

Tekcellent Private Limited

Corporate Social Responsibility Policy

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Prepared for:

Tekcellent Private Limited

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1- Introduction

Definitions

References to “Company,” “we” and “our” shall mean **Tekcellent Private Limited (TPL)**.

- 1.1 The Company seeks to be a good corporate citizen in everything that it does.
- 1.2 We have determined to bring together our existing operating principles into one policy under the heading of Corporate Social Responsibility (CSR). The principles encompassed in this policy cover all areas of our operations and have been developed and continue to be influenced by relevant codes of corporate governance and international standards including the United Nations (UN) Universal Declaration of Human Rights, the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the Guidelines for Multinational Enterprises established by the Company for Economic Cooperation and Development (OECD), the Rio Declaration on Environment and Development and the UN Convention against Corruption.
- 1.3 Our Management supports the principles set out in those codes and standards and the aim of this policy is to translate that support into a set of guidelines and standards that set a common approach for the Company and provide practical guidance for our managers and employees on the ground.

2- Compliance, monitoring and reporting

- i. Compliance with this policy will be continuously monitored and subject to review by the Management. Compliance will be communicated to all members in the organisation.
- ii. Each Supervisor is responsible for ensuring that the principles set out in this policy are communicated to, understood and observed by all employees and for ensuring compliance in their area of responsibility
- iii. Employees who reasonably suspect that there has been a breach of this policy must report it to their manager or through other mechanisms established by the Company to report such breaches. We recognise that employees may be reluctant to report concerns for fear of retaliation and will take disciplinary action against any employee who threatens or engages in retaliation, retribution or harassment of any person who has reported or is considering reporting a concern in good faith.
- iv. The Management will not criticise staff for any loss of business resulting from adherence to the principles set out in this policy. All sections of this policy are underpinned by the Company's Code of Business Ethics, which is set out in Section 3. The other areas covered by this policy are:

(Section 4):	Health and Safety,
(Section 5)	Security,
(Section 6)	Employment,
(Section 7)	Customer and Community, and
(Section 8)	Environment

3- Code of Business Ethics

1 General statement

This Code of Business Ethics sets out the standards we expect from our employees in their internal and external dealings with colleagues, customers, clients, stakeholders or third parties.

2 Basic Standards of Conduct

- i. We will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers, clients and third parties.
- ii. We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.
- iii. We will maintain the highest standards of integrity – for example, we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.

3 Employees

We are committed to:

- i. developing a workforce where there is mutual trust and respect, free from bullying and harassment, where every person feels responsible for the performance and reputation of our company;
- ii. respecting the rights of individuals their customs and traditions and their right to freedom of association. We will negotiate in good faith with our employees;
- iii. recruiting, employing and promoting employees on the basis of objective criteria and the qualifications and abilities needed for the job to be performed based on equal opportunity;
- iv. maintaining good communications with employees through our information and consultation procedures;
- v. providing our employees with suitable training and assisting them in realising their potential;
- vi. ensuring the privacy and confidentiality of our employees' personal information is respected;
- vii. suitably rewarding our employees for their contribution to the success of the business;
- viii. providing mechanisms whereby employees can raise legitimate concerns confidentially regarding malpractice and ensuring no one will be victimised for a report made in good faith;
- ix. providing employees with the appropriate information and training to comply with this Code and the associated policies; and
- x. seeking to protect our employees from third party abuse that might be injurious to their safety, health or well-being.

4 Business Integrity

- i. We aim to develop strong relationships with our suppliers, stakeholders and others with whom we have dealings, based on mutual trust, understanding and respect.
- ii. In those dealings, we expect those with whom we do business to adhere to business principles consistent with our own.
- iii. We will conduct our operations in accordance with the principles of fair competition and applicable regulations.
- iv. The Company's accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.
- v. We will comply with the laws and regulations applicable wherever we do business. We will obtain legal advice where felt necessary to comply with this commitment.
- vi. We will review and track our business risks including social and environmental risks.
- vii. The Company will not facilitate, support, tolerate or condone any form of money laundering.

5 National and International Trade

- i. We will seek to compete fairly and ethically within the framework of applicable competition and we will not prevent others from competing fairly with us.
- ii. We will comply with all applicable laws and sanctions when conducting business around the world.

6 Personal Conduct

- i. All employees are expected to behave in accordance with the principles set out in this Code of Business Ethics.
- ii. Employees are expected to protect and not misuse company assets such as buildings, vehicles, equipment, cash and procurement cards etc.
- iii. Employees are expected to use e-mail, internet, IT and telephones in a manner appropriate for business purposes in line with the principles contained in this Code.

7 Bribery

- i. No Company, employee or individual or business working with or on our behalf must accept or give a bribe, facilitation payment or other improper payment for any reason.
- ii. This applies to transactions with government officials, agencies, any private company or person anywhere in the world. It also applies whether the payment is made or received directly or through a third party.
- iii. The Company shall ensure that adequate procedures are in place to prevent the risk of bribery and that these are effectively communicated and implemented across the Company in line with the requirements set out in the Company Anti-Bribery & Corruption (ABC) and Child / Forced Labour (CFL) Policy.

8 Gifts, Entertainment and Improper Payments

- i. Accepting or giving any entertainment or gift that is designed to, or may be seen to influence business decisions, is not acceptable. No Company or employee shall offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her manager.
- ii. Any gift or hospitality given or received by an employee should be reported for inclusion on a Company List.

9 Conflicts of Interest

- i. Whilst we respect the privacy of our employees, all Company employees are expected to avoid personal relations, activities and financial interests which could conflict with their responsibilities to the Company.
- ii. Company employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.
- iii. All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) should be disclosed to and discussed with an employee's line manager.
- iv. Employees who have access to price sensitive information are prohibited from being involved in dealings in the Company securities unless given clearance by the Chief Executive or the Company Director. There should be no unauthorised disclosure of price sensitive information to staff or third parties.

10 Confidentiality

- i. Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.
- ii. Where confidential information is obtained in the course of business, that confidentiality must be respected.

11 Political Activity

The Company does not make any donations to political parties or take part in party politics. However, when dealing with Government we do make legitimate concerns known and will seek to influence Government in relation to issues that could affect us, our customers or the local community. These relationships are conducted in accordance with this Code.

4- Health and Safety

- i. We are committed to creating and maintaining a safe and healthy working environment for our employees, customers and the community.
- ii. Our commitment to ensuring the safety and security of our employees is set out in our HSSE Policy.
- iii. We strive to avoid emergency situations but recognise the need to be prepared. We are committed to having effective emergency response procedures in place.

1 The Environment

- i. The Company is committed to making continuous improvement in the management of its environment.
- ii. All employees are expected to adhere to the requirements of the local environmental management system and support the improvement in our environmental performance.

2 Customers

- i. The Company is committed to providing safe, value for money, high quality, consistent, accessible and reliable services to its customers.
- ii. All employees are expected to behave respectfully and honestly in all their dealings with customers and the general public in accordance with the principles set out in this Code.
- iii. In particular we will safeguard and protect the welfare of vulnerable people who come into contact with our employees. Employees will be made aware that they hold a position of trust and that they must at all times maintain the highest standards of personal conduct and integrity that reflects this trust being placed with them.

3 Shareholders

- i. The Company will conduct its operations in accordance with the principles of good corporate governance.
- ii. We will provide timely, regular and reliable information on the business as required.

4 Supply Chain

- i. We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on a number of key suppliers for the delivery of our core services. Good working relationships with our suppliers are therefore central to the success of our business.
- ii. Whilst we are committed to obtaining and retaining competitive goods and services we will at the same time seek to ensure they are from sources that have not jeopardised human rights, safety or the environment.

- iii. We expect our suppliers to adhere to business principles consistent with our own. We expect them to adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, and social and legal standards.
- iv. We will seek to work with our suppliers to develop long-term meaningful relationships to benefit both parties with the aim of improving the quality, environmental performance and sustainability of goods and services.

5 Community Involvement

Our operations touch members of the community daily, whether as customers, neighbours, employees, businesses or residents. We are committed to fostering good relationships with the communities in which we work and building community partnerships that deliver positive change.

5- Health, Safety, Security and Environmental Policy

1 Philosophy

All employees, sub-contractors, vendors and their employees should work professionally and ethically ensuring no harm is caused to themselves or their surroundings by using knowledge, technology and common sense.

2 Policy

The Company and its employees will:

- i. Operate a Health, Safety, Security and Environmental Management System that complies with all applicable legal and regulatory health, safety, security and environmental requirements.
- ii. Continually improve the health, safety, security and environmental, safety performance of our operations by establishing objectives, targets, supporting programs, monitoring, measuring and reviewing.
- iii. Encourage employee feedback on potential improvements and deficiencies in our health, safety, security and environmental business practices.
- iv. Wherever applicable use processes that are safe in their intended use, energy efficient, minimize adverse effects and can be disposed of safely.
- v. Store, handle and dispose of all potentially hazardous substances and wastes in a safe and proper manner.
- vi. Encourage reduction, reuse and recycling in all of our activities.
- vii. Encourage responsible use of resources throughout our business, including conserving energy, water use and improving energy efficiency.
- viii. Establish plans and implement related training of our employees to prevent health, safety, security and environmental incidents and handle emergencies.

3 **General Statement**

- i. Injury Prevention is our commitment to health and safety at the Company. It is our core value and part of our way of life and applies to everything we do. Its purpose is to ensure the health and safety of all our employees, our customers and others affected by our businesses.
- ii. We believe that:
 - a) all injuries are preventable; and
 - b) our goal is zero injuries.

4 Responsibility

Injury Prevention is the responsibility of every employee and working safely is a condition of employment. Company Directors and Management must ensure that all their staff are safe at all times by ensuring:

- (a) our Injury Prevention processes are properly organised and appropriately resourced;
- (b) staff are given information, instruction and training on risk assessment and Injury Prevention;
- (c) there is full compliance with Health and Safety laws and Company policies; and
- (d) performance targets are set for continual improvement in Injury Prevention.

5 Monitoring and reporting

We will monitor progress on Injury Prevention in all our operations and will conduct periodic audits to assess performance. In addition:

- (a) The Executive Safety Committee will receive and review a report at its monthly meetings.
- (b) All serious incidents will be reported promptly to our Directors and to the Management and reviewed for future Injury Prevention actions.

6 Injury Prevention Principles

6.1 Prevent injury to myself and to others.

Be aware of any hazardous condition or practice that may cause injury to people or damage to property or the environment.

6.2 Perform all necessary safety checks. Risk assess work area and the job before doing any work.

Asses the risks and mitigate these using hierarchy of controls. Speak to your supervisor before you start work if you are unsure.

6.3 Follow all safety procedures, signs and instructions.

If you do not understand, speak to your supervisor before you start work.

6.4 Keep work area clean and tidy at all times.

Untidy areas could cause injury to you or to your colleagues and waste time and energy.

6.5 Wear protective clothing and use equipment as required.

Keep clothing and equipment in good condition, wear it correctly and ask for a replacement if it becomes damaged or unfit for your use.

6.6 Use only the correct tools and equipment that I am authorised and trained to use for the job.

Check that all equipment is in good condition before use and use as per the Standard Operating Procedures.

6.7 Only adjust and repair any piece of work equipment if trained and authorised to do so.

Never modify any equipment which changes the designed use of the equipment.

6.8 Assess own capability to move any load before lifting.

Make sure you get help with any heavy or awkward items and follow the correct techniques.

6.9 Report all injuries, incidents, near misses, unsafe acts and unsafe behaviours to the supervisor.

Seek help immediately and first aid if necessary.

6.10 Tell the supervisor if there are any suggestions to prevent injuries in the workplace.

Use your Safety Passport to record and report and discuss this with your supervisor.

7 Security Policy

7.1 General Statement

7.1.1 Security is a key issue for our staff, our business, our clients and the general public. We recognise the range of security issues which can arise and have implemented the following high level security policy.

7.1.2 The Management is committed to ensuring, so far as is reasonably practicable, the security of our employees at work, the public and our property.

7.1.3 The threats to security are wide-ranging, significant and, in the main, driven by external influences. The ability to control risks varies. However, we have the ability to address or mitigate all of the threats we face. To be successful in this we need the co-operation and engagement of all of our staff and our passengers.

7.1.4 Security is an area in which we seek continuous development and improvement and compliance. We shall ensure all members of staff understand why they should and how they can play their part. Our cumulative efforts shall bring greater personal and corporate security and business benefit.

7.1.5 This statement provides guidance and direction to all employees on what is both required and expected of them. We are confident our staff will appreciate the reasons for this and the benefits to them, their colleagues, the public and our property.

7.1.6 The Directors and Management are committed to achieve, so far as is reasonably practicable:

- a secure environment for staff in their work;
- a secure environment for the client and public;
- security of our property; and

- security of our systems and processes.

7.1.7 We shall monitor our performance on security within our operations. All operations will be subject to periodic inspection and review.

7.1.8 The Company Safety Steward will provide regular reports on Company HSSE to the Directors.

8 Monitoring and Reporting

8.1 The Company recognises that this security policy needs to be supported by actions and processes to ensure delivery. The following measures are in place to assist this:

(a) A security strategy is in place, which underpins our policy, identifies the key strategic security issues for the business and the approach being taken to address these. This is designed to provide a structure, which allows measurement, review and ongoing refinement.

(b) The importance of security is emphasised to all staff through regular security briefings. This provides security advice and guidance to all personnel.

(c) This approach to security allows us to ensure we have a process to translate our policy into effective implementation within the business. It also allows us to formally recognise and demonstrate our commitment to the need for continuous development and improvement.

(d) We also require contractors to comply with this policy whilst they are working at our premises.

(e) We are committed to operate and provide services in a safe and secure way. Within this commitment it is recognised that, despite our best efforts and perhaps due to events beyond our control, an emergency situation may occur. In these circumstances it is appropriate that, however remote the possibility, the business is able to respond effectively if such a situation does arise.

(f) The Company has developed an emergency response procedure. Our approach is designed to prioritise the needs of our staff, our subcontractors, our clients and any members of the public who may become involved.

6- Employment

1 General Statement

In formulating its employment policies, the Company is guided by the framework established by the local laws and the OECD in its Guidelines. The Guidelines encourage companies to foster openness, sustainability and respect for employee rights. The policies set the standard for equal opportunities and diversity and cover all employees of the Company.

2 Equal Opportunities and Diversity Policy

2.1 The Company is committed to equality of opportunity both in the provision of services to its clients and as an employer. The purpose of this policy is to ensure that all employees, clients, contractors and those who come into contact with the Company are treated equally and with fairness and consistency at all times.

2.2 This policy seeks continuous improvement and compliance with legislation. It is based on the principles that:

- (a) all people have the right to be treated with dignity and respect;
- (b) we will not discriminate on the grounds of race, gender, disability, nationality, religion, philosophical belief, political belief, age, family status, or other such factors;
- (c) we will adopt fair and inclusive practices throughout our operations and will eliminate all prejudice, discrimination, bullying and harassment;
- (d) all employees have a personal responsibility for the practical application of this policy in their day-to-day activities and must support the policy at all times; and
- (f) non-compliance with this policy will be treated seriously and will not be tolerated.

2.3 The Company are tasked to ensure that it:

- (a) creates a productive and safe working environment, promoting diversity and inclusion in their workforce;
- (b) actively demonstrate the Company's diversity policy and practices;
- (c) develop new practices to ensure inclusion for employees, contractors and customers; and
- (d) demonstrate continuous improvement in diversity and equal opportunities for all.

3 Legislation and Codes of Practice

This policy conforms to the current local legislation and relevant codes of practice in the countries within which the Company operates. We will continually monitor this policy to ensure we are compliant with the requirements of relevant underpinning legislation; however our aim is to exceed the requirements of legislation wherever possible.

4 Partner Organisations

We are committed to actively working with partner organisations to ensure its policies, procedures and practices are inclusive for all.

5 Complaints

Any employee who feels that he or she has grounds for complaint in relation to bullying, discrimination, harassment or victimisation has the right to pursue the complaint through the Company's grievance procedure. Clients who feel they have grounds for complaint may also pursue these through the Management. The Company's complaints procedure must be accessible to all.

6 Practices and Standard Operating Procedures

Detailed practices and standard operating procedures which support this policy will be particular to the operation they support, and will at all times act in support of this policy.

7 Access to Vehicles

We will also take reasonable steps to ensure that as needed our vehicles are accessible to clients and staff and comply with the relevant legislation for the country in which they operate.

8 Access to Information

We will seek to ensure that information is made available to our customers and employees in alternative formats as required.

9 Recruitment

All recruitment will be carried out with regard to fairness, equality and consistency for all candidates at all times. Recruitment practices will be inclusive and any barriers to employment removed under the relevant legislation.

10 Staff Training

Guidance and training will be provided to all staff with regard to diversity awareness and equality to ensure we are both an inclusive employer and service provider.

11 Audit

We are committed to ensuring that our operations comply with the requirements of this policy. We aim to ensure compliance via regular audits and reviewing of action plans with the relevant managers and directors.

12 Human Rights

The Company supports the principles of the UN Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. We will adhere to the following principles in respect of our staff:

(a) We will treat all employees fairly and honestly, regardless of where they work. All staff will have agreed terms and conditions in accordance with local law or practice and will be given appropriate job skills training where required.

(b) We will pay a fair wage reflecting local markets and conditions. We will always meet any national minimum wage.

(c) Working hours shall not be excessive. They shall be function and activities based, and comply with industry guidelines and national standards where they exist.

(d) Employment must be freely chosen. We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour.

(e) Employees have the rights of freedom of association and collective bargaining. We respect the right of our employees without influence or interference from management.

(f) We will negotiate in good faith with our employees.

(g) We will abide by the non-discrimination laws in every country where we operate.

(h) We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.

(i) We have grievance procedures through which staff can raise personal and work-related issues.

(j) All staff will be given reasonable access to bathroom and rest facilities.

13 Data Protection

We will comply with the relevant principles governing data protection in each country in which we operate.

7- Customer and Community

1 Customers

1.1 Customer Service: Delivering our promise to our clients is one of our core values. Our commitment is to provide safe, reliable, customer focused, innovative and sustainable professional services.

1.2 We will:

(a) act in accordance with fair business, marketing and advertising practices and take all reasonable steps to ensure the safety of our services;

(b) respect the human rights of our clients;

(c) ensure our security and revenue protection arrangements are consistent with local and international standards for law enforcement as applicable;

(d) provide transparent and effective procedures that address customer complaints and contribute to fair and timely resolution of disputes without undue cost or burden;

(e) not make representations or omissions nor engage in any other practices that are deceptive, misleading, fraudulent or unfair; and

(f) respect customer privacy and provide protection for official and personal data in accordance with the relevant local law.

2 Stakeholders

We are committed to maintaining open and regular dialogue with all our stakeholder Companies in matters that affect their interests. These range from formal consultation to regular informal contact on an as required basis.

8- Environment

1 Environmental Policy

1.1 Through our core business activities we are committed to providing good quality, reliable and cost effective services to all of our clients. Our core business principles are:

- (a) We are a commercial organization – We need to be profitable
- (b) We are a “technology” company – We have to have technical currency and beyond
- (c) We have to be “top of the line” – We are either number 1 or 2 in the business or not in the business
- (d) We maximize staff potential – We groom and provide opportunity for employees to grow to their capabilities

1.2 The Company policy is to achieve continual improvement in environmental performance.

We are committed to:

- (a) maintaining an internal management structure for environmental issues which includes clearly defined responsibilities;
- (b) complying with, and where possible exceeding, applicable legal and other requirements relating to the organisation;
- (c) preventing pollution, minimising waste and reducing the overall impact of our operations on the environment;
- (d) monitoring our environmental performance and setting objectives and targets for improvement;
- (e) providing appropriate training and awareness programmes for our staff;
- (f) ensuring the most efficient use of energy and natural resources;
- (g) training employees and initiating behaviour-based change to cultivate a healthy and responsible attitude towards the environment, both at home and at work.