

# Policy of Code of Conduct

The Code of Conduct of UDL International Limited (UDLI) reflects our standard for proper behavior and corporate values. It is a fundamental policy of the Company to conduct its business with honesty, integrity and in accordance with the highest professional, ethical and legal standards. This Code of Conduct applies to all the people relating to UDLI including Directors, Senior Management, Officers, other Employees and Staff.

The Code fosters the culture that each member of the Board and staff is responsible to reflect integrity and leadership with the provisions of the Mission, Vision, UDLI policies and all applicable statutory guidelines for the UDLI.

It encourages the employees to work proficiently with due diligence in following the internal policies of the UDLI for dealing with each other, customers and all third parties related directly or indirectly with the UDLI.

The Salient features of the Code are explained below:

## **1. Conflict of Interest**

Each Director and employee should exercise its judgment in order to avoid association with any other activity, person or organization that conflicts with or appear to conflict with the best interests of the UDLI. Any situation which may involve a conflict of interest or reasonably expected to involve such conflict should be disclosed promptly.

## **2. Protection of the Proprietary information**

All the trade secrets, other proprietary information and business data of the UDLI are valuable assets. All the Directors and employees who are entrusted with such information are responsible to properly safeguard and do not disclose such information, data and knowledge to any person except such information which is made public in compliance with statutory requirement by the UDLI or is given proper authority in writing to disclose such information for any specific purpose.

## **3. Honesty, Integrity and ethical standards**

All Directors and employees must act honestly, fairly and exhibit highest level of integrity and ethical standards in dealing with all the share holders of the UDLI. Employees must deal ethically with all the customers, suppliers and other parties with fair consideration and without any personal favor. During the course of any business interaction, the employees should ensure that UDLI name, integrity and reputation should not be damaged if such interaction becomes public in any manner.

#### **4. Political contribution**

No funds or assets of the UDLI may be contributed to any political party or organization or any person who holds an office of public importance.

#### **5. Bribes**

No amount may be paid or received in cash or in kind on account of bribes or for any such matter which helps in influencing any decision relating to the UDLI interests or compromise independent judgment government staff or customer.

#### **6. Compliance with laws and regulations**

All Directors and employees must ensure to comply with all the Laws, guidelines, regulations and directives as issued by Securities & Exchange Commission of Pakistan, Stock Exchanges and other bodies.

#### **7. Charity and voluntary work**

The UDLI encourages the culture of mutual help, assistance, charity and voluntary work in time of need of any person or community. All Directors and employees are encouraged to participate in such activities of national calamity like floods, earthquake or other social work.

#### **8. Communication and disclosure**

The Directors will take steps to ensure that employees are encouraged to communicate with their seniors or any other appropriate person in regard to ethical practices or when in doubt about a course of action in any particular situation. Employees must be encouraged to report violation of rules, regulations, laws, or internal policies of the UDLI without any fear of retaliation or retribution.

#### **9. Family connections and employment of relatives**

Any dealing with any customer or third party or organization where the employee has a direct or indirect or family connection must be promptly disclosed to the UDLI.

## **10. General Discipline**

No Assets of the UDLI or belongings of the employees should be used without specific permission. All employees must adhere to the Services' Rules of the UDLI.

All employees are encouraged to report any suspected violation of this Code of Conduct to their Line Managers (Functional Heads) or their respective Directors.