



## CODE OF CONDUCT

The entire organization of **Sakrand Sugar Mills Limited** will be guided by the following principles in its pursuit of excellence in all activities for the attainment of the Company objectives.

### As Director

- Commit to all necessary and appropriate resources;
- Maintain a conducive environment through responsive policies;
- Maintain organizational effectiveness for the achievement of the Company goals;
- Encourage and support compliance of legal and industry requirement;
- Protect the interest and assets of the Company;
- Comply with all of the laws, rules, and regulations of Pakistan and other countries applicable to either Company or its business.
- Avoid conflict of interest, and timely disclosure to Chairman of the Board or Company Secretary;
- Should not use corporate property, information or position for the personal gain; or compete with the Company;
- Maintain the confidentiality of the confidential information entrusted to them either Company, except, when applicable company authorized disclosure or disclosure is required by laws, regulations, or legal proceedings.
- Should not deal in the shares of the Company in any manner during the closed period prior the announcement of financial results;

### As Executive Managers

- Ensure the profitability of the Operations;
- Provide the direction and leadership for the organization;
- Ensure total customer satisfaction through excellent product and services;
- Promote a culture of excellence, conservation, and continual improvement;
- Cultivate works ethics and harmony among colleague and associates;
- Encourage initiative and self-realization in employees through meaningful empowerment;
- Institute commitment to environmental, health and safety performance.
- Comply with all of the laws, rules, and regulations of Pakistan and other countries applicable to either Company or its business.
- Avoid conflict of interest, and timely disclosure to Chairman of the Board or Company Secretary;
- Should not use corporate property, information or position for the personal gain; or compete with the Company;
- Maintain the confidentiality of the confidential information entrusted to them either Company, except, when applicable company authorized disclosure or disclosure is required by laws, regulations, or legal proceedings;

- Should not deal in the shares of the Company in any manner during the closed period prior the announcement of financial results;

### **As Employee and Staff**

- Devote productive time and efforts;
- Observe Company policies and regulations;
- Promote and protect the interest of the Company;
- Strive for excellence and quality;
- Must avoid making personal gain (other than authorized salary and benefits) at the Company's expense, participating in or assisting activities which compete with working for any customer or suppliers of and hold any ownership interest in customer, supplier, distributor or competitor.
- Must be mentally and physically fit and should remain fit for the work.
- Must inform to his/her senior or supervisor if he /she is unable to come at the place of his/her duty.

Following are the specific fields / guidelines in this respect: -

### **Health and safety**

Every staff member should take responsible care to ensure the health and safety of his/her self and others, who may be affected by his /her acts or omission at work. Staff / members should not tamper with or misuse any item provided by the Company to secure the safety, health and welfare of its staff and for the protection of the environment.

### **Environment**

To Preserve and protect the environment, all staff members should:

- Design and operate the Company's facilities and processes so as to ensure the trust of adjoining communities.
- Promote resource conservations, waste minimization and minimization of the release of chemicals /gas into the environment.
- Provide employees customers, suppliers, public authorities and communities with appropriate information for informed decision making; and
- Strive continuously to improve environmental awareness and protection.

### **Workplace Violence**

An employee must not engage in acts or threats of violence. It is the duty of an employee to maintain a safe workplace and avoid acts or threats of physical violence, intimidation, harassment or coercion, stalking, sabotage, and similar activities. Employees who are engaged in such activities will be terminated.

### **Confidentiality**

Staff member should not keep or make copies of correspondence, documents, paper and records, list of suppliers or consumers without the consent of the Company. Company's information and records should be kept on Company premises only and unpublished information may not be disclosed to external organization / individuals only on "need to know" basis. In case of doubt in this regards, the Management's should be sought.

### Insider Trading

The employee must adhere to the Company policy on insider trading. An employee must follow the principle of confidentiality and must not disclose any information in the public unless the financial results are declared.

### Financial Integrity

- Compliance with accepted accounting rules and procedure is required at all times. In addition to being duly authorized, all transaction must be properly and fully recorded. No record entry of document may be false or misleading and no undisclosed and unrecorded accounts, fund asset may be established or maintained. No corporate payments may be requested, approved or made with the intention that any part of such payment is to be used for any purpose other than as described in documents supporting it.
- All information supplied to the Auditor must be complete and not misleading.
- You will not knowingly assist fraudulent activities (e.g. tax evasion) by others. If for any reason to believe that fraudulent activities are taking place (whether within or by others with whom we do business), you must report it to manager immediately.

### Regulatory Compliance and Corporate Governance

**Sakrand Sugar Mills Limited** co-operates with all governmental and regulatory bodies and is committed to high standards of corporate governance. We are fully compliant to our obligations as envisaged under the Listing Rules of Stock Exchange, of whom **Sakrand Sugar Mills Limited** is a listed member.

### Modification and amendment

The above Code of Conduct may be amended, as necessary, from time to time. Any amendment therein shall be made by way of an addendum, duly recommended by the CEO and approved by the Board of Directors.

Approved by:

Board of Directors