

D. CODE OF CONDUCT

All employees will have the responsibility to comply with all the provisions of the Code of Conduct given below, however situations may arise that may not have been directly reflected here and WSSP management will have to deal the issues under these guidelines and applicable law of Pakistan.

Any violation to the code of conduct by an employee will be subject to disciplinary action covered in Section P of this Manual.

1. Equal Employment Opportunity Policy

WSSP aims to provide equal employment opportunities to qualified individuals regardless of race, color, ethnicity, caste, gender, national, origin, ancestry, religion, age, disability or marital status and in compliance with all applicable laws of the Islamic Republic of Pakistan.

This policy also applies to all terms and conditions of employment, including recruitment planning, recruitment process, hiring, placement, promotion, termination, transfers, leaves of absence, compensation, training and all other aspects of human resource management.

GM – HR, Admin & Procurement will be responsible to ensure the following:

- Equal opportunities shall be mentioned and provided to all where necessary and affirmative action's/inclusion approach shall be followed to create a balance;
- Monitoring of HR related actions to prevent discrimination from occurring or to detect it and eliminate it;
- Make efforts to broaden the pool of qualified candidates for job categories in which fewer women and minority group members are employed than are available in the workforce.
- Mark efforts to employ, advance in employment, and otherwise treat qualified disabled individuals without discrimination based upon their disability or status in all employment practices.
- Strongly encourage female and minority employees to participate career development activities.

Any complaints against discrimination in employment or other related matters will be forwarded to CEO for affirmative actions.

2. Workplace Harassment

Harassment” means any unwelcomed 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. It also includes harassment based on race, national or ethnic origin, color, religion, age, sex, marital status, family status, disability and pardoned conviction).

WSSP is committed to fostering a harassment free work place where all employees are treated with respect and dignity, therefore the any of the above is unacceptable behavior in the organization and at the workplace and treated as disciplinary matter and/or relevant provisions in the law of the land.

Harassment will include any interaction or situation that is linked to official work or official activity outside the office, WSSP sponsored social events and any other similar situation connected with employment.

It is WSSP's policy to prohibit harassment of any of its employees by anyone, including any supervisor, co-worker, vendor, client or customer. For the purposes of this policy.

WSSP take allegations of harassment seriously, respond promptly to complaints and do not tolerate retaliation against individuals alleging or cooperating with an investigation of harassment. Where it is determined that inappropriate conduct has occurred, WSSP will act promptly to eliminate the conduct and impose corrective action as necessary up to and including termination of employees responsible for such acts and sever relationships with vendors, clients or customers if required.

In case of a formal complaint by any employee, all parties to a harassment complaint are expected to respect the privacy and confidentiality of all other parties involved and to limit the discussion of a harassment complaint to those that need to know.

Wherever appropriate and possible, the parties to the harassment complaint will be offered mediation prior to proceeding with a harassment investigation. Mediation is voluntary and confidential. It is intended to assist the parties to arrive at a mutually acceptable resolution to the harassment complaint. The mediator will be a neutral person, agreed upon by both parties. The mediator will not be involved in investigating the complaint. Each party to the complaint has the right to be accompanied and assisted during mediation sessions by a person of their choosing. In case, mediation result is unacceptable to any of the parties, the matter shall be referred to severance committee of WSSP.

Complaints of Sexual Harassment against Women: As per Clause 1 f the Protection against harassment of women at workplace act 2010, sexual harassment is identified 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 at work place, 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 WSSP policies. WSSP policies prohibits any behavior on the part of a WSSP employee which constitutes any form of sexual misconduct, including sexual harassment, sexual exploitation, and sexual violence towards any other staff member, client, beneficiary, or other individual participating in a WSSP activity. Retaliation for reports of sexual misconduct is strictly prohibited and will not be tolerated; Sexual misconduct and/or retaliation of any kind will result in termination of employment. For the purposes of this policy, WSSP employees include regular, deputed & contractual employees, volunteers, interns' consultants, experts, field staff or temporary contractors. WSSP 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 are not acceptable. 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.

All workplace harassment complaints including complaints of sexual harassment against women will be reported to the Severance Committee who will investigate the matter as per procedure explained in Section P of this Manual. Severance Committee may impose minor penalties including censure,

warning, and stoppage of pay or major penalties including reduction to lower posts, removal from service, dismissal from service may be imposed depending on the severity of complaint and provisions of applicable laws of the land.

3. Policy against Fiscal Improprieties

WSSP expects its entire employees to maintain the highest standards of ethical conduct and to ensure their and WSSP's compliance with all applicable laws and accounting principles. Any accounting fraud or other fiscal impropriety is strictly prohibited. Some examples of fiscal improprieties include:

- Unauthorized or unethical use of WSSP funds;
- Fraudulent accounting or reporting of expenditures;
- Illegal or unethical fiscal activity (e.g., theft, embezzlement, etc.);
- Improperly gaining or potentially gaining financial benefit from beneficiaries; and/or
- Aiding and abetting another's fiscal impropriety.

A willful failure to report a fiscal impropriety may be construed as aiding and abetting the wrongdoer. In addition to disciplinary action and/or termination of employment, fiscal impropriety may result in personal liabilities to the wrongdoer and criminal prosecution.

4. Conflict of Interest

WSSP's policy requires that each employee be free of any personal interest that could influence his or her judgment or action in the conduct of his services or affect his or her responsibility to WSSP. 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.

Employees are not allowed to represent or have any agreement with or obligations to anyone or anything that would in any way conflict with any of their obligations contained in any part of the "General Terms of Employment"

Employees must also understand and agree to disclose in writing to WSSP's Human Resources Department any apparent conflict of interest, either when they begin employment or at the time that a conflict becomes known or suspected, whichever is sooner. Some examples of situations and circumstances resulting in conflict of interest are:

- A marital or direct birth relationship with a bidder, its legal counsel or its officers;
- During the last three years, the member/ employee has been an employee or officer of the bidder or held a financial interest in a bidder;
- The member/ employee is negotiating or has an arrangement concerning prospective employment with the bidder;
- The member/ employee is executing or has executed a venture, to the benefit of the member/ employee and the bidder.

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. Where there is a doubt, the matter should be brought to the attention of the CEO or BOD as appropriate who will take actions accordingly.

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

- It is likely that the performance of a person's duties as employee or governing body member could be prejudicially influenced by that person's other interests (private, personal or professional), or that a reasonable person would believe that the person could be so influenced; or
- A person's participation as an employee or a governing body member of WSSP could be prejudicially influenced by the interests of organization that the person is representing, or that a reasonable person would believe that the person could be so influenced.

4.1. Involvement with other Organizations

All employees and governing body members must declare in advance, any relationship with persons, firms or companies, which have dealings with WSSP. They must also declare in advance if: a) they are directors or partners in a firm or company, which propose to have any dealing with WSSP; b) if their immediate family members (spouse, parent, child, brother and sister) hold directorship or partnership in organizations, which propose to have any dealing with WSSP and c) if to their knowledge, a member of their immediate family has any financial interest in any matter being considered by WSSP. Individuals who fail to make declaration of a conflict of interests as explained above are liable to account to WSSP for any profit made or benefit received from or in respect of the failure or violation.

No employee or their family member may have, directly or indirectly, a significant financial/employment or other interest in, involvement with or obligation to, any organization which does or seeks to do business with WSSP, unless the interest or obligation has been fully disclosed in writing to the employee's line manager, CEO or Board and it has been determined that the employee's duties for WSSP will not require him to make decisions or take actions that could be influenced by such interest, involvement or obligation. A "family member", for purposes of this policy, includes a close relative (by blood or marriage) and also any person living in the same household with the employee.

4.2 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. In such cases, the written approval either of CEO or Board must be obtained in the case of all full-time employees in such situations.

4.3 Gifts and Entertainment

No employee or member of his/her 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 WSSP

except for promotional materials type gifts and entertainment, meals and social invitations that are in keeping with good working ethics and that obligate neither the recipient nor WSSP. 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 WSSP, this is considered a conflict of interest and must be immediately reported.

Payment of personal/official transportation, hotel room or other living and traveling expenses must not be accepted or permitted, except when travel and participation are as part of a group hosted by a supplier or customer representative, is work 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 WSSP beneficiary. An ordinary meal is acceptable only when it is customary and obligates neither the recipient nor WSSP. If there is any doubt as to whether it is proper or not proper to accept a gift, travel, entertainment, etc., respective line manager should be consulted.

4.4 Misuse of Proprietary Information

Information (e.g. future plans, competitive bids/proposal for funding, 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 WSSP till two years after retirement/separation from the services of WSSP.

4.5. Misappropriation of Business

A conflict of interest may also exist when an employee, without the knowledge and consent of WSSP management, appropriates to himself or 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 that is related to any current or prospective undertaking of WSSP.

4.6. Resolving Questionable Situations

Any employee who is, or thinks he may be, confronted with a conflict of interest situation should immediately request a determination from HR Department and /or 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.

The above circumstances are examples of the probable conflict of interest situations only. Circumstances shall be evaluated at the time of each individual situation and appropriate disposal of measures shall be undertaken to ensure that Conflict of Interest situations are appropriately addressed.

A process for the recording and resolution of conflict of interest declarations shall be maintained by a member of the Procurement Committee. Records must include details of the actions taken to manage the conflict of interest.

A member/ employee having a conflict of interest shall be excluded from the procurement process to ensure transparency and integrity.

5. Code of Ethics and Business Conduct Policy

As representatives of WSSP, all employees must conduct all WSSP related activities honestly, with integrity and in the best interest of the entity, regions and communities WSSP serves. Employees are expected to demonstrate a standard of conduct that upholds the reputation of WSSP and is respectful of the rights of others and the standards of the communities in which WSSP works. Employees must act in conformity with applicable laws, regulations and standards common to employees of other charitable organizations, nonprofit corporations, non-governmental agencies and governmental agencies.

6. Use of WSSP Property

The services, goods, materials, technology and equipment provided to WSSP employees are all the property of WSSP. As such, the services, goods, materials, technology and equipment provided are to be used primarily for business-related purposes. This includes access to various forms of electronic media and services and communications services: computers, e-mail, telephones, fax/copy machines, networks, and the internet. Incidental and occasional personal use of the services, goods, materials, technology and equipment provided by WSSP does not violate this policy, so long as, such use does not interfere with the employee's job performance or violate this or any other WSSP policies.

Employees using WSSP's electronic communication systems for personal communications should not imply, directly or indirectly, that it is an official communication of WSSP. For further details regarding use of the electronic communication systems, please see the prohibited uses provision explained in section 8 below. Since not all of our technology and equipment is "secure" from third party interception, employees should use sufficient care when transmitting WSSP's confidential and/or proprietary information via insecure electronic systems. No employee may conduct a business or engage in unlawful or prohibited activities using services, goods, materials, technology and/or equipment provided by WSSP.

7. Prohibited Uses of WSSP Property

Employees will not use any services, goods, materials, technology and/or equipment provided by or paid for by WSSP for illegal, inappropriate, or otherwise disruptive activities, or in support of such activities. Listed below are some uses of the WSSP's computer systems and/or other telephonic or electronic communications systems that may, in the sole discretion of WSSP, result in a disciplinary action, up to and including termination.

- Creating, sending, receiving, storing or displaying any messages, images, documents or other materials that are unlawful (including violations of copyright and/or trademark laws);
- Creating, sending, receiving, storing or displaying any messages, images, documents or other materials that are offensive, or disruptive, including but not limited to, items that contain racial slurs, gender-specific comments, or other messages that offensively address someone's age, sexual implications, religious or political beliefs, national origin, or disability;

- Creating, sending, receiving or storing or displaying any type of offensive message, image or document;
- Transmitting or facilitating distribution of content that is untrue, threatening, harassing, abusive, racially or ethnically offensive, vulgar, defamatory, or objectionable;
- Attempting to "hack" into or otherwise breach security measures on any WSSP computer system and/or other telephonic or electronic communications system, or altering system software or hardware configurations;
- Attempting to gain access to other employees' e-mail, voice mail, or other electronic or telephonic communications without authorization;
- Conducting any unrelated business, including transmitting any unsolicited advertising, promotional materials, or any other forms of solicitation.

8. Protection of WSSP Property and Resources

It shall be ethical and professional duty of every employee to protect WSSP property and resources. WSSP employees/staff shall be prohibited from making any improper use of property such as funds, software, e-mail systems, voice mail systems, computer networks, vehicles and facilities for personal benefit or profit.

9. Smoke-Free Offices

Smoking is strictly prohibited in WSSP office buildings to designated areas. Nobody is allowed to smoke within the WSSP Office premises and working places such as seminar rooms, conference rooms and every hall, except designated smoking areas.

10. Nepotism

The employment of relatives in positions where they may be required to supervise and evaluate each other can cause significant conflicts of interest and poor morale. Accordingly, new employees shall be asked during the application process if they are related to any current WSSP employee. The HR Department will deal with such relationships on a case-by-case basis to assure that there is fairness to employees and to applicants and that there is no conflict of interest or appearance of impropriety.

11. Personal Information Policy

It is important for employees to keep their personnel records up-to-date for pay deductions, benefits and other matters. To ensure that personal data is current, it is each employee's responsibility to promptly update their personal information with the Human Resource Department within one month of a change. Personal information changes include:

- Legal name;
- Home address;
- Home and cell phone numbers;
- Emergency contact information;

- Marital status;
- Name and number of dependents;
- Beneficiary designation updates;
- Work permit, immigration, residency or citizenship status.

Disclosure of Personal Information

Any employee receiving any request for personal information of any nature about another employee, a former employee or an applicant for employment must refer the request to the HR Department. Employees are prohibited from disclosing or discussing any information concerning current or former employees or applicants for employment.

12. Absenteeism and Tardiness

All employees of WSSP are required to report to work as scheduled and on time and to leave work when their schedule workday is complete. Employees are responsible for notifying absences, late arrivals or early departures to their Line Manager and/or Human Resource Function on timely basis.

Failure to comply with the official work schedule may lead to disciplinary action against employees.

13. Dress Code

WSSP recognizes the cultural diversity amongst its employees and stresses the need for a shared dress code. Employees should maintain the highest possible professional image in terms of dressing and appearance at all times as well as comply with the appropriate standards of the dress code policy applicable in companies.

14. Injuries at Work Policy

If an employee sustains an injury while on the job, no matter how slight, a report shall be immediately made to the Departmental Head and to the Human Resource Function. In certain circumstances, an incident report may have to be completed.

15. Illegal Acts at Workplace

16.1. Weapons

In order to keep professional working environment at WSSP, no employee other than security guards shall be allowed to bring any kind of weapon at work place. Any violation to this rule shall be reported by any employee/staff member to relevant department head or zonal manager, who shall take appropriate steps in order to ensure compliance with this policy.

16.2. Violence

Workplace violence is any act or threat of physical violence, harassment, intimidation, or other threatening disruptive behavior that occurs at the work site. It has very negative impact on the working environment and reputation of a company. WSSP is committed to preventing workplace violence and to maintaining a safe work environment. All employees and company's associates should be treated with courtesy and respect at all times. Indirect or direct threats of violence, incidents of actual violence and suspicious individuals or activities should be reported as soon as possible to relevant department head and human resource function. Depending on the intensity of situation the matter may be referred to GM – HR, Admin & Procurement for necessary actions.

16.3. Use of Drugs

In order to keep professional working environment at WSSP office, drugs or any other health injurious things shall be strictly prohibited at the WSSP office. Manager – Admin other HR management personnel shall ensure that no employee/staff member uses drugs at any of WSSP office. Manager – HR & Admin may take disciplinary action against employee who violates the policy after reasonable warning.

16.4. Other

Any acts that are prohibited by any law of Pakistan shall be considered as “Other” illegal acts shall not be tolerated by WSSP. Immediate action shall be taken after assessment of the act.

16. Reporting Violations of the HR Policy

WSSP employees/staff has the responsibility to report any known, reported or suspected cases of alleged violations of these policies by WSSP employees/staff, any other humanitarian or development workers, representatives of local or national government, police, military personnel, outside contractors who are associated with WSSP, and/or all third parties doing business with the WSSP.

WSSP employees must report alleged violations immediately to Manager – Admin, who shall forward the case to GM – HR, Admin & Procurement immediately. Under no circumstances is any WSSP employee required to report the alleged violation to a supervisor whom he/she believes to be involved in the violation.

It is not the responsibility of the reporting employee to ascertain whether or not the complaint is true. It is his/her responsibility to report any concern in good faith.

When a report of an alleged violation is made, the GM - HR, Admin & Procurement will conduct a full, fair, prompt and thorough initial investigation as appropriate under the circumstances. In case GM – HR, Admin & Procurement establishes that the complaint is genuine, he/she will forward the complaint to Severance Committee for formal investigation and decision. For inquiry, investigation and decision making by the Severance Committee, please refer to Section P of this Manual.

Steps taken will depend upon the nature of the allegation. All WSSP employees/staff must cooperate fully in the course of any investigation. Confidentiality will be maintained throughout the investigation

subject to the need to conduct a full and fair investigation. If WSSP determines that a violation of these policies has occurred, prompt remedial action will be taken against the offending person(s), up to and including his/her termination from employment.

Additionally, if appropriate, WSSP management (i.e., General Manager HR) will alert the proper legal authorities as to the violation. All WSSP employees are expected to report instances of violations truthfully and responsibly. WSSP employee, who fails to report allegations that have been brought to their attention or to act on information that they know or should know, will be subject to disciplinary measures. Intentionally false reports of violations of these policies can result in termination from employment.

17. Bar to engage in other employment

The full time employee shall be at the disposal of WSSP and he/she may be employed by WSSP without claim for additional remuneration. No full time employee shall, except with the prior approval of the CEO in writing, engage in any trade, occupation and business.