

House Building Finance Company

HR Group HR Policies Manual		
Policy No. COC/HRG/2018	Title: Code of Conduct	Approval Date: 30-08-2018
Revision No. 00		Effective Date: 07-09-2018
Prepared by: _____ Sd/- _____ HR Group	Recommended by: _____ Sd/- _____ HR Committee of Board	Approved by: _____ Sd/- _____ Board of Directors

1. Introduction

House Building Finance Company (HBFC) expects from its employees to act in accordance with the highest standards of personal and professional integrity in all aspects of their activities and to comply with all applicable laws, regulations and policies. By accepting a position with HBFC, the employees become accountable for compliance with institutional policies, regulatory guidelines and all applicable laws of the land, along with this Code of Conduct (Code).

2. Objective

To set the highest standards of ethical behavior, integrity, accountability, courage and excellence.

3. Scope

This policy is applicable to all regular and contractual employees of HBFC, and employees deputed in HBFC from other organizations.

4. Policy

All employees working in HBFC shall be bound to follow this Code while performing their duties. The components of code are provided as follows:

4.1. Fraud, Embezzlement & Misrepresentation

- a. The employees shall not commit or assist any activity that involves making false statement, fraud, forgery, misappropriation, theft, embezzlement, bribery, misrepresentation, violation of HBFC rules, regulations, policies and procedures and/or any similar activity that harms or may harm the interest and reputation of HBFC.
- b. The employees shall be honest in conveying professional conclusions, opinions, research and findings for whatever purpose and shall not manipulate the system for personal gains.

House Building Finance Company

- c. The employees shall not indulge in any activity during off-duty hours that directly or indirectly undermines the provisions of this Code of Conduct or business of HBFC.
- d. The employees shall strictly comply with HBFC's security measures, as well as the health, safety and energy conservation regulations adopted by HBFC from time to time.
- e. All concerned shall comply with all policies and procedures of HBFC as amended or formulated from time to time.

4.2. Discrimination and Harassment

- a. The employees are expected to treat all internal and external stakeholders with respect, fairness and courtesy and avoid all such forms of behavior that create or may create an atmosphere of harassment, hostility, intimidation and discrimination of any kind.
- b. The employees shall not propagate anything in any manner whatsoever that may result in sectarianism, or ethnic/ religious/ gender bias or hatred.
- c. The employees shall not exercise any partiality or favoritism on the basis of gender/ ethnicity/ religion.
- d. No employee shall indulge in nepotism, victimization or willful abuse of power.
- e. The employees shall treat each other with respect and not indulge in unwarranted negative criticism or gossip about other employees.
- f. All concerned shall avoid creating/sending/forwarding electronic or any other form of communication that contains statements or material which is discriminatory, offensive, defamatory, illegal or constituting harassment.
- g. All concerned shall refrain from engaging in any form of inappropriate relationship with persons with whom they have a professional relationship. Therefore, all concerned shall be careful in words and conduct to avoid placing, or seeming to place, pressure on subordinates or colleagues that could cause them to deviate from acceptable ethical behavior.
- h. HBFC shall not tolerate harassment or discrimination of any kind, especially involving, age, gender, health, ancestry, physical disability, race, religion, length of service, political beliefs, marital status or family structure.

4.3 Employees' Conduct

- a. All employees are expected to establish and maintain a climate favorable to the development of harmonious and effective work relationships with their colleagues and customers.

Travel

House Building Finance Company

- b. All employees must abide by the statutory and regulatory laws of Pakistan.
- c. All employees are expected to comply with the office timings and work attendance to ensure that work commitments are not disrupted and deliverables are met within schedule.
- d. All employees are required to observe appropriate dress code for the work environment. Cleanliness and personal hygiene should also be given due importance while attending work.
- e. Use of social network, networking sites, business or professional networks and blogging is prohibited at the workplace, unless it is relevant to an employee's responsibilities and recommended by the supervisor.
- f. An employee shall keep himself/herself updated with the relevant policies, rules and regulations of HBFC regarding employee conduct.
- g. An employee shall not exert external pressure on the management for a favorable decision in any matter.

4.4 Confidentiality

- a. An employee shall maintain strict confidentiality of HBFC and its constituent affairs and shall not communicate directly or indirectly to any person or entity including press, ex-employee or general public, any document or information which has come into his/her possession in the course of official duties, unless the employee is instructed to do so by the competent authority or otherwise required to convey such document or information in the discharge of his/her duties.
- b. Confidential information concerning a customer or a supplier shall not be disclosed to a third party except pursuant to applicable laws or regulations, or a court order or other legal process, or after the informed consent of the customer or supplier in writing.

4.5 Use of HBFC Assets and Resources

- a. All employees are required to use HBFC assets such as properties, office equipment, supplies etc. for HBFC's business purposes and not for gain or benefit of persons or entities other than HBFC, including self.
- b. Material information such as information contained in any file, document, note, report, letter, fax, USB, email, instrument etc. must be used solely for the purpose of HBFC business and returned to HBFC upon cessation of employment/contract agreement.

House Building Finance Company

- c. Official information, documents, reports, proposals research papers, software etc. developed using HBFC time and resources constitute HBFC's intellectual property being work for hire. An employee will neither have the right to claim these as his/her own, nor shall s/he use/exploit the same for personal gain or benefit of persons or entities other than HBFC during or beyond cessation of their employment with HBFC.
- d. All employees must limit internet usage when in HBFC to official business purposes only and must strictly follow HBFC Email Usage Policy/HBFC Desktop Usage Policy, as amended from time to time.
- e. Employee shall hand over to the immediate supervisor, at the time of cessation of employment, all information in their custody, which is the property of the HBFC, including intellectual property as defined above.
- f. Any employee, when in doubt, shall seek advice from others including their supervisors, colleagues, HR Group or Legal Services Group.

4.6 Internal and External Communications

a. Communication with Regulatory Authorities

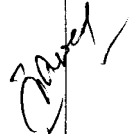
HBFC deals with its regulators in an open and co-operative manner by providing complete, relevant, accurate and credible information on time. Only authorized employees shall communicate with the regulatory authorities who shall show courtesy and professionalism in all correspondence.

b. Communication with Media

Only specifically designated employees of the Company shall be responsible for HBFC's relationship and communication with the Press. The information on HBFC's structure, financial performance, products and services and position on issues that the organization wish to share shall be publicly available through journals such as annual and interim reports, press releases, published speeches and statements and marketing brochures. An employee may request brochures or marketing pieces from the Marketing Team and share them with any external audience. Should an employee receive any inquiries about HBFC from the media, they may not offer any comments, except to state that the inquiry may be referred to the Media Function.

4.7 Use of Alcohol, Drugs and Smoking

HBFC is committed to a workplace free from all intoxicating products prohibited by Sharia and ethical practices. Therefore, consumption of alcoholic drinks, intoxicants and/or drugs by the employees of HBFC is strictly prohibited. Similarly smoking is also strictly prohibited in all



House Building Finance Company

public places in HBFC. Furthermore, consuming chewable Pan, Gutka, and Naswar etc. are also strictly prohibited at the office premises during and after the working hours.

4.8 Affiliation with Political Party

HBFC prohibits its employees to have any active involvement in any political party during the course of their employment. No employee shall indulge in forming a political, ethical or linguistic association or joining it as a member or as an office-bearer.

4.9 Outside Employment

An employee may not without the previous sanction of the competent authority engage in any trade, or undertake any employment other than his/her official duties. An employee may, however, undertake occasional work of a literary, scholarly or artistic character, provided that his/her official duties do not suffer thereby; but HBFC may in its discretion, at any time forbid him/her to undertake or require him/her to abandon such work which in its opinion is or has become detrimental to the interest of the HBFC.

4.10 Post-Employment Contacts and Non-Public Information

Employees must maintain confidentiality of non-public information (i.e. all information relating to HBFC or its customers except such information which is already lawfully available in the public domain or specifically allowed by HBFC to be shared with the public) to which they had access during their employment with HBFC and even after they cease to be employees of the organization. At the time of termination of employment, employees shall surrender all company's documents, laptops, files, computer diskettes/CDs, USB flash drives, reports and records containing any customer, company or other non-public information.

5. Revision of Code of Conduct

This Policy shall be reviewed after every three years or earlier if deemed necessary on account of developments in the internal and external operating environment of HBFC as well as amendments in regulatory framework.

6. Violation of Code of Conduct

Any violation of the Code of Conduct may be liable to disciplinary action as per disciplinary rules amended from time to time.

7. Interpretation

- a. This Code of Conduct shall apply in addition to any other appropriate conduct requirements provided in the HR Manual.
- b. In case of any ambiguity in understanding this policy, the interpretation of MD will be treated as final.
