

## CODE OF CONDUCT

Ghani Gases Limited (GGL) has laid down the following **Code of Conduct** hereinafter call (“the Code”) applicable to all employees (referred to collectively as ‘employees’) and sets expectations for compliance of the same at all levels.

Since the company began, uncompromising integrity and professionalism have been the cornerstones of GGL. In all that we do, GGL supports and upholds a set of core values and principles. Our future growth depends on each of us understanding these values and principles and continuously demonstrating the uncompromising integrity that is the foundation of our company.

This Code of Conduct will not supersede any other applicable legal or regulatory requirements of the country in which the Company carries out its business operations.

### COMPLIANCE

The Human Resources Department will act as Compliance Office for the code and will make sure the compliance of this code of conduct. In case of any queries and problems or issues relating to the compliance of this code anyone may contact with compliance office set up under this code of conduct. The Compliance Office is responsible for educating, training and developing understanding of the code to all the employees. The compliance office shall ensure that there are no breaches of the code and code is being duly followed by all the employees. It is responsibility of all employees to read, understand and apply this code during his day to day affairs.

If any employee fails to comply with this code of conduct he may be subjected to disciplinary action including the termination from employment. Disciplinary actions may vary depending on the severity of the matter in question, employee’s previous record, years of service and duties performed by him.

### 1. OBEY OF COMMANDMENTS

Management of the Company envisages its staff members shall obey the commandments of Almighty Allah and the Sunnah of our beloved Prophet Hazrat Muhammad (peace be upon him). All staff members shall offer their prayers in time and to preach of goodness, virtue and piety for discharge of their respective religious obligations.

### 2. CONDUCT OF BUSINESS

One of our core values is to conduct business with uncompromising integrity and professionalism. We put this value into practice by:

- Communicating clearly, respectfully, and professionally in business,
- Treating customers, suppliers, and others fairly,

- Acting as a responsible corporate citizen, respecting human rights, and managing the impact of our business on the world around us, and
- Keeping accurate financial and other books and records.

### **3. FOLLOW OF THE LAW**

As public listed company, Ghani Gases Limited shall comply with the laws of Pakistan in which it does business. We are each responsible for knowing and following all applicable laws or regulations.

We also must act in a manner that upholds the spirit and the intent of the law. Where the Code or company guidelines differ from local laws or regulations, we must always follow the higher standard.

### **4. TREATMENT TO OTHERS**

One of our core values is to work as a team with respect and trust for each other. We strive hard to uphold open and honest communication and to protect employees from discrimination, harassment, or unsafe practices

### **5. EQUAL EMPLOYMENT OPPORTUNITIES**

We value diversity in our workforce, as well as in our customers, suppliers, and others. We provide equal employment opportunity for all applicants and employees. We do not discriminate on the basis of race, color, religion, sex, national origin, ancestry, age, disability, medical condition, genetic information, military and veteran status, marital status, gender, gender expression, gender identity, sexual orientation, or any other characteristic protected by local law, regulation, or ordinance.

We follow these principles in all areas of employment including recruitment, hiring, training, promotion, compensation, benefits, transfer, and social and recreational programs.

### **6. ANTI-HARASSMENT**

We are committed to providing a workplace free of harassment based on personal characteristics such as race, color, religion, sex, national origin, ancestry, age, disability, medical condition, genetic information, military and veteran status, marital status, gender expression, gender identity, sexual orientation, or any other characteristic protected by local law, regulation, or ordinance. We strongly disapprove of and do not tolerate harassment of employees by managers or co-workers. We must treat co-workers, customers, and suppliers with dignity and respect.

We prohibit threats or acts of violence against co-workers, vendors, customers, or others. If you become aware of a threat or act of violent behavior in or near the GGL workplace, notify management of the details of the act or threat immediately. Managers who receive such information should immediately notify Security or Human Resources as applicable.

**7. HUMAN TRAFFICKING, CHILD AND FORCED LABOR**

We do not tolerate forced, debt bonded, indentured labor practices, or human trafficking. GGL does not allow harsh or inhumane treatment, including corporal punishment or the threat of corporal punishment. We will not employ anyone under the age of 16 in any position, and workers under the age of 18 should not perform hazardous work. We expect our suppliers and others to meet these expectations.

**8. HEALTH AND SAFETY**

GGL arranges a safe working environment for its employees in its business premises. The safety of employees, customers and general public at large is the important matter on the Company's production facilities, offices and any other place where the Company carries out its business processes. Employees are required to strictly abide by the safety policies and procedures. In case of any injuries during the duty to the non-employees and property of the company the employees should immediately report to their seniors or managers.

We believe workplace injuries and illnesses are preventable. When we take care, employees and suppliers at our workplaces need to obey the safety requirements that apply to our job and workplace. We must not begin or continue any work activity contrary to safety requirements.

**9. FITNESS AND ATTENDANCE**

Employees must be mentally and physically fit for their duties. To perform their duties efficiently and effectively the employees must not use un-prescribed medicine which impairs their abilities to perform duties. An employee must inform to his senior or supervisor if he is unable to come on duty. To ensure the compliance with the fitness and reporting and an employee should have the contact information of his senior or manager.

**10. ANTI DISCRIMINATION ENVIRONMENT**

GGL will endeavor to maintain an environment that is free from discrimination and where all employees are given due respect. Discrimination connotes any action that creates an intimidating, hostile or offensive work environment. Discrimination includes the actions including sexual harassment, disparaging comments on the basis of gender, religion, race or ethnicity. The Company will take appropriate measures to ensure an environment where there is no discrimination on the work place. Every employee has the right to be protected from any kind of harassment. The principles of equal treatment apply on all the employees during daily dealings with each other and to all processes relating to the working relationship. The same principles apply to the employees during the process of appointment, promotions and performance of duties.

## 11. ENVIRONMENTAL PROTECTION

In order to protect the environment, employees should:

- Ensure that Company's facilities and processes are operated in a manner so as to ensure the trust of society, at all.
- Protect the resources for minimization of waste material and the minimization of the release of hazardous materials into the environment.
- Provide the employees customers, suppliers, government authorities and related communities with appropriate information and decision making.
- Improve environmental protection and awareness about the environment.

## 12. WORKPLACE ENVIRONMENT

Employee should not engage in acts of threats and violence. It is the duty of an employee to maintain a safe and secure workplace and avoid acts or threats of physical violence, intimidation, harassment or coercion, stalking, sabotage, and similar activities. An employee must not bring or use any type of weapon on the Company owned or leased premises whether he is on job or off duty otherwise than he is authorized and/or has a legitimate business reason to do so. Employees found responsible to be engaged in such activities will be subjected to disciplinary actions including termination from job.

## 13. PROTECTION OF ASSETS

Employees should exercise their business prudence and should protect the Company's assets and ensure the efficient use of these assets during the discharge of their duties. Employees should follow the acquisition, use, maintenance and disposal policies of the Company regarding these assets.

All Company assets must be used for business purposes of the Company only. Employees may use the Company assets on limited basis with the permission of the senior or managers.

## 14. INFORMATION SYSTEM SECURITY

Employees are responsible for ensuring the security of the Company's computers and information system by complying with the Company's information technology policy and procedures. It is the responsibility of an employee that he:

- Doesn't share passwords or other access details with other employees and doesn't use another employee's password.
- Uses only approved and licensed or purchased software on the Company's computer systems.
- Connect only the Company's computers and equipment to the Company's computer networks.
- Doesn't attack security controls on a computer system of the Company or Company's computer network.
- Doesn't access or download irrelevant websites, materials and files.

**15. CONFLICTS OF INTEREST**

A conflict of interest may occur when an employee's personal or family interests interfere or even appear to interfere with the employee's ability to make sound business decisions in the best interest of GGL. We should not put ourselves in situations where we could be tempted to make GGL business decisions that put our personal needs ahead of GGL's interests.

**16. SOCIAL MEDIA SITES**

Use of social networking sites is common among people to share the information. Employees of GGL are prohibited to share the information through social media channels on behalf of the Company unless they are officially designated Company spokesperson whether they are using the company's or personal systems or devices. If an employee contravenes the Company's policy and shares any information related to Company he is personally accountable and liable for the consequences. The Company does not take any responsibility for such unauthorized disclosure of information.

**17. GIFTS, MEALS, ENTERTAINMENT, AND TRAVEL**

The exchange or provision of gifts, meals, entertainment and travel ("GMET") may create a real or perceived conflict of interest or a situation where those expenses could be viewed as a bribe under applicable laws and international standards. GGL expects its employees and third parties to comply with the following principles when giving or receiving GMET:

- We comply with anti-corruption laws.
- The company maintains the high standards of integrity and business ethics.
- The GMET must be for a legitimate purpose, such as to promote, demonstrate, or explain a company product, position, or service.
- The GMET must not place the recipient under any obligation. We do not offer, promise, or give anything of value with the intent to improperly influence any act or decision of the recipient in GGL or your company's favor, or with the intent of compromising the recipient's objectivity in making business decisions.
- The GMET must be made openly and transparent, be reasonable, and appropriate to the business relationship and local customs, and not cause embarrassment by its disclosure.
- Accurately record all GMET provided on Ghani Gases Limited's behalf.

**18. CONFIDENTIALITY OF INFORMATION**

Employees are prohibited from keeping copies of correspondence, documents, papers and records, list of suppliers or consumers without proper authorization of management of the Company. Company's information and records should be kept on Company premises and

unpublished information may be disclosed to any individual and organization with prior Management advice.

#### **19. CORPORATE GOVERNANCE**

GGL makes compliance with the requirements of all governmental and regulatory bodies and is committed to high standards of corporate governance. The Company is fully compliant to its obligations under the Listing Rules of Stock Exchange being a listed member.

#### **20. FINANCIAL REPORTING COMPLIANCE**

GGL ensures compliance with accepted accounting rules and procedure at all times. Besides that all transactions must be properly and fully recorded and authorized. Records and documents are not false or misleading and no undisclosed and unrecorded account, fund or asset is established. Corporate payment(s) are approved or made with the supporting document(s) and for the purpose of the Company's business. Information provided to the external auditors must be complete and is not misleading in any way.

#### **21. ALCOHOL, DRUG, GAMBLING AND SMOKING**

Employees are prohibited from using alcohol and drugs within the Company premises. Smoking within head office, plant premises, offices, work places, workshops, stores, laboratories and warehouses is not allowed. All the employees are expected not to involve themselves in any kind of gambling and drugs during their duties and members of the staff, not abiding by these prohibitions will attract disciplinary as well as penal action as required by law.

#### **22. INSIDE TRADING**

Executives are prohibited from dealing in the shares of the Company whether directly or indirectly during the closed period before the financial results are announced. The closed periods normally starts from the day when any document, which forms the basis of price sensitive information, is sent to the Board and ends on the day when the information available to the public.

If an executive of the Company or his spouse transacts directly or indirectly in shares of the Company in before or after the Closed Period he shall immediately communicate in writing to the Company Secretary of such transaction. Executive dealing so shall also deliver a written record of the price, number of shares, form of share certificates and the nature of transaction to the Company Secretary within four days of effecting the transaction.

#### **23. COORDINATION**

All staff members will work in close coordination with their co-workers, supervisors and colleagues. Every member will cooperate with other members so that the company's work may be carried out effectively and efficiently. All cases of non-cooperation among staff members should be reported to the management for necessary and suitable action. Strict action will be taken against those staff members who violate the rules and regulations of the company.

**24. NON COMPLIANCE**

Any breach of this Code by the employees of the Company will be investigated by the Compliance Office. It may also be investigated/ trialed externally by courts of law of Pakistan and actions will be taken in the light of labor laws and decisions of the Courts.

This code is the source of guidance for conduct and applies to all employees including managers, staff and workers of Ghani Gases Limited. Employees are required to follow the code of conduct. It is the responsibility of all the employees to read, understand and apply this code in performing their duties and their day to day affairs.