

Work place Anti-harassment Policy

1. Introduction

- a) Gender equality and women empowerment in the workplace are integral to the mandate of the Company. It is committed to progressive human resource (HR) practices that focus on diversity; gender equality, continuous improvement, innovation, and Employee growth. It provides an environment that is characterized by fairness, tolerance, diversity, compassion and resilience. It recruits, retains and develops a highly competent, diverse workforce that supports its mission, vision and values.
- b) The Company has zero tolerance for sexual harassment. All Employees, have a right to work in an environment free from unwelcome offensive or improper conduct or harassment.
- c) A code of conduct as laid down in “**Protection against Harassment of Women at Workplace Act 2010**” shall be part and parcel of these Rules. All Employees are expected to be fully aware of the 2010 Act supra and abide by the rules therein.

2. Scope:

The Policy covers all Employees, including senior management, Board of Directors (BOD), vendors, consultants, interns, trainees, visitors with whom the organization has any dealings.

3. Purpose:

Purpose of the policy is to create a work environment in the Company where both male and female Employees work together in a civilized and respectful manner with dignity and honor leading to improvement in the productivity of the Company. It is a Company objective to make the organization equitable as well as free from all kinds of discrimination based on gender, age, caste, ethnic background, place of origin, sect, religious beliefs, disability, medical condition and marital status.

4. Constitution of Inquiry Committee:

- 5.1 The standing Inquiry Committee (IC)/Anti-Harassment Committee will be responsible for receiving complaints of harassment or bullying, investigating such complaints, and recommending appropriate remediation.
- 5.2 Members of Inquiry Committee: The IC will consist of at least three members, of whom at least one member and preferably two members will be women. Two

members will be from the senior management and one from HR Department. The IC will determine a chairperson among themselves.

5. Inquiry Procedure

6.1 Informal Procedure

- 6.1.1** An informal approach to resolve a complaint of harassment will be through mediation between the parties involved and by providing advice and counseling on a strictly confidential basis. It is complainant discretion to take a complaint through informal channel. The complainant can launch a formal complaint at any time.
- 6.1.2** A complainant or a staff member designated by the complainant for the purpose can report an incident of harassment or bullying informally to the supervisor, or a member of the IC, in which case the supervisor or the IC member will address the issue at her/his discretion in the spirit of the Code of Conduct. The request can be made verbally or in writing.
- 6.1.3** If, the case is taken up for investigation at an informal level, a senior manager will conduct the investigation in a confidential manner. The alleged accused will be approached with the intention of resolving the matter in a confidential manner.
- 6.1.4** If, the incident or the case reported does constitute sexual harassment of a higher degree and the member reviewing the case feels that it needs to be pursued formally for a disciplinary action, with the consent of the complainant, the case can be taken as a formal complaint.
- 6.1.5** The IC member approached is obligated to initiate the process of investigation. The supervisor must facilitate the process and is obligated not to cover up or obstruct the inquiry. Assistance in the inquiry procedure can be sought from anyone within the scope of this policy who should be contacted to assist in such a case.
- 6.1.6** Any Employee, as a result of an enquiry report, found to have violated the policy might be subject to appropriate disciplinary action, which may include; suspension, relocation, demotion, confiscation of promotion, service, or increment(s), reassignment, or termination of employment.
- 6.1.7** Retaliation from either party will be strictly monitored. During the process of the investigation work, evaluation, daily duties, reporting structure and any parallel inquiries initiated must be strictly monitored to avoid any retaliation from either side.

6.2 Formal Inquiry Procedure

- 6.2.1 The process of investigation and recommendation must not exceed ten (10) working days after the registration of the complaint.
- 6.2.2 Appeal for review of the IC's decision could be sent to the MD & CEO (if, not the complainant or alleged bully, harasser) who is bound to respond within a period of five (5) working days.
- 6.2.3 All investigations of harassment or bullying claims will be conducted in a way that respects, to the extent possible, the privacy of all the persons involved is ensured.
- 6.2.4 Investigations will be conducted in a prompt, thorough and impartial manner.
- 6.2.5 The report of the investigation will be forwarded to the MD & CEO to make a final decision as to whether a violation of the policy has been substantiated.
- 6.2.6 Where harassment is found to have occurred, prompt and appropriate remedial action, to stop the harassment or bullying and deter its reoccurrence, will be taken.
- 6.2.7 The remedial action taken will include counseling, training, intervention, mediation, and/or the initiation of disciplinary action including termination of employment.
- 6.2.8 The HR department will maintain a written record of the harassment or bullying complaints received. The record will be maintained as confidential record to the extent practicable and appropriate.

7 False Accusations and Information

- 7.1 If any Employee knowingly makes a false accusation of unlawful discrimination/harassment or knowingly provides false information in the course of an investigation of a complaint will be dealt with breach of conduct and be grounded for strict disciplinary action. However, complaints made in good faith, even if found to be unsubstantiated, will not be considered as false accusation.

8 Confidentiality

- 8.1 All complaints and investigations will be handled, to the extent possible, in a manner that will protect the privacy and interests of those involved.
- 8.2 To the extent practical and appropriate under the circumstances, confidentiality will be maintained throughout the investigation process.
- 8.3 In the course of an investigation, it may be necessary to discuss the claims with the alleged harasser and other persons who may have relevant knowledge. If, therefore, may be necessary to disclose information to persons with a legitimate

need to know about the matter, prior consent of the complainant will be acquired.

- 8.4 All persons interviewed will be directed not to discuss any aspect of the investigation with others in light of the important privacy interests of all concerned. Failure to comply with this confidentiality directive may result in disciplinary action.

9 Disciplinary Action

- 9.1 Any Employee, as a result of an enquiry report, found to have violated the policy might be subject to appropriate disciplinary action, which may include; suspension, relocation, demotion, confiscation of promotion, service, or increment(s), reassignment, or termination of employment.

Grievance Policy

1. Introduction

The term Grievance relates to the dissatisfaction of Employees regarding any workplace related issue or matter that they may feel is unfair to them (whether the Employee is right or wrong) or any perceived or real violation of the terms of contract.

The management of GHPL is aware that each individual Employee has their personal habits, ethics, norms, attitudes, beliefs and expectations that may not always be compatible with the existing company rules, though it respects each individual's beliefs, expectations, ethics and norms. It also understands that in order to maintain uniformity and quality of work, the company must be fair in its treatment of Employees and must formally communicate rules, policies and expectations, in a timely and clear manner.

Conflict of Interest Policy

1. Introduction

Conflict of interest is a situation in which the concerns or aims of two different parties are incompatible.

2. Policy

- 2.1 GHPL policy requires that each Employee be free of any actual or potential personal interest that could influence his or her judgment or action in the conduct of organizational business or affect his or her responsibility and commitment to GHPL.
- 2.2 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 or semblance of a conflict of interest.
- 2.3 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.
- 2.4 Where there is doubt, the matter should be brought to the attention of the HR Department for their appropriate action. Accordingly, the occurrence of a conflict-of-interest situation will be interpreted in its broadest possible terms.
- 2.5 The following activities should not be undertaken by Employees including but not limited to: -
 - 2.5.1 Own directly or indirectly a beneficial interest in any enterprise that does business or is in competition with the Company except securities quoted on a recognized stock exchange or over-the-counter market,
 - 2.5.2 Engage in any outside activity which might interfere with the performance of his duties to the Company without written approval of the MD/ CEO
 - 2.5.3 Provide any service for remuneration or act as an Employee or agent of any enterprise that does business with the Company except with written approval of the MD/CEO.
 - 2.5.4 Engage in any activity which competes directly or indirectly with the Company.
 - 2.5.5 No Employee may serve as a director, officer, Employee, partner, consultant, agent or representative of an organization not affiliated with GHPL if any actual or potential conflict of interest exists.
 - 2.5.6 Conflicts of interest may arise from time to time in the course of such persons' activities and decisions, during their work for GHPL with regard to pecuniary or

financial interests, or interests that impede them in their duty to act in the best interests of the GHPL.

- 2.5.7 In case any vendor, client or customer are found guilty of employing child labor the working contract should be terminated with immediate effects.

3. Unauthorized communication of official documents or information

- 3.1 No Employee shall, except in accordance with any special or general order of the MD/CEO, communicate directly or indirectly any official documents or information to another Employee not authorized to receive it, or to a non-official person, or to the persons.
- 3.2 No Employee shall disclose any information to the media or answer any query made by them unless duly authorized by the MD/CEO.

4. Lending and Borrowing Money

- 4.1 No Employee shall lend money to, or borrow money from, or place himself under any pecuniary obligation to any person with whom he has any official dealings, provided that nothing in this behalf shall apply to authorized dealings under letter on behalf of the company in the ordinary course of business with a joint stock company, bank or a firm of standing.
- 4.2 When an Employee has borrowed money or has otherwise placed himself under pecuniary obligation in violation of above sub-rule, he shall forthwith, declare the circumstances to the MD/CEO.
- 4.3 Employees are discouraged to give or take loan from each other. The company shall not be liable if such loan is taken and any default occurs thereof.

5. Confidential Information

- 5.1 The petroleum industry places a great premium on creativity, upon invention and upon technological progress. It is an inviolable obligation of every Employee that the Company's trade secrets and confidential information are not leaked, released or otherwise disclosed to any unauthorized person or entity in any circumstances except upon specific instructions or orders of a Competent Authority and/or a court of competent jurisdiction.
- 5.2 The Company will restrict access to confidential information to those Employees who need it to perform their regular duties and will release it to others only upon prior approval by the MD & CEO and / or BOD.
- 5.3 The Company insists that all Employees having access to confidential information refrain from discussing it or disclosing it to those not required to know, breach of which shall tantamount to misconduct and hence dealt with accordingly. This

obligation shall survive even after the expiration or termination of the services of Employee from the Company and such Employee would indemnify the Company for all the losses arising out of any breach of confidentiality obligations provided in these Rules.

- 5.4 No Employee shall convey to any person (including a Co-Employee not directly connected with the work) in any manner or form or through any means any information about the Company which he is not otherwise permitted to do so officially in the normal course of his duties or under special instructions.
- 5.5 Breach of this Rule shall be treated as an act subversive of discipline and the Employee shall be liable to the punishment in accordance with these Rules.

6. Speculation and Investment

- 6.1 No Employee shall make, or permit any member of his family to make, any investment likely to embarrass or influence him in the discharge of his official duties.
- 6.2 No Employee shall make any investment the value of which is likely to be affected to some event by information which is available to him as an Employee and is not equally available to the general public.
- 6.3 If any question arises whether a security or an investment is of the nature referred to in any of the forgoing sub-rules, the decision of the MD & CEO shall be final.

7. Gift and Entertainment

- 7.1 No employee or member of his family may accept, directly or indirectly, any gift, entertainment or favor from an individual, private or public organization without prior approval of MD & CEO that stand to benefit from an action of GHPL 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 GHPL.
- 7.2 Payment of commercial 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 business related and is promptly reported to management.
- 7.3 No employee or member of his family may accept directly or indirectly any gift neither in kind nor in cash, from a current or potential GHPL beneficiary. An ordinary meal is acceptable only when it is customary and obligates neither the recipient nor GHPL.

- 7.4 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 GHPL should be consulted.
- 7.5 If any question arises whether receipt of a gift places an Employee under any form of official obligation to the donor, the decision of the MD/CEO shall be final.

Anti-Corruption and Anti-Bribery Policy

1. Introduction

This policy acts as guidelines for all Permanent and Contractual GHPL Employees to say no to corruption and fraud.

2. Policy

- 2.1 This policy is an extension of the Conflict-of-Interest policy that defines GHPL's policy on the avoidance of bribery and corruption. It has the endorsement of the GHPL BODs and will be regularly reviewed by the BODs to ensure that it reflects changes, if any, in applicable laws and developments in acceptable standards for the conduct of business. GHPL is committed to maintaining the highest principles of ethical standards and vigorously enforces the integrity of its business practices wherever it operates. GHPL does not and will not engage in bribery or corruption in any form or manner.
- 2.2 Adherence to the clear guidelines set out in this policy will ensure that GHPL and its Employees comply with anti-bribery and anti-corruption laws and governmental guidance.
- 2.3 The policy reflects the BOD'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 GHPL or any of its Employee will incur any criminal liability or reputational damage.
- 2.4 GHPL Employees are expected to use their judgment not just to avoid malpractice but to promote good practice. Examples and definitions of terms mentioned in the Anti-Corruption policy are not exhaustive and must be read in conjunction with the Conflict-of-Interest policy as well as Disciplinary policies to arrive on best possible judgment on the case in hand.
- 2.5 The policy establishes zero-tolerance for irregular practices by staff, consultants or individuals acting as representatives of GHPL. 'Zero tolerance' means that GHPL will pursue all allegations falling under the scope of its policy and that appropriate sanctions will be applied where the allegations are substantiated.
- 2.6 The Anti-Corruption policy establishes zero-tolerance for irregular practices in projects financed through GHPL loans and grants.
- 2.7 GHPL will enforce a range of disciplinary measures and sanctions for all substantiated cases, in accordance with applicable GHPL rules and regulations and contractual provisions, including referral to competent national authorities, if necessary. Where such cases concern individuals employed by another entity,

GHPL shall take all possible steps to ensure that the other entity takes appropriate actions in a manner consistent with its policy.

- 2.8 Under the anti-corruption policy, GHPL will continue to improve its internal controls so as to ensure that it is effective in preventing, detecting and investigating fraudulent, corrupt, collusive and coercive practices pertaining to its employees, consultants or its representatives.
- 2.9 It will take all possible actions to protect from reprisals the individuals who submit allegations of corrupt practices in its activities and operations, as well as from unfair or malicious allegations.
- 2.10 A holder of a public office, or any other person, is said to commit or to have committed the offence of corruption and corrupt practices: -
 - 2.10.1 If he accepts or obtains from any person or offers any gratification directly or indirectly, other than legal remuneration, as a motive or reward such as is specified in section 161 of the Pakistan Penal Code (Act XLV of 1860) for doing or forbearing to do any official act, or for showing or forbearing to show, in the exercise of his official functions, favor or disfavor to any person, or for rendering or attempting to render any service or disservice to any person; or
 - 2.10.2 If he accepts or obtains or offers any valuable thing without consideration, or for consideration which he knows to be inadequate, from any person whom he knows to have been, or likely to be, concerned in any proceeding or business transacted or about to be transacted by him, or having any connection with his official functions or from any person whom he knows to be interested in or related to the person so concerned; or
 - 2.10.3 If he dishonestly or fraudulently misappropriates or otherwise converts for his own use, or for the use of any other person, any property entrusted to him, or under his control, or willfully allows any other person to do so; or
 - 2.10.4 If he by corrupt, dishonest, or illegal means, obtains or seeks to obtain for himself, or for his spouse and/or dependents or any other person, any property, valuable thing, or pecuniary advantage; or
 - 2.10.5 If he or any of his dependents or benamidar owns, possesses, or has any right or title in any movable or immovable property or pecuniary resources disproportionate to his known sources of income, which he cannot reasonably account for; or
 - 2.10.6 Misuses his authority so as to gain any benefit or favor for himself or any other person, or to render or attempt to do so;
 - 2.10.7 If he has issued any directive, policy, or any SRO (Statutory Regulatory Order) or any other order which grants or enables any concession or benefit in any

taxation matter or law or otherwise so as to benefit himself or any relative or associate or a benamidar; or If he commits an offence of willful default.

Disciplinary Policy

The term Discipline relates to Employee conformity with formally established rules and regulations that govern the operations of the company. Each Employee should be familiar with these Rules. If an Employee is not sure of his responsibility to the Company they should consult with their immediate supervisor.

Alcohol and Drugs Policy

This policy aims to discourage use of Alcohol and Drugs policy. This policy ensures that such practices are severely discouraged.

Apolitical and Nonsectarian Policy

This policy ensures that the all such political/biased practices are severely discouraged.

Involvement with Other Organization

This policy ensures that all such biased practices are severely discouraged.

