

IN MEMORY OF SHAHEED MOHTARMA BENAZIR BHUTTO



STATEMENT OF ETHICS AND BUSINESS PRACTICES

This Statement of Ethics and Business Practices applies to all Employees of Sindh Leasing Company Limited. The purpose of this statement is to set forth certain standards and rules of conduct followed in the corporate entities, globally. Our culture of ethics and integrity shall from the beginning define who we are as a Company and how we as colleagues treat each other, our customers and stakeholders.

This Statement of Ethics and Business Practices attempts to introduce the Employees to the types of attitudes and conduct that create an honest, fair and legal workplace. It will be surrounded by 3 basic beliefs:

- Respect for the individual
- Service to the Customer
- Striving for Excellence

General Principles and Significant Aspects of Code of Ethics:

1. We will abide by the laws of the Country in all activities at work and beyond. Any suspected material violation of a law, regulation or ethical standard must be reported to the appropriate level of authority within the Company. Where appropriate, the authority will report to the relevant statutory authority.
2. We will always demonstrate high standard of conduct at work place or outside as good citizens of Pakistan.
3. We will adhere to a high level of professional practices commensurate with the Leasing Company's aim to achieve growth in earning for shareholders over the long term undertaking business compatible with our character and business norms.
4. We will behave with integrity and honesty in our dealing with customers, colleagues, supervisors and all others with whom we interact.
5. We, as the employees of Sindh Leasing Company Limited, have a responsibility towards all stakeholders to make decisions strictly on the basis of Company's interests, without regard to personal gain. A conflict of interest can arise when one's judgment could be influenced, or might appear as being influenced, by the possibility of personal benefit. Even if it's not intentional, the appearance of a conflict may be just as damaging to employee's and Company's reputation, as an actual conflict. We would always be on the lookout for situations that may create a conflict of interest, and do everything we can to avoid them.

6. Situation may arise holding an employee in conflict of his interest with the interest of the Company. In such situation, to enable the Company to make an objective decision, the employee must declare in advance the possible conflict of interest, to his/her senior. The management may require the employee to dissociate him/her from any involvement in a decision by the Company that relates to such personal conflict.
7. Our involvement in an outside activity or any external position held must not give rise to any real or apparent conflict with the customer's interest, must not adversely reflect on the Company and must not interfere with an individual's performance.
8. We will not solicit or accept gifts, sponsorship; hospitality or favor which would compromise, or give the appearance of compromising our position or any business decision taken by or on behalf of the Company. Accepting gifts and entertainment can cause a conflict of interest, or the appearance of a conflict between personal interests and professional responsibility. The Company's culture is to never accept gifts or entertainment from any supplier, potential supplier, or any person the employee has reason to believe may be seeking to influence business decisions or transactions.
9. We, besides, working with honesty and faithfulness shall maintain strict secrecy regarding the Company's affairs and the affairs of its constituents and subsidiaries, if any. We shall use utmost endeavors to promote the interest of the Company and shall show courtesy and attention in all dealings with customers.
10. We shall not use for personal gain or benefit or, except insofar as it is necessary in the regular course of business, disclose to anyone within or outside the Company any information obtained in the course of work that is of confidential nature. We will not disclose intentionally or carelessly, any information that is of confidential nature without the prior approval from the respective departmental head. In official communication with prospective communication with prospective or current client, ensure that information is given only on need to know basis.
11. We shall devote our time and energies to serve the interest of the Company and not engage in any other profession, trade or business activity for remuneration or enter into the employment of any other person firm or company or assist in any other business owned by his or her spouse or parents or siblings without prior written consent of the Senior Management/CEO. An engagement in social and welfare service beyond normal office hours may however, be encouraged.
12. We shall not make any false or misleading statement in relation to our appointment or performance of our duties in the Company. To ensure accuracy of information that would be provided to the public, the employees are prohibited from making any statement, including statements about financial matters (written or verbal) on behalf of the Company to media, news publications, business publications, or any other source without prior approval from the competent authority of the Company.
13. We shall not bring or attempt to bring political or other influence, directly or indirectly, nor shall we take part in, subscribe to and or assist in any way, any political activity.



14. If we are found involved or convicted in a criminal offence, we shall immediately bring to the notice of the management through our head of department or, if arrested and released on bail, soon after such release.
15. In case, if I hold a business interest directly or indirectly which conflicts or may conflict with the Company's vested interests, I must declare in advance that interest to the appropriate internal authority, where deemed necessary and appropriate, I may be required to disassociate myself from any involvement in a decision by the Company that relates or provokes such personal conflict.
16. Personal, social and unofficial visits during working hours are discouraged. In the event of any emergency, visitors may be entertained outside the work area, or the designated reception area to ensure confidentiality of information and minimum disruption.
17. We shall not lend or borrow money or place ourselves under any pecuniary obligation to any person(s) whom they have any official dealings except for dealings occur during ordinary course of business.
18. We shall not propagate partiality or favoritism which may affect our integrity in the discharge of duties or to embarrass the management by creating feelings of discontent amongst other employees of the Company. We shall not indulge in parochialism, favoritism, victimization and abuse of office.
19. We shall generally dissuade from following evils:
 - Inappropriate conduct
 - Gender harassment
 - Corruption and Retaliation
 - Discriminatory behavior
 - Grapevine and Gossips
 - Intentional dishonesty
 - Drug abuse and anti environmental activities
 - Insider trading
 - Money laundering

Final Disclaimer

We agree and understand that this Statement of Ethics and Business Practices provides an introduction to the responsibilities of all employees, along with an overview of certain important policies. It is an important part of our employment with **Sindh Leasing Company Limited** but it's not intended to create an express or implied contract of employment in and of itself. The policies of **Sindh Leasing Company Limited** may be modified at the sole discretion of management, without notice, at any time consistent with applicable laws. Employment with **Sindh Leasing Company Limited** is on an at-will basis, where permitted by law, meaning the employees are free to resign at any time for any or for no reason and the Company may terminate an employee at any time for any or no reason.

Violations of these Statements of Ethics may result in disciplinary action up to and including Termination of employment.

