

# 1. Business Code of Conduct

## Scope and Applicability

“Code of conduct” is a statement and description of required behaviors, responsibilities, and actions expected from employees of an organization

1. IGNITE Code of Conduct focuses on professional, legal, ethical and social behaviors and is applicable to all employees (including interns and trainees) as individuals and as part of IGNITE, in their social or work life, providing guidance on how to act in cases of doubt or confusion.
2. This Code of conduct is not exhaustive and may not anticipate every situation which may morally, ethically, professionally, legally compromise the employee or IGNITE interests. In this regard, IGNITE expects its employees to use their ethical decision making and sound judgement. However, compliance with this Code is a mandatory obligation owed by all employees to each other and to IGNITE. Breach of this code or any requirements mentioned in these rules may result in a disciplinary action and may lead to employee dismissal or other appropriate disciplinary actions deemed necessary by IGNITE.
3. This Code of conduct provides firm, uncompromising standards for each employee in their dealings with each other, customers, suppliers and contractors and/or other stakeholders. The code emphasizes and provides further guidance regarding policies which are an integral part of the IGNITE business philosophy.
4. IGNITE is committed upholding the highest standards of conduct in public. To meet this commitment, IGNITE has issued this Code of conduct that is applicable to all employees, across all departments and to align employee conduct with the organizational values and ethics that reinforce the IGNITE vision, mission, values, procedures and policies.
5. Every employee must conform to and abide by the applicable laws, rules and regulations and orders of the Organization, and shall observe, comply with and obey all lawful orders and directions which may be given to he/she, from time to time, by any person or persons under whose authority or supervision, he / she is working.
6. All IGNITE employees are liable to follow this code of conduct, irrespective of their age, gender, contract type or ethnic background and to perform their duties effectively and provide impartial and accurate advice and act in an open, transparent, equitable and inclusive manner that promotes a productive and harmonious working environment.

## Code of Conduct Policies

1. All employees of IGNITE are required to conduct their behavior within the decided behavioral standards as communicated to them from time to time. To

facilitate employees in maintaining a healthy and cooperative working environment, IGNITE provides different platforms and mechanisms to address and resolve any issues they may face.

2. This portion of the HR Manual provides details of all those policies and standards that are intended to provide guidelines and parameters based on which employees' behavior will be judged, aligned and reprimanded.
3. In order to effectively communicate these standards, it is the responsibility of the HR Department to provide a copy of the Declaration of Commitment (Refer to Annex: HRF 001-001) to all new joining employees and take their undertaking by getting it signed from them. Employees are required to provide their undertaking by signing the Declaration of Commitment (Refer to Annex: HRF 001-001) after carefully understanding their obligations and the IGNITE code of conduct mentioned in it. Employees must be in understanding of the fact that these policies are developed for all IGNITE employees Policies mentioned in this chapter are also applicable to the Board of Directors as well. In the light of the Code of Corporate Governance, BOD members are required to follow IGNITE COC and declare conflict of interest situations (if any) in writing to the Company Secretary before or during appointment as directors. BOD is generally liable to follow Conflict of interest, anti-corruption and anti-Harassment policies in addition to the code of conduct.

### **1.1. Equal Employee Opportunities**

IGNITE shall provide equal employment opportunities to qualified individuals regardless of race, color, ethnicity, caste, gender, origin, ancestry, religion, age, disability, or marital status in consistent with laws of the Islamic Republic of Pakistan.

### **1.2. Harassment at Work**

- Harassment of employees in the workplace based on characteristics protected by Pakistan law and/or including but not limited to sex, race, color, ethnicity, caste, ancestry, religion, age, disability or marital status is counter to the mission of IGNITE and such violations will be treated as disciplinary matters and/or provisions given in law of the land. It is IGNITE's policy to prohibit harassment of any kind of any of its employees by anyone, including any supervisor, co-worker, consultant, contractor, vendor, client or customer.

For the purposes of this policy, "workplace" also includes organization sponsored social events, work related travel or similar situations connected with employment.

- IGNITE takes allegations of harassment seriously, responds promptly to

complaints and does not tolerate retaliation against individuals alleging or cooperating with an investigation of harassment. IGNITE acts promptly to eliminate any improper conduct and imposes corrective actions as necessary including but not limited to termination of employees responsible for such acts and severing relationships with consultants, vendors, clients or customers if required, where an inappropriate conduct is determined or proved on an immediate basis.

- IGNITE complies fully with the “Protection against Harassment of Women at Workplace Act, 2010”. As per Clause 1 of this act, Sexual Harassment is defined as any unwelcome sexual advance, request for sexual favors or other verbal or written communication or physical conduct of a sexual nature or sexually demeaning attitudes, causing interference with work performance or creating an intimidating, hostile or offensive work environment, or the attempt to punish the complainant for refusal to comply to such a request or is made a condition for employment, is unacceptable behavior in the workplace, including any interaction or situation that is linked to official work or official activity outside the office. All such acts are a violation of this Act and IGNITE policies.
- IGNITE will constitute an anti-harassment committee led by the most Senior female employee along with 02 other employees to ensure compliance of “Protection against Harassment of Women at Workplace Act, 2010”.
- IGNITE’s policies prohibit any behavior on the part of an IGNITE employees which constitutes any form of sexual misconduct, including sexual harassment, sexual exploitation and sexual violence towards any other staff member, consultants, contractors, interns or other individuals participating in IGNITE’s business activities in a professional capacity. Retaliation for reports of sexual misconduct is strictly prohibited and will not be tolerated under any circumstances. Sexual misconduct and/or retaliation of any kind will result in immediate termination of employment. For the purposes of this policy, IGNITE employees, BOD members, outsourced employees and or any individual related to IGNITE in a business capacity or as a beneficiary of IGNITE work will be treated as IGNITE employees. IGNITE is committed to providing a work environment that is free of discrimination and unlawful harassment. Actions, words, jokes, or comments based on an individual’s sex, race ethnicity, age, religion, or any other legally protected characteristics that may be perceived as hurtful or offensive are not acceptable under any circumstances. As an example, sexual conduct (both overt and subtle) is a form of employee misconduct that is demeaning to another person, undermines the integrity of the employment relationship, and is strictly prohibited. Reporting methods and mechanisms and circumstances under which harassment cases are to be dealt with are explained

in detail under Disciplinary Policy of this manual.

### **1.3. Abuse and Violence**

IGNITE is committed to providing a safe work environment. Any form of violence, threats of violence, intimidation of others or attempts to instill fear in others will not be tolerated. The possession of a weapon in the workplace, or while conducting IGNITE's work, menacing behavior or "stalking" are all prohibited actions. Violations of this policy may lead to a fitting disciplinary action including termination of employment and the involvement of appropriate law enforcement authorities. Any person who exhibits such behavior may be removed from the work site for investigation purposes immediately. IGNITE will attempt to resolve the complaint within three weeks of time while preserving the confidentiality to report situations that may have a risk of violence. IGNITE requires all of its employees to abstain/refrain from any sort of child abuse which could be physical, sexual and emotional and in neglect forms. Child labor as per law is strictly prohibited.

### **1.4. Apolitical, Non-Sectarian Policy**

IGNITE is a non-sectarian, apolitical, section 42 compliant company without regard to sectarian or political considerations in areas where we work. It is, therefore, necessary for all IGNITE employees, both individually and collectively, to abstain from any activity that may be perceived as aligning them or IGNITE for or against a sectarian or political cause, issue or faction.

- Adherence to this policy is one of IGNITE's major strengths; it underpins much of our effectiveness and is a condition for assignment to any IGNITE position. Employees at all levels are required to comply with this policy in order to preserve and enhance this organization's reputation and effectiveness.
- Individuals may, of course, speak out as individuals on matters of personal concern, and this policy in no way abrogates that right. Care must be taken, however, to assure that such statements are neither made, nor are likely to be interpreted as being made, on behalf of IGNITE. For example, IGNITE stationery should never be used in making personal statement.
- In politically sensitive situations, employees must be acutely aware of how their words and actions impact those around them, as whatever they say or do, will very likely be interpreted as reflecting IGNITE position as a company. Each staff member must, therefore, exercise prudence, common sense and sensitivity in assessing each situation carefully before speaking out in sensitive situations.

### **1.5. Alcohol and Drugs Policy**

IGNITE maintains a working environment free from the harmful effects of alcohol

and drugs. In recognition of the serious consequences to IGNITE, all its employees are subject to the following:

- Any employee who unlawfully manufactures, distributes, dispenses, possesses, uses or is impaired by a controlled substance or who manufactures, distributes, dispenses, possesses, uses or is impaired by alcohol on the job, whether on or off IGNITE property, will be subject to discipline, including immediate termination. Strict compliance with this policy is a condition of employment.
- All employees, as a condition of employment, are required to notify HR or HOD of any criminal drug statute conviction for a violation involving a controlled substance, as per laws of Pakistan, occurring on the job no later than five (5) days after such conviction. IGNITE intends to vigorously enforce this Alcohol and Drug Abuse Policy. IGNITE reserves the sole right to conduct a drug test of any employee suspected of using violation of this policy.

### **1.6. No Smoking Policy**

No smoking or other use of tobacco products (including, but not limited to, cigarettes, pipes, cigars, snuff, or chewing tobacco) is permitted in any part of the building or in vehicles owned, leased, or rented by the Company. Employees may smoke outside in designated areas.

### **1.7. Conflict of Interest Policy**

IGNITE policy requires that each employee be free of any personal interest that could influence his or her judgment or action in the conduct of organizational business or affect his or her responsibility to IGNITE as an employee. An employee must not only avoid situations that give rise or could give rise to a conflict of interest, but also situations that create the appearance of a conflict of interest.

This policy is not intended to detail every situation that could give rise to a conflict of interest. A person with ordinary good judgment should know whether or not a particular activity involves an actual or potential conflict. Wherever there is any doubt, the matter should be brought to the attention of the HR Department who will take action as appropriate.

No employee may serve as a director, officer, employee, partner, consultant, agent or representative of an organization not affiliated with IGNITE if the potential for a conflict of interest exists.

#### **Involvement with Other Organizations**

No employee or their family members may get involved, directly or indirectly, with any business organization which does or seeks to do business with IGNITE, unless the

interest or obligation has been fully disclosed in writing to the employee's Line Manager, HR Department and CEO. A "family member", for purposes of this policy, includes a close relative (by blood or marriage), as per the family definition mentioned in Para 9.4.6 of HR Manual.

Any financial or business interest in, involvement with or loan from an organization that might influence the judgment or action of an employee in the conduct of IGNITE activities will be considered "significant". A loan from a financial institution at prevailing interest rates and on commercial terms may be disregarded if otherwise restricted by prudential regulations or any other regulation prevailing in the country.

### **Outside Work**

A conflict of interest may also exist when an employee engages in an independent business venture or performs work or services for another organization to the extent that the activity prevents the employee from devoting the time and effort to the Organization, required by his or her position. The written approval of the CEO/HR Governance Committee must be obtained in the case of all full-time employees in such situations.

### **Resolving Questionable Situations**

Any employee who is, or thinks he/she may be, confronted with a conflict of interest situation should immediately request a determination to HR department through Line Manager, Head of Department, CEO as to whether, based on full disclosure and consideration of all relevant facts and circumstances, such a situation in fact exists, and if so, what steps should be taken to correct or avoid the situation.

### **Gift and Entertainment**

- No employee or member of his family may accept, directly or indirectly, any gift, entertainment or favor from an individual, private or public organization that stand to benefit from an action of IGNITE except for promotional-type gifts and entertainment, meals and social invitations that are in keeping with good business ethics and that obligate neither the recipient nor IGNITE in any way. For example, if a vendor offers free or reduced services or goods to an employee or to a member of an employee's family in exchange for a contract with IGNITE, this is considered a conflict of interest and must be immediately reported to the HR Department and such gifts should be deposited in HR Department.
- Payment of commercial transportation, hotel room or other living and traveling expenses must not be accepted or permitted, except when travel and participation are a part of a group hosted by a supplier or customer representative, is business related and is promptly reported to management.
- No employee or member of his/her family may accept directly or indirectly any gift



neither in kind nor in cash, from a current or potential IGNITE beneficiary. An ordinary meal is acceptable only when it is customary and obligates neither the recipient nor IGNITE.

- It is never permissible to accept a gift in cash, cash equivalents or securities of any amount. If there is any doubt as to whether it is proper or not proper to accept a gift, travel, entertainment, etc., HR Department of IGNITE should be consulted.

### **Misuse of Proprietary Information**

Information (e.g. future business plans, competitive bids, sponsorships, employee lists etc.) obtained as a result of employment that is not generally available to the public, may not be communicated to any individual(s) or organizations outside IGNITE till two years after the retirement from the services of IGNITE. For this purpose, employees of IGNITE are required to sign Declaration of Commitment (please refer to Annex: HRF 001-001).

### **Misappropriation of Business**

A conflict of interest may also exist when an employee, without the knowledge and consent of the IGNITE Management, appropriates to himself/herself, or to another person or organization, the benefit of an arrangement of a business venture, opportunity, or potential that the employee learns about or develops in the course of employment and which is related to any current or prospective undertaking of IGNITE.

## **1.8. Anti-Corruption and Anti-Bribery Policy**

This policy is an extension of the Conflict of Interest policy mentioned above and defines IGNITE's policy on the avoidance of bribery and corruption. It has the endorsement of the IGNITE Board of Directors and will be regularly reviewed by the Board to ensure that it reflects any changes in applicable laws and developments in acceptable standards for the conduct of business. IGNITE is committed to maintaining the highest ethical standards and vigorously enforces the integrity of its business practices wherever it operates. The company will not engage in bribery or corruption.

Adherence to the clear guidelines set out in this policy will ensure that the company and its employees comply with anti-bribery and anti-corruption laws and governmental guidance. The policy reflects the Board's wish to embed a culture of best practice in anti-bribery and anti-corruption measures and enforcement of the policy will reduce the risk that the company or any employee will incur any criminal liability or reputational damage. IGNITE employees are expected to use their judgment not just to avoid malpractice but to promote good practice. Examples and definition of terms mentioned in Anti-Corruption policy are not exhaustive and must be read in conjunction with Conflict of Interest as well as Disciplinary policies to arrive at best possible judgment on the case in hand.



## Definitions

- i. **Business integrity:** Business integrity involves the application of the company's core values. The opposite of integrity is dishonest behavior, including corruption that could undermine IGNITE's reputation for fair dealing.
- ii. **Bribery:** Bribery, in broad terms, is the receiving or offering of undue reward or anything of value and includes payments to secure a business advantage, financial or otherwise, to which the company is not entitled. Anything of value can be a bribe, including a gift in kind or some other favor such as an offer of employment to a relative of the person being bribed. It will involve the giver and the receiver in the improper performance of a personal, company or official responsibility.
- iii. **Corruption:** Corruption can include bribery, facilitation payments or other forms of improper business practice. It has the same attributes as set out under the definition of Bribery above. It can be summarized as the misuse of entrusted power or office, whether in the public or private sector, for personal gain.
- iv. **Kickbacks:** Kickbacks arise when suppliers or service providers pay part of their fees to the individuals who give them the contract or some other business advantage.
- v. **Facilitation Payments:** Facilitation payments are small bribes to officials with an intent to speed up the routine governmental transactions to which the payer is already entitled and such payments do not go to the Government treasury. Examples include payments to speed up customs clearances and extra fees to officials to secure electricity connections.

## Policy

- i. **Bribes and kickbacks:** IGNITE does not take part in acts of corruption, or pay bribes or receive kickbacks either directly or indirectly. IGNITE prohibits its employees from engaging in acts of corruption, from paying bribes or kickbacks to or accepting bribes or kickbacks from public officials and private individuals such as the personnel of companies with which the company does business. A typical example of indirect bribery would be a case where a company employs a commercial agent to help it win a IGNITE contract. The agent is paid by commission based on a percentage of the contract fee, and part of that commission is passed on to a IGNITE official. IGNITE does not tolerate such practices in any form or wherever paid. It is the responsibility of all

employees who are involved at any time in engaging the services of external consultants, contractors, suppliers or advisers to ensure that such individuals are made aware of the content of the company's Anti-Bribery and Anti-Corruption policy at the outset of the relationship and on a regular basis thereafter.

- ii. **Facilitation payments:** IGNITE and its employees will not make facilitation payments even if such payments are a local practice or custom. The company accepts that refusal to make illicit payments may lead to commercial delays. For example, in the processing of government papers and that there may be a commercial cost to the company attributable to this policy. The company recognizes that demands for facilitation payments are often backed by a form of extortion and that, in exceptional circumstances, resistance may not be feasible. In such circumstances, IGNITE accepts that employees will need to use their best judgment. Employees must report any incident where they feel forced to make a facilitation payment to CEO/HRGC at the earliest opportunity. The company will stand by employees who find themselves placed in exceptional situations provided that the employee has provided absolute transparency as to the circumstances surrounding a payment shortly after the incident has occurred.
- iii. **Public officials:** Bribing or corrupting a public official is a serious offence, can carry severe penalties and can cause significant reputational damage. This policy provides detailed guidelines on gifts and hospitality. Approval must be secured in advance in relation to gifts or benefits received from or offered to public officials, particularly the giving of anything of value to a public official
- iv. **Charitable donations:** As part of its corporate citizenship activities, IGNITE may support local charities by making donations or providing sponsorships. Any such sponsorship/donations must be transparent and properly documented. IGNITE will only provide donations to organizations that serve a legitimate public purpose, and which are themselves subject to high standards of transparency and accountability. All such donations/sponsorships must fit into or have linkage with IGNITE CSR policy. Appropriate due diligence must be conducted on the proposed recipient charity and a full understanding obtained as to its bona fides.
- v. **Political activities:** IGNITE has a policy of strict political neutrality; it does not make donations to any political parties, organizations, or individuals engaged in politics. The company will co-operate with governments and other official bodies in the development of policy and legislation that may affect its legitimate business interests, or where it has specialist expertise.
- vi. **Business relationships:** IGNITE expects its business partners to approach issues of bribery and corruption in a manner that is consistent with the

principles set out in this policy. This requirement applies to agents, contractors, subcontractors and joint venture partners. In cases where IGNITE is unable to ensure these standards, it will reconsider the business relationship.

- vii. Agents, representatives and contractors:** This policy applies with particular force to commercial agents, representatives and contractors (Contractor also includes consultancy services in this policy). In many corruption cases, agents have passed on part of their commissions as bribes. The company prohibits such practices.
- viii.** In order to maintain the highest standards of integrity, employees must ensure that:
- They are fully briefed on the background and reputation for integrity of agents, representatives and contractors before hiring them. The company will conduct due diligence enquiries to review the integrity records of agents, representatives and subcontractors before entering a commercial relationship with them.
  - The engagement process is fully documented; and that final approval of the selection of agents, representatives and contractors is made by someone other than the person selecting or managing the company's relationship with them.
  - Agents, representatives and contractors are fully briefed on the company's Anti-Bribery and Anticorruption policy, and have made a formal commitment in writing to abide by it.
  - Fees and commissions agreed upon will be appropriate and justifiable remuneration for legitimate services rendered.
- ix. Once agreements have been signed,** IGNITE will continue to monitor its relationships with agents, representatives and contractors to ensure that there are no infringements of its Anti-Bribery and Anticorruption policy. Contractual agreements will include appropriate wording making it possible to withdraw from the relationship if agents, representatives or contractors fail to abide by this policy.
- x. Joint venture partners:** The need for documentation and careful reviews of the IGNITE's partners' integrity records applies equally to the process of setting up and managing joint ventures. IGNITE will use its influence to ensure that joint ventures meet high integrity standards. Where the IGNITE has majority control, it will ensure that the joint venture adopts the concepts and approach to bribery and corruption as set out in this policy.

- xi. Suppliers and contractors:** IGNITE will ensure that the procurement procedure for appointing suppliers and contractors is open, fair and transparent and as per Public Procurement Rules. The selection of contractors will be based on an evaluation of professional merit, and not on personal recommendations. IGNITE will communicate its Anti-Bribery and Anti-Corruption policy to its suppliers and contractors and it will expect them to abide by the principles set out in the policy when working on IGNITE's behalf. If these principles are breached, IGNITE will reserve the right to terminate the contract.
- **Training:**

IGNITE will make this policy available on the company's intranet or bulletin board. Necessary trainings and refreshers shall be conducted by the HR department at least once in a year for the existing employees.
- **Authority and Responsibility:**

CEO is the focal person with assistance from HR department to enforce this policy. HRGC or Director nominated by IGNITE BOD may investigate any suspected deviations or make clarifications in situations of doubt on how to respond to a case in hand. Any employee can use the Whistle Blowing Policy or Disciplinary/Grievance Policy in case of a suspected corruption or wrongdoing.

## 1.9. Protection of Public Interest

Protection of Public Interest Policy is an overarching policy, underpinning the code of conduct. Protection of public interest policy has to be read in conjunction with the Conflict of Interest, Anti-Corruption and Anti-Bribery and other COC policies. IGNITE, including its BOD believes in and promotes professional standards, corporate values and integrity among the board, senior management and other employees of IGNITE.

Protection of Public interest is based on fundamental principles of probity, propriety, objectivity, integrity and relationship with stakeholders. All employees and BOD members must have a clear understanding of this policy and consider its contents before making any official decisions.

This policy requires all individuals, teams and committees associated with IGNITE in any official capacity to ensure that the company's assets and resources are not used for private advantage and due economy is exercised so as to reduce wastage. This shall be followed while handling of public funds, assets, resources

and confidential information by directors and employees or claiming expenses.

Objectivity, integrity and honesty requires from the directors and employees of IGNITE to not allow a conflict of interest undermine their objectivity in any of their activities, both professional and private and that they do not use their position in IGNITE to further their private gains in a social or business relationship outside IGNITE. If a situation arises where an actual or potential conflict of interest exists, there shall be appropriate identification, disclosure and management of such conflict of interest, the details of which have been explained in conflict of interest policy.

IGNITE Company Secretary shall ensure that a “register of interests” is maintained to record all relevant personal, financial and business interests of directors and employees who have any decision-making role in the company and the same shall be made publicly available. Such interests may include, for instance, any significant political activity, including office holding, elected positions, public appearances and candidature for election undertaken in the last five years. A declaration by the directors and employees is needed stating that they shall not offer or accept any payment, bribe, favor or inducement which might influence or appear to influence their decisions and actions.

It is the mutual responsibility of Directors and all employees to uphold the reputation of IGNITE by treating the general public, governmental, institutional and other stakeholders with courtesy, integrity and efficiency and ensure service quality.

This also requires ensuring equality of opportunity by establishing open and fair procedures for making appointments and for determining terms and conditions of service. Compliance with the law and IGNITE's internal rules and procedures relating to public procurement, tender regulations, purchasing and technical standards is mandatory when dealing with suppliers of goods and services.

IGNITE management and its BOD shall also formulate significant policies which may include the following, namely:

The implementation of an effective communication policy with all the stakeholders of the Public Sector Company;

The identification and monitoring of the principal risks and opportunities for IGNITE as a company, if any, ensuring that appropriate systems are in place to manage these risks and opportunities, including, safeguarding the public

reputation of the Public Sector Company;

- Procurement of goods and services so as to enhance transparency in procurement transactions;
- Write-off of bad or doubtful debts, advances and receivables; acquisition or disposal of fixed assets and investments.
- Corporate social responsibility initiatives including donations, charities, contributions and other payments of a similar nature.
- Determination and delegation of financial powers to employees and employees.

### **1.10. Whistle Blowing Policy**

IGNITE's whistle blowing policy provides an internal procedure to resolve work - related issues fairly. The work problems may be related to situations where an employee feels that established organizational policies and practices have been violated or have not been consistently applied or to other matters of serious concern to employees. This whistle blowing policy is only exercisable when it is established that the Grievance Policy is not appropriate to follow.

It is also recognized, however, that situations may arise in which the staff member does not wish to go to the Line Manager. In these cases, the staff member may arrange to discuss the problem with the Head of Department or HR. If employees are not satisfied with the resolution of their issue, they always have the option of addressing their concerns with the CEO. In case if the situation warrants not to involve the CEO, then the matter can be taken in confidence with HR Committee or Director nominated for the purpose by BOD. It is very important that staff members be assured that no matter whom they consult, their standing in the Organization will not be jeopardized and Line Managers will not retaliate against the employee for utilizing the Whistle Blowing Procedure. No anonymous applications can be entertained and allegations proven with intentions to disrepute or otherwise will be subject to disciplinary action if necessary.

The HR Department plays an important role in ensuring that the process works. In addition to helping staff members resolve their work-related issues, HR, when made aware of situations in which the process was not effective, will counsel and advise those concerned to make sure the immediate issue is resolved satisfactorily and that similar situations do not arise in the future. Deliberately making a false concern is also an allegation under this policy and may lead to a disciplinary action against complainant. HR Department to ensure the safety,

secrecy and security of the whistle blower under the act ***'Whistleblower Protection and Vigilance Commission Act, 2019'***

### **1.11. Social Media Usage Policy**

Whenever you are permitted to use social media in accordance with this policy, you must adhere to the following general rules. The same rules would also apply when using social media outside of work:

- I. Do not post or forward a link to any abusive, discriminatory, harassing, derogatory, defamatory or inappropriate content.
- II. A member of staff who feels that they have been harassed or bullied, or are offended by material posted by a colleague onto a social media website should inform HR Department.
- III. Never disclose commercially sensitive, anti-competitive, private or confidential information. If you are unsure whether the information you wish to share falls within one of these categories, you should discuss this with your Line Manager/Head of Department or HR Department.
- IV. Do not post material in breach of copyright or other intellectual property rights.
- V. Be honest and open, but be mindful of the impact your contribution might make to people's perceptions of the company.
- VI. You are personally responsible for content you publish – be aware that it will be public for many years.
- VII. When using social media for personal use, use a disclaimer, for example: 'The views expressed are my own and don't reflect the views of my employer'. Be aware though that even if you make it clear that your views on such topics do not represent those of the organization, your comments could still damage our reputation.
- VIII. You should avoid social media communications that might be misconstrued in a way that could damage our business reputation, even indirectly.
- IX. Do not post anything that your colleagues or our customers, clients, business partners, suppliers or vendors would find offensive, insulting, obscene and/or discriminatory.
  - If you have disclosed your affiliation as an employee of our organization, you must ensure that your profile and any content you post are consistent with the professional image you present to client and colleagues.



- Staff should be aware that any use of social media websites (whether or not accessed for work purposes) may be monitored and, where breaches of this policy are found, action may be taken under the company's Disciplinary Procedure.
- The company reserves the right to restrict or prevent access to certain social media websites if personal use is considered to be excessive. Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes.
- Misuse of social media websites can, in certain circumstances, constitute a criminal offence or otherwise give rise to a legal liability against you and the company.
- If you notice any use of social media by other members of staff in breach of this policy, please report it to HR Department.
- Where it is believed that an employee has failed to comply with this policy, they will face the company's disciplinary procedure. If the employee is found to have breached the policy, they will face a disciplinary penalty ranging from a verbal warning to dismissal.
- The penalty applied will depend on factors such as the seriousness of the breach; the nature of the posting; the impact it has had on the organization or the individual concerned; whether the comments cause problems given the employee's role; whether the employer can be identified by the postings; other mitigating factors such as the employee's disciplinary record etc. Remember, the same test of reasonableness applies when dismissing for improper use of social media as it would for any other misconduct dismissal.