

# Code of Conduct Policy

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## 1. Objective

The objective of this Code of Conduct is to establish clear guidelines that define the ethical / legal standards and acceptable behaviors that all employees and stakeholders of Gatronova are expected to comply with. It serves as a framework of guiding principles for employees in decision-making and interactions with stakeholders. Adherence to these principles is essential for maintaining trust, enhancing our reputation, and ensuring a positive impact on both the industry and the communities we serve.

## 2. Scope

The scope of this Code extends to all individuals associated with Gatronova, including employees, contractors, vendors, stakeholders, customers, and any other relevant parties. It applies to all company activities, whether conducted within the organization, in the marketplace, or within the community.

## 3. Ethical Conduct and Moral Standards

At Gatronova, we are committed to upholding high moral and ethical standards in all our business operations and day-to-day interaction with all stakeholders. Our goal is to achieve excellence and create value for all internal and external stakeholders. All stakeholders associated with Gatronova must adhere to these guidelines. Key principles include:

- a. Acting with honesty, transparency, and integrity in all business dealings.
- b. Complying with all applicable laws and regulations.
- c. Respecting human rights and ensuring fair treatment for all employees.
- d. Safeguarding company information and maintaining confidentiality.
- e. Avoiding actions that could harm Gatronova's reputation.
- f. Demonstrating accountability and responsibility in professional actions.
- g. Encouraging the reporting of unethical practices and fostering a culture of ethical behavior.
- h. Supporting sustainability and environmentally friendly business practices.

## 4. Conflict of Interest

A conflict of interest occurs when personal or financial interests interfere with an employee's ability to act in the organization's best interests. Employees must avoid situations that create conflict of interest with Gatronova's business.

Examples include, but are not limited to:

- a. Assisting or holding financial or non-financial interests in competitor companies.
- b. Engaging in activities or relationships that compromise professional judgement or company interests.
- c. Using confidential company information for personal gain or third-party benefit.
- d. Holding external employment or consultancy roles while in employment at Gatronova is not allowed, unless approved by the management.
- e. Participating in decision-making processes where a personal relationship or financial interest could impair impartiality.
- f. Influencing or making business decisions that benefit family members or close friends.
- g. Failing to disclose relationships that could impact hiring, promotions, or workplace decisions.
- h. Involvement inside businesses is not allowed.
- i. Using one's position within Gatronova to gain advantages for personal projects.

Employees must disclose any potential conflicts of interest to their Head of Department or the HR department to ensure transparency and integrity.

## 5. Anti-Bribery and Corruption

Gatronova strictly prohibits any form of bribery, kickbacks, or monetary and non-monetary payments intended to secure business or personal benefits in the name of the company. Such practices undermine ethical conduct and are not tolerated. Violations of this policy can lead to severe disciplinary action.

Note: A detailed “Anti-Bribery and Corruption Policy (G&T/ABC/006)” is available on SuccessFactors and must be complied by all stakeholders.

## 6. Gifts and Business Entertainment

Gatronova has clear guidelines on gifts and business entertainment to prevent undue influence and maintain ethical standards:

- a. Accepting or giving gifts and entertainment must align with company policy and ethical practices.
- b. Excessive or inappropriate gifts perceived as attempts to obtain or retain business or personal favors are strictly prohibited.

Note: A detailed “Gifts, Business Entertainment and Hospitality Policy (G&T/GEH/005)” is available on SuccessFactors and must be complied by all stakeholders.

## 7. Harassment and Discrimination

Respect for individuals is a core value at Gatronova. We are committed to fostering an environment free from discrimination and harassment:

- a. Discrimination involves unfavorable treatment due to race, color, religion, gender, national origin, age, disability, or genetic information.
- b. Harassment includes unwelcome conduct related to any of these characteristics.
- c. Gatronova enforces strict policies to prevent and address such behavior to ensure everyone is treated with dignity.

Note: A detailed “Harassment and Discrimination Policy (HR/PO/HDP/01)” is available on SuccessFactors and must be complied by all stakeholders.

## 8. Whistle Blowing/Speak-Up

Transparency and accountability are highly valued at Gatronova. Employees are encouraged to report any unethical behavior, violations of company policy, or suspected wrongdoing without fear of retaliation:

- a. Secure reporting channels are in place to handle concerns seriously and investigate them promptly.
- b. Whistle-blowers are protected to maintain trust and integrity.

Note: A detailed “Whistle Blowing - Speak up Policy (G&T/WBL/011)” is available on SuccessFactors and must be complied by all stakeholders.

## 9. Compliance and Office Decorum

Maintaining office decorum and discipline is essential for a productive and respectful work environment. Employees are expected to:

- a. Adhere to punctuality and attendance policies.
- b. Dress appropriately as per the company dress code.
- c. Respect colleagues and promote harmony.
- d. Follow company policies on office resource use.
- e. Avoid disruptive behavior that impacts team morale.

Note: Detailed policies like “Time Management Policy (HR/PO/TMP/02)” and “Orientation Manual (HR/OTM/01)” are available on SuccessFactors and must be complied by all stakeholders.

## 10. Communication Norms

Respectful and clear communication with leadership and employees is vital for maintaining a professional workplace culture. It reflects on both individual professionalism and the organization's values. This includes:

### i. Addressing Colleagues

- a. Address line managers, peers, and subordinates by initials or names (e.g., "AK" or "Ahmed" for Mr. Ahmed Kamal).

### ii. Addressing Directors

- a. Address directors by initials or names with "sahab" or "Mr." (e.g., "RD," "Mr. Rizwan," or "Rizwan sb").
- b. Avoid terms like "Seth" to maintain professionalism.

### iii. Respectful Communication

- a. Maintain a professional and respectful tone; avoid offensive language or misinterpreted tones.
- b. Actively listen by giving full attention, avoiding interruptions, and providing constructive feedback.
- c. Focus on issues, not individuals, when providing feedback.
- d. Welcome feedback with openness and a willingness to improve.
- e. Foster equity, respect, and a culture where employees can express their thoughts and opinions openly.

### iv. Email Usage

- a. Use emails as the official channel for communication and approvals.
- b. Document all internal/external official correspondence through the Company email system:
  - Avoid "Reply All" or "CC" unless essential.
  - Respond to emails/messages promptly, acknowledging receipt and setting follow-up expectations.
  - Inform colleagues in advance if there will be delays in responding to their emails, messages, or requests.
  - Use standard email signatures, including extension numbers, for all emails.

### v. Social Media and Unofficial Content

- a. Only authorized individuals may publish company-related information on social media or any other such public media/platform.

- b. Avoid using the company's official email address for personal invitations, greeting emails, or unofficial content.

## 11. Confidentiality

Protecting the confidentiality of company information is essential:

- a. Employees must not disclose sensitive business information to unauthorized individuals.
- b. The duty to maintain confidentiality extends beyond employment or contractual relationships.

## 12. Integrity and Accountability

At Gatronova, we uphold the highest standards of integrity and accountability.

Employees are expected to demonstrate honesty, responsibility, and transparency in all aspects of their work. This commitment includes:

- a. Ensuring transparency in all business dealings and interactions.
- b. Taking ownership of responsibilities and acting in a trustworthy manner in all professional activities.
- c. Adhering to company policies and ethical guidelines to foster a culture of integrity.
- d. Reporting any discrepancies or unethical behavior promptly to maintain trust and accountability.

## 13. Health, Safety, and Community Responsibility

We prioritize safety, health, and environmental responsibility:

- a. Ensuring that all procedures are safe and sustainable.
- b. Promoting employee well-being and protecting the environment.

Fostering positive community relationships through responsible practices.

## 14. Breach of Code of Conduct

Details of disciplinary actions in case of policy violations are outlined below. These actions may include the following:

- a. **Advisory Note:** A formal communication issued for minor violations to caution the employee and guide them towards corrective behavior. This does not require a formal response from the employee.

- b. **Show-Cause Notice:** A formal document issued for more serious misconduct, requiring the employee to provide a written explanation or justification for their actions within a specified time frame.
- c. **Suspension:** Temporary removal from duties, with or without pay, implemented as a consequence of significant misconduct or while an investigation is conducted to determine the facts and appropriate action.
- d. **Termination:** Immediate dismissal for gross misconduct, such as fraud, harassment, or breaches of confidentiality or any other serious violation deemed to be falls under the code of conduct or unacceptable behavior at the sole discretion of the management.
- e. **Legal Action:** Pursued for criminal acts like theft, assault, or fraud, as per Pakistani laws.
- f. **Financial Recovery:** For damages to company property or financial loss caused by the breach.