

# **RAILWAY CONSTRUCTIONS PAKISTAN LIMITED, ISLAMABAD**

## **GENERAL CODE OF CONDUCT**

### ***OUR VALUES***

---

Railway Constructions Pakistan Limited (RAILCOP) (The “Company”) is committed to conducting its business ethically, responsibly and with excellence. We expect all of our directors, executive officers and employees (The “Employees”), our partners, including suppliers, subcontractors, agents, and joint venture partners if any (The “Partners”) to conduct themselves in accordance with the legal and ethical standards of Conduct we hold ourselves to.

The Company values emphasize everything it does. As an employer, we apply our values to our employees by striving to create a positive workplace environment for all employees, provide training and development opportunities to foster professional growth, provide a safe and healthy workplace by implementing the highest international safety standards, respect employees’ rights to freedom of association, and ensure employment is on the basis of qualification and not race, gender, or religion.

### ***CODE OF CONDUCT***

---

The Code of Conduct contains the policies that relate to the legal and ethical standards of conduct that we expect our employees and partners to comply with while carrying out their duties and responsibilities on behalf of the Company. Compliance with these principles is a condition of employment or engagement with the Company.

The Company acknowledges that the Code of Conduct cannot anticipate every situation an employee or Party or a joint venture partner may face. The Company therefore, expects all of its employees, parties and partners to apply the Code of Conduct in their activities, to exercise independent professional judgment and to deter wrongdoing in the conduct of all duties and responsibilities on behalf of the Company.

### **REPORTING OF ILLEGAL OR UNETHICAL BEHAVIOUR**

Employees should promote ethical behaviour and encourage other employees to talk to supervisors, managers or other appropriate personnel when in doubt about the best course of action in a particular situation. We require that any incidence of misconduct, conflict of interest, or illegal activity be reported to [railcop@railcop-pk.com](mailto:railcop@railcop-pk.com). All issues reported are confidential and will be treated seriously and discreetly. Employees may report anonymously should that be their preference. The Company will not allow retaliation for reports made in good faith.

### **AMENDMENTS AND WAIVERS**

Any amendments to or waiver of this Code of Conduct shall be made only by the Board of Directors of Railway Constructions Pakistan Limited upon the recommendation of the constituted and Nominated Committees from time to time. If an amendment to or waiver of this Code of Conduct is made or granted, appropriate disclosure will be made as required by applicable Laws and Regulations.

## **I. ETHICS**

### **BUSINESS INTEGRITY**

The Company conducts its business free from corruption or fraud and expects the same from its employees and partners. The Company and its employees do not receive or offer tangible or intangible bribes in any form.

### **CONFLICTS OF INTEREST**

All employees should avoid conflicts of interest between themselves and the Company. A “Conflict of Interest” can occur when the private interest of an employee interferes in any way – or even appears to interfere – with the interests of the Company as a whole.

Employees are therefore prohibited from (a) taking for themselves personally opportunities that are discovered through the use of corporate property, information or position, (b) using corporate property, information or position for personal gain, and (c) competing with the Company.

### **INSIDER TRADING**

Employees may come across information that is not yet publicly available, but which could be valuable to investors. None should disclose or use non-public information that a reasonable investor would consider important when deciding whether to trade. All Employees must comply with the Company’s *Insider Trading Code*.

### **CONFIDENTIAL INFORMATION**

Employees should maintain the confidentiality of information entrusted to them by the Company or its customers, except when disclosure is authorized or legally mandated. “Confidential information” includes all non-public information that might be of use to competitors, or harmful to the Company or its customers, if disclosed.

### **COMPLIANCE WITH LAWS, RULES AND REGULATIONS**

Employees should comply with the laws, rules and regulations applicable to the Company.

The Laws, Rules and Regulations applicable to contracting with Government entities are complex and may impose different and special requirements on the Company. Failure to comply with these requirements may be a criminal offence. Employees should comply with these requirements and questions regarding compliance should be referred to appropriate personnel or outside counsel as necessary.

### **PROTECTION AND PROPER USE OF COMPANY ASSETS**

Employees should protect the Company’s assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company’s profitability. All Company assets should be used for legitimate business purposes.

## **II. EXCELLENCE**

### **RELATIONSHIPS WITH OTHER PARTIES**

Employees should endeavour to deal fairly with the Company's customers, suppliers, competitors and employees. None should take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

### **HARASSMENT, BULLYING AND DISCRIMINATION**

Employees are expected to treat all individuals with respect, tolerance, dignity and without prejudice to create a mutually respectful and positive working environment. The Company will not tolerate any form of harassment or bullying.

### **FAIR COMPETITION**

The Company is committed to the principle of free enterprise and seeks to compete fairly. The Company and our employees adhere to laws and regulations which are designed to ensure effective competition.

### **ACCOUNTABILITY**

Employees are each held accountable for Code of Conduct compliance with regard to issues within his or her control. Sanctions for a breach of this Code of Conduct shall be determined by the Board or the appropriate officer as designated by the Board. Sanctions may include serious disciplinary action, suspension from office or dismissal, or other remedies all to the extent permitted by law and as deemed appropriate under the circumstances.

### **ACCURATE RECORD KEEPING AND REPORTING**

Employees should accurately reflect the transactions of the Company in its books, records, accounts and reports and should maintain an adequate system of internal controls and disclosure controls to promote compliance with the laws, rules and regulations applicable to the Company. Falsification of any Company record is prohibited. All reports, documents or communications authorized or legally mandated for disclosure to the public should be full, fair, accurate, timely and understandable. All business transactions are reflected accurately and fairly in the Company's accounts in accordance with international established accounting standards.

### **COMMUNICATIONS**

The Company's policy is to disclose or communicate matters that may influence the share price in a timely and accurate manner.

The interim and annual financial results announcements, other important announcements, and corporate governance documents concerning the Company are published on the Company's website.

### ***III. RESPONSIBILITY***

#### **PROTECTING THE ENVIRONMENT**

The Company is committed to being an environmental protector by implementing the best technology available where applicable to minimize its environmental footprints and promote best sustainable business practices.

#### **HEALTH AND SAFETY**

The Company is committed to provide a safe and healthy workplace and to educate and train each employee in safe work practices. No person shall be required or instructed to work in surroundings or under conditions that are insecure or hazardous to his or her health. Each employee must take responsibility to become aware of the hazards associated with their workplace and tasks they are to perform. Each employee is responsible to complying with applicable safety requirements, wearing prescribed safety equipment, and preventing avoidable accidents. Each employee has a duty to report workplace conditions or practices that pose a safety hazard or threaten the environment and to take reasonable actions to alleviate such risks.

#### **COMMUNITY INVOLVEMENT**

The Company strives to cultivate a local identity in each of its host communities by employing local talent and setting global good corporate citizenship standards, all while respecting local sensitivities.

The Company will regularly contribute to the economic and social development with communities, and expects all employees to promote human rights and respectful community involvement.