

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.