum.
- d. Stationery including letterheads is to be strictly used for business purposes only and must not be used for personal correspondence or as a means of conducting personal business.
- e. The Company expects all its employees to consciously help conserve scarce resources such as electricity and water.

Discrimination and Harassment

Unity Foods Limited encourages a work environment where employee differences are valued and respected. We promote equality of gender, race and religion and prohibit gender bias or any other kind of discrimination, harassment or intimidation whether committed by or against a supervisor, co-worker, customer, vendor or visitor.

Fraud, Forgery, Theft or any Illegal Activity

- a. Employees shall be alert and vigilant with respect to frauds, forgery, thefts, or illegal activity committed within the office.
 - b. Making fake claims of expenses, producing false supplier quotations or issuing falsified statements all constitute illegal acts.
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Copyright

- a. Employees are not authorized to make copies of copyrighted materials / Unity Foods Limited's proprietary information such as documents, policies, manuals, instructions, software etc.
- b. Any work that an employee undertakes for Unity Foods Limited is the sole property of the Company and shall be treated as copyright.
- c. The Employee acknowledges that Unity Foods Limited shall have sole and exclusive copyright over all literary, art and creative works developed or created by the Employee during the term of the Employment.
- d. The Employee shall further, wherever possible, promptly notify HR at Unity Foods Limited of the creation of such and all other literary, art, creative works and assist the Company in respect of the enforcement of copyrights relating to all such literary works, if required to do so by Unity Foods Limited.
- e. Likewise, concepts, ideas, suggestions and other intellectual inputs received or contributed in the course of the employment are proprietary to Unity Foods Limited and shall remain the property of Unity Foods Limited even after an employee leaves the Company.

Participation in Political Organizations

- a. No employee shall canvass, or otherwise interfere or use his/her influence in connection with, or become part of, the candidature in any election process for a legislative body, whether in Pakistan or elsewhere without obtaining specific prior permission from the CEO. Nothing herein shall prejudice the voting rights of an employee who is qualified to vote, provided that such employee shall give no indication of the manner in which they propose to vote or have voted.
- b. If any question arises whether any movement or activity falls within the scope of this rule, the decision of the CEO thereon shall be final.

Outside Pressure

No employee shall bring or attempt to bring political or other outside pressure / influence directly or indirectly to bear on any staff member or indulge in negative pamphleteering, contribute articles or write letters to newspapers, anonymously or in his / her own name, with an intent to induce the authority / superior officers to act in a manner inconsistent with rules with respect to any matter or condition of his / her employment.

Gifts and Presents

- a. Employees are not permitted to accept gifts, entertainment or other favours from suppliers, customers, subordinate employees or person(s) likely to have dealing with the Company and candidates for employment in the Company.
- b. Where, for some reason it is not possible to refuse gifts or entertainment, the acceptance of such should be immediately brought to the notice of the Functional Head and/or the Head of HR for advice on how to handle the situation.
- c. Promotional giveaway items bearing the logo of the company presenting the gift may be accepted e.g. calendar, keychain.

Confidentiality

- *Confidentiality of Client Information:* Unity Foods Limited has a strict duty of confidentiality to all of its Client Companies. All employees must take the greatest care to respect confidentiality of client information. No client information must be disclosed to any third party.
 - *Confidential Business Information* made available to the employee during the employment must be held in the strictest confidence and must be deemed by the employee to be proprietary to Unity Foods Limited and is not to be disclosed or divulged by the employee, whether directly or indirectly, in any form to any unauthorized person or persons within Unity Foods Limited or outside of Unity Foods Limited, during or after the employment. The employee's obligations on the disclosure and divulgence of Confidential Business Information are also subject to all statutory regulations applicable in Pakistan and to the Company's internal code of conduct.
 - The employee *must not remove nor allow others to remove*, any documents or any items which belong to Unity Foods Limited or which contain any Confidential Business Information from the Company's premises at any time without proper advance authorization from the employee's supervisor.
 - The employee *must not copy, nor allow others to copy*, the contents of any documents, computer media or other tangible items which contain any Confidential Business Information which belong to Unity Foods Limited or its clients, without authorization from the employee's supervisor.
 - The employee *must return to the Unity Foods Limited on or before the end of employment date*, all documents whether in print or machine readable form or any tangible items which belong to the Company or its clients or which contain or refer to any Confidential Business Information related to Unity Foods Limited and its business or any of its clients or their business and which are in the possession, or under the control, of the employee.
 - The Employee hereby *indemnifies Unity Foods Limited for all damages* which may be suffered by the Company as a direct result of the employee's wrongful, neglectful, unauthorized or willful disclosure or divulgence of information and/or the failure to comply with the above
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provisions relating to confidentiality.

- Employees are not permitted to use the above information for their benefit and any breach of confidentiality will make the employee liable for immediate dismissal and/or legal action while in service with Unity Foods Limited. *The obligation to maintain confidentiality will continue to subsist even if the employee is no longer in service with Unity Foods Limited* on account of termination of services, by resignation, dismissal or otherwise. Unity Foods Limited shall have the right to take legal action against the ex-employee upon breach of this obligation to maintain confidentiality.

Conflict of Interest

- a. A conflict of interest may exist if an employee's outside activity or interest is, or may reasonably give the appearance of being, inconsistent with or opposed to the best interests Unity Foods Limited and/or its clients. Personal as well as official activities are governed by this concept.
- b. Employees must ensure that their personal interests do not conflict with the duties which are owed to Unity Foods Limited or which Unity Foods Limited owes to its Clients. This includes accepting any employment (whether part time, temporary or other), consultancy, directorship or partnership outside Unity Foods Limited.
- c. If employees are in doubt about whether a certain circumstance might create a conflict of interest please consult Head of HR for guidance before taking action.

Whistle blower Policy

- a. **General:** Code of Conduct ("Code") of Unity Foods Limited requires employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Unity Foods Limited, they must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.
 - b. **Reporting Responsibility:** It is the responsibility of all employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.
 - c. **What Constitutes Irregularities under this Policy:** Whistle blowing is specific and means a disclosure of information made by an employee where he/she reasonably believes that one of the following is happening or is likely to happen as a result of the actions of a co-employee:
 - A criminal offence
 - A failure to comply with legal obligation
 - A danger to the health and safety of an employee
 - A serious breach of Unity Foods Limited's internal policies, rules, regulations or business principles exposing the Company to any financial, operational, market or reputational risk
 - Any unethical conduct
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- Questionable/ unusual accounting practices
 - A deliberate concealment of information tending to show any of the above
- d. **No Retaliation:** No employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.
- e. **Reporting Violations:** The Code suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if an employee is not comfortable speaking with immediate supervisor or is not satisfied with supervisor's response, he/she is encouraged to speak with Manager HR. The Manager HR shall evaluate each case and where deemed necessary report it to CEO for appropriate action and/or further escalation.
- f. **Content of Reports:** Sufficient information must be included in a complaint, report or concern to warrant investigation. This includes (1) description of the matter with all known facts, dates, names and location (2) an indication of the reason why the matter is of concern (3) an indication of whether the matter is on-going, happened previously or is in planning (4) an indication of how the reporting employee became aware of it (5) names of witnesses if any (6) supporting documents or evidence if any (7) name of anyone else in the Company the employee may have already spoken to about the matter (8) if matter of financial nature, then indication of approximate amounts involved.
- g. **Investigation of a Report:** The Manager HR shall be responsible for assigning the investigating officer based on the seriousness of the complaint. For more serious cases involving financial loss or potential financial loss, the Head of Finance and Operation shall be assigned the investigation responsibility. The investigating officer shall be responsible for not only investigating but also resolving reported complaints and allegations concerning violations of the Code, criminal offences, frauds etc., and shall advise the Head of HR and CEO.
- h. **Acting in Good Faith:** Anyone filing a complaint concerning a violation or suspected violation of the Code or any other policy or matter must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.
- i. **Confidentiality:** Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.
- j. **Handling of Reported Violations:** The Manager HR shall notify the sender where identified and acknowledge receipt of the reported violation or suspected violation within a reasonable time period in line with other HR policy guidelines. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.
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Misuse of IT Resources

- Unity Foods Limited's IT Resources are provided to support Unity Foods Limited goals. This means that personal use of PC's, printers, the internet and other IT resources must be kept to the minimum to avoid placing an unacceptable burden on Company systems.
 - Suspected misuse of Unity Foods Limited's IT Resources is subject to investigation and may result in disciplinary action, including warnings or termination of employment.
 - Unity Foods Limited IT may monitor, change or terminate your access to any Unity Foods Limited IT Resource in order to prevent, stop or misuse.
 - Examples of misuse include, but are not limited to, any use expressly prohibited by Company policy such as making confidential company information available to unauthorized individuals. Viewing, or sending material that might be considered offensive or damage the company's reputation and surfing restricted sites (e.g contains sexual stuff).
 - Any employee that has any suspicions of IT resources misuse should contact the local IT staff immediately either by phone or through email.
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