

THAL LIMITED

CODE OF CONDUCT & ETHICS

Applicability of the Code:

- The Directors and Management are required to enforce the Code and ensure that none of the elements are breached at any time.
- Employees are required to familiarize themselves with the Code, understand the Code, abide by the Code and live the spirit of the Code.

Company Ethics

- All Company activities are to be conducted with honesty, integrity and respect within and outside the company.
- The Company does not support or oppose any political or religious party / group, and does not contribute funds to any individual or group that promotes or opposes such activities.
- The Company promotes a non-discriminatory working environment, which is safe, free from racial or sexual harassment and conducive to being an equal opportunity employer.
- The Company is committed to delivering the quality and quantity of products and services promised to its customers, within the agreed timeframe.
- The Company is dedicated to protecting the environment, conserving precious energy and promoting sustainable resources
- The Company is committed to abide by the Competition Laws of Pakistan.
- The Company is dedicated to enforcing the spirit of the Code of Corporate Governance.
- The Company is committed to the development of the community it operates in and recognizes its social responsibilities to the community and country.

Code of Conduct for Directors:

Conflict of Interest

- i. Any conflicts of interest with the Company must be disclosed by the concerned Director in the ensuing Board meeting.
- ii. The Directors must ensure that all their actions and decisions are transparent and in the interest of the Company.

Regulatory Compliances, Financial Information and Controls

- i. The Directors are committed toward the spirit of Code of Corporate Governance and also ensure the compliance of laws, rules and regulations.
- ii. Any material information and disclosures will be made public within the required / specified time frame, as per SECP requirements.
- iii. The Directors in knowledge of confidential information, by nature of their position, are required to ensure secrecy and safeguard the same, till such time that it is made public, and avoid any chance of "insider trading".

Compliances

- i. The Directors will ensure that the Company meets all its compliances as required to conduct the business.

Personal Conduct

- i. The Directors shall intimate those matters to the Company as are required to be disclosed according to the statutory provisions.

Code of Conduct for Employees:**Conflict of Interest**

- i. Any employee who becomes aware of a conflict of interest, for any reason and in any context, irrespective of whether it pertains to his/her immediate department, area or jurisdiction, is required to immediately report the matter to management for consideration and information, in a complete and honest manner.
- ii. Accepting gifts, favors or any other form of obligation, that may compromise decision making, from other employees, suppliers, customers or any other stakeholder is strictly forbidden. Employees are required to inform their superior of any such activity and should politely decline to accept the same.
- iii. Employees must not engage in any activity or transaction which may give rise, or which may be seen to have given rise, to conflict of interest.

Regulatory Compliances, Financial Information and Controls

- i. Employees in knowledge of confidential information, by nature of their position or job description, are required to ensure secrecy and safeguard the same, till such time that it is made public, and avoid any chance of "insider trading".
- ii. The Employees are required to ensure compliance to applicable laws, rules and regulations.
- iii. Any material information and disclosures will be made public within the required / specified time frame, as per SECP requirements.

Health, Safety & Environment

- i. Employees should be aware of and conform to Health & Safety Standards of the Company at all times, throughout all the operations and offices of the Company, and encourage suppliers and customers to adopt the same.
- ii. Employees are responsible to use Protective Gears, wherever applicable, and should not indulge in any hazardous activities that may jeopardize their lives, lives of others and / or company assets.
- iii. Employees are encouraged to abide by all applicable environmental laws, and ensure all wastes and outflow of affluent are properly treated to avoid any degradation of the environment.

Personal Conduct

- i. Employees, are required to conduct themselves in a professional manner, whereby no employee is allowed to harass, discriminate, intimidate, humiliate, disturb, restrict or interfere in another

employee's work, or create a hostile work environment for their fellow colleagues.

- ii. Employees are responsible for their behavior and must ensure that all their actions are executed in a transparent and fair manner.
- iii. Any form of substance abuse – unless under medical advice – will not be tolerated within the work environment. Additionally, employees being representatives of the Company, are required to conduct themselves in an acceptable manner even outside the work place.
- iv. Employees, in particular those that operate machinery and other equipment, are required to disclose any medical conditions, medication or treatment that may impair their ability to perform their task.
- v. Employees must record and report all transactions – receipts, payments, consumptions, assets & liabilities – of the Company in an accurate and timely manner.