

CODE OF CONDUCT

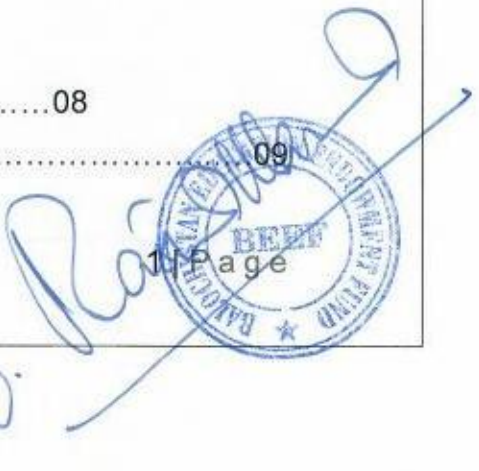
JUNE 2018

BALUCHISTAN EDUCATION ENDOWMENT FUND (BEEF)

A COMPANY REGISTERED UNDER SECTION 42 OF REPEALED COMPANIES
ORDINANCE 1984

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1. TITLE OF DOCUMENT:

This document will be titled as “ *Balochistan Education Endowment Fund Code of Conduct*”

2. APPLICABILITY:

This code will be applicable to all the staff members of BEEF that includes personnel who are part of BEEF's permanent payroll and persons associated with BEEF as volunteers, interns, Management Trainees, Consultants, temporary employees, field staff, project based staff or temporary contractors; herein after referred to as the “*Members*”,

This Code is not an all-inclusive comprehensive policy and cannot anticipate every situation that may arise in the course of BEEF's business. The members are expected to bear in mind the essence and substance of the Code and the Management Principles that are mentioned in this Code in all their dealings/ transactions with BEEF.

Chief Executive Officer reserve the rights to modify or amend these rules after intimating the competent authority whenever deemed necessary.

3. PURPOSE OF THIS CODE

This Code helps the members maintain good standards of business conduct, foster ethical, socially accepted moral conduct and promote a culture of honesty and accountability, so as to set an example for others in BEEF.

The objective of this Code of Conduct is to assert values, standards, rules and behavior that are desirable at Balochistan Education Endowment Fund (BEEF). The code will provide comprehensive guidelines to take decisions, procedures and systems to conduct business activities in a way to

(a) Contribute to the welfare of BEEF's key stakeholders

(b) Respect the rights of all constituents affected by BEEF's operations

4. BEEF'S MISSION, VISION AND MANAGEMENT PRINCIPLES

4.1 BEEF'S MISSION

“ To build a critical mass of Human Capital for their active participation in nation building, through provision of equitable opportunities to the academically brilliant boys and girls in Balochistan”

4.2 BEEF'S VISION

" Creation of a pool of talented youth of Balochistan including the less privileged section of society; contributing towards economic and social development to realize the dream of moderate, progressive and prosperous Pakistan"

4.3 BEEF'S MANAGEMENT PHILOSOPHY

4.3.1 Towards Business Operations

BEEF as non-profit oriented organization ensures sustained leadership and continuity of social value creation through identification of talented youth for awarding scholarship. It is BEEF's responsibility to provide all stakeholders with best services that offer value in terms of quality, sustainability and change. BEEF will work to manage stakeholder's expectations and to provide returns on their funding and efforts through identified youth development.

4.3.2 Towards Society

It is BEEF's responsibility to act in a socially responsible manner while supporting fundamental human rights and remain committed to follow all laws of Pakistan. BEEF will carryout its interventions in a manner that regard the social, health, safety and environment standards. BEEF will ensure prohibition to discrimination and biased of all kinds, harassment and child labour.

4.3.3 Towards Employees

BEEF will also create a professional working environment for employees that inspire commitment and performance. It will provide all the opportunities to employees for professional development to ensure nurturing of future leadership. In addition, BEEF will attract, hire and promote the best available talent that contribute to the success of its activities while creating fair, equating and performance-drive benefits and policies for them.

5. **PROFESSIONAL INTEGRITY**

BEEF believes in maintaining integrity and fairness in all aspects of its business activities and operations and upholds the following values in this aspect:

- BEEF is committed to work as a non-sectarian, apolitical and a non-profit oriented organization.
- All types of commercial transactions, where required, must be accurately, completely and timely recorded as per the requirements of law and Internal organization processes



- All types of commercial transactions must be processed and approved through the established level of authority
- BEEF strongly condemns and prohibits bribery, corruption and any other form of unethical business
- BEEF will contribute effectively in genuine social causes and also encourage its employees to play active role in community development matters – unless participation in these activities creates a conflict of interest
- BEEF will ensure documentation of all policies, their approval and implementation and will have documented internal audit to ensure mandatory compliance
- All necessary commercial information pertaining to BEEF performance will be shared in a factual, transparent and timely manner whenever deemed necessary or on need-to-know basis, internally or externally.
- BEEF will ensure compliance with all the applicable regulatory and statutory laws during execution of its operational and programmatic activities.
- BEEF will not enter and adopted zero tolerance policy against arrangement that involves practice of money laundering
- BEEF will not entertain nor make payments to institutions or their sponsored agencies that promote any form of political or religious bias.

6. BEEF'S RESPONSIBILITIES

6.1 COMPLIANCE AND OBSERVATION:

It is the responsibility of BEEF to ensure adherence of Code by members and affirm compliance with the code at the time of joining BEEF and on annual basis. Moreover, any violation against the Code may lead to disciplinary action as per BEEF's Disciplinary Policy.

In addition, all members must act within their required authority bestowed upon them and carryout informed, judicious and harmonious decisions and policies in the best interests of BEEF and stakeholders.

6.2 ACCOUNTABILITY AND REPORTING:

BEEF will maintain high standards and adopt mentioned rules/Code during execution of its different activities. In this regard, Compliance Officer may be appointed by BEEF to answer different queries from members pertaining to this code and ensure compliance with the Code. However, in absence of Compliance Officer this responsibility will rest with Human Resource (HR) department.



Compliance Officer /Human Resource (HR) to oversee BEEF's & Member's adherence to this Code or related ethical and legal standards. Compliance Officer/ HR will ensure and prevent any steps that may cause non-compliance with this code and could harm customers or reputation of BEEF. Similarly, such actions will be reported to CEO and if conditions required, to Donor Agency, as soon as any such event takes place so that corrective action may be taken in due course and see that such actions are not repeated.

6.3 POLICY OF BUSINESS RELATIONSHIP:

BEEF will carry out all its business operations legally and ethically. The quality, precision and efficiency are best tools of carrying out business of the Organization. BEEF will not tolerate unfair/unethical practices while conducting business operations. Therefore, it is expected that all members should uphold this standard of integrity in all business relationships.

6.4 COMPETITION POLICY:

BEEF will compete only in an ethical and legitimate manner. It prohibits all actions and practices that are anti-competitive or otherwise contrary to laws that govern competitive practices.

6.5 EQUAL EMPLOYMENT OPPURTUNITIES:

BEEF ensures to abide by its commitment to provide equal employment opportunities to its existing or new appointed employees without any kind of discrimination. This standard can be assured during its business operations where merit, job requirements and demonstrated performance will be the benchmark and no discrimination is made in the recruitment, retention, training, development, promotion of staff on the basis of gender, religion/belief, party, ancestry, marital status, political opinion, race, age, disability, socio-economic or cultural background, on the basis of having or not having dependents, or any other. Similarly, BEEF also make efforts to provide access to men and women staff members pertaining opportunities at all levels of the Organization. In order to achieve gender balance, encouragement will be made to women candidates where they are equally qualified as men to perform a job.

6.6 ELIMINATION OF CHILD LABOUR:

BEEF completely discourages Child Labour within Organization. Moreover, BEEF encourages its suppliers also towards a 'no child labour policy' in their business operations. Therefore, in order to support this cause BEEF will be hiring services of individuals who possess a verifiable document (CNIC) to prove they are at least 18 years of age; which is a legal age as per law of Pakistan to declare a person as an 'adult'.

6.7 ABOLITION OF FORCED LABOUR:

BEEF strongly condemns and discourages forced or compulsory labour. It is committed to ensuring that employees enter into employment and carry out their job responsibilities of their own free will.

6.8 HARASSMENT/SEXUAL HARASSMENT:

BEEF discourages all forms of harassment or inappropriate behaviors / actions leading to harassment of its Members, Vendors, Donors or Students during regular business operations at work place or at organization-sponsored social events, work related travel or similar situations connected with employment. It also includes actions, words, jokes, or comments based on an individual's sex, physical appearance, race, ethnicity, age, religion.

BEEF as Public Sector Company registered under section 42 of Repealed Companies Ordinance 1984 will fully comply with Protection against Harassment of Women at Workplace Act, 2010. In light of this act, following will be termed as Sexual Harassment in BEEF and may lead to serious consequences for the harasser including termination.

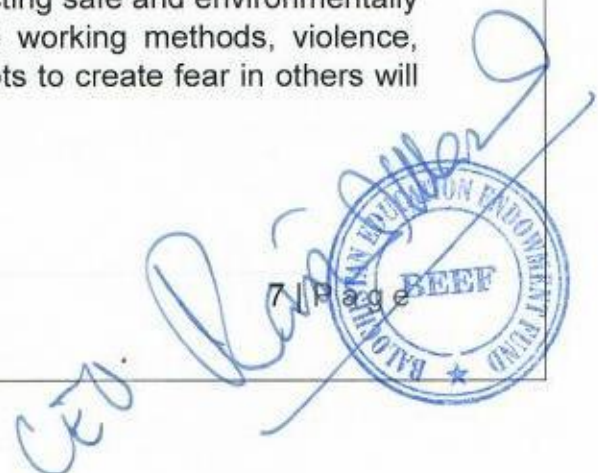
- (a) Any Sexual Misconduct
- (b) Request for Sexual Favors or other verbal or written Communication
- (c) Physical conduct of a sexual nature or sexually demeaning attitudes
- (d) Causing interference with Work Performance or creating an intimidating, hostile or sexually offensive work environment.
- (e) Attempt to punish the complainant for refusal to comply with such a request or is made a condition for employment.
- (f) Sexual violence at Workplace including any interaction or situation that is linked to official work or official activity outside the office.

BEEF have adopted zero tolerance towards Harassment/Sexual Harassment cases and ensures all such circumstances must be reported on immediate basis. Furthermore, retaliation to such reports will be treated as misconduct and disciplinary action will be carried out against harasser. BEEF will also ensure that all types of these cases must reach its conclusion on priority basis as per Disciplinary / Grievance Policy of the Organization.

6.9 ENVIRONMENT, HEALTH AND SAFETY POLICY:

BEEF is committed to provide safe working environment for all its Members and ensures that all members contribute towards environment protection, conserving nature as well as ensuring safety measures in respective work areas. Therefore, all Members are considered responsible for conducting safe and environmentally sound operations. Moreover, any form of unsafe working methods, violence, threats of violence, intimidation of others or attempts to create fear in others will not be tolerated in BEEF.

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6.10 WAIVER OF THE CODE:

Any waiver of the applicability of the Code or Waiver of application of any provision of the Code to any Member must be approved in writing by the CEO/BoD.

7. **EMPLOYEES RESPONSIBILITIES**

7.1 CONFLICT OF INTEREST:

The term 'Conflict of Interest' pertains towards a situation which may lead to compromise or appearance of compromising professional judgement due to clash between personal and professional affairs.

All Members must not engage in any business or activity, which may result in conflict in interest with BEEF. There are many situations which may lead to conflict of interest and it's quite difficult to distinguish between proper and improper activities. However, mentioned below are some common circumstances which may result in conflict of interest, actual or potential.

- 7.1.1 Members must not engage in any outside activity / employment that may compromise their performance or responsibility to BEEF or otherwise in conflict with or prejudicial to the interests of BEEF. In acute need, such circumstances must be brought in the knowledge of BEEF and a written approval must be obtained from CEO to pursue outside work or employment. However, this restriction will not come in force to employees working on short term contract and Part-time contract but they must provide all the details to HR section related to any other occupation or business.
- 7.1.2 Generally, Members must avoid accompanying business with a relative or with a firm / Organization in which a relative / related party is associated in a significant role/position.
- 7.1.3 On the contrary, if transaction with related is unavoidable than in these circumstances, Members must fully disclose their interest to the relevant Section Manager and CEO. Similarly, due records for such approvals / transactions will be maintained as future reference.

7.2 HONESTY AND INTEGRITY:

All Members will carry out their activities, on behalf of BEEF or in their personal capacity, with honesty, integrity and fairness. They will act in good faith, with responsibility, due care, competence and diligence, allowing independent judgement to their subordinates. Members are trusted to act in the best interest of BEEF and fulfill their fiduciary obligations.

CEO. Karthika



7.3 CONFIDENTIALITY OF INFORMATION POLICY:

BEEF's confidential information is a valuable asset and Members must understand the importance of such information. Similarly, Members must ensure protection of all confidential nature either business or personal information obtained from clients, associates and employees.

Any type of information related to BEEF's business, services, finances, customers, suppliers, etc. which is not in Public domain and to which Members have access or possess such information will be considered confidential unless authorized to disclose or such disclosure is required as matter of law. Furthermore, Members under any circumstances provide any information either formally or informally to media or any other source outside BEEF, unless specifically authorized to do so.

7.4 COMPLIANCE WITH BEEF'S LAWS, RULES AND REGULATIONS:

All the Members are required to comply with all the applicable laws of the land, rules and regulations both in letter and in spirit during performance of different operational and programmatic activities. It is the responsibility of Members to support BEEF in the promotion of lawful and ethical behavior and report immediately to HR Officer to any actual or possible violation of law, rules, regulations or Code of Conduct.

7.5 SELECTION OF SUPPLIERS AND SERVICE PROVIDERS:

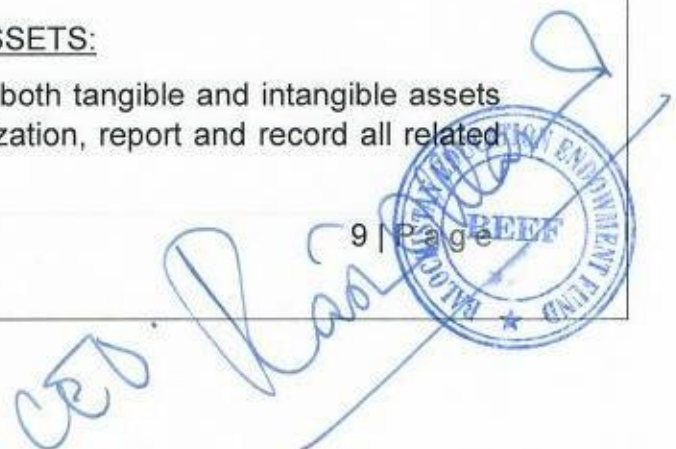
BEEF strongly believe suppliers contribute significantly towards its success. Therefore, its policy is to purchase / avail supplies based on need, quality, service, price and other commercial terms and conditions. All suppliers will be selected based on merit, price, quality and performances. In addition BEEF will select suppliers against significant supplies through a competitive bid process as per Balochistan Procurement Regulatory Authority (BPRA) rules. Under any condition BEEF or its employees, agent or contractor attempt to take any advantage from suppliers that may lead to any unethical business practices.

7.6 INTELLECTUAL PROPERTY POLICY / TRADE SECRETS:

It is the outmost obligations of all Members to identify and protect the intellectual properties, trade secrets, price-sensitive and confidential information in professional as well as personal capacity owned by BEEF and its clients or associates as it is critical to the success.

7.7 SAFETY AND EFFICIENT USE OF BEEF ASSETS:

It is the responsibility of Members to protect both tangible and intangible assets and property of BEEF to ensure optimal utilization, report and record all related transactions.



Members will protect BEEF's asset from loss, damages, misuse or theft. Assets provided by BEEF must be used for specified purposes specifically approved by management and must not be utilized to meet personal needs or serving illegal purposes.

7.8 HARASSMENT:

All members must maintain an environment that is free from all kinds of harassment and in which all members are equally respected. Workplace harassment includes any action that creates intimidating, hostile or offensive work environment. Such actions includes but not limited to harassment, sexual harassment, disparaging comments and discrimination based on gender, management level, age, race or religion. Any misconduct pertaining harassment or violence will be dealt with strictly and as per Disciplinary / Grievance policy of BEEF.

7.9 GIFTS AND DONATIONS:

Members should not directly or indirectly receive or offer any gifts, donations, remuneration, hospitality, illegal payments and comparable benefits which are intended or perceived to be intended to obtain business or uncompetitive favors or decisions for the conduct of business. However, gifts of commemorative nature for special events may be accepted.

7.10 DRESS CODE:

BEEF have always encouraged professional workplace environment and expects its employees to portray a professional and business like image at all times. All employees must maintain and appear in decent dress code and neat and clean during their presence in workplace. Flashy, revealing dress or jewellery are prohibited. Similarly, during field visits dress code must be adopted by employees keeping in view working conditions while ensuring sensitivities of the local culture and traditions.

7.11 INTERNET USE / IT CODE OF CONDUCT:

All members must ensure efficient use of Internet and IT resources and ensure their usage for business purposes and avoid using them for meeting personal commitments. Electronic Mail (Email) and Internet facilities must not be used in any way that is unethical or illegal and defame BEEF in any way. All the provided Hardware and Software's must be used in a responsible manner. Only MIS/IT Manager or his/her delegates reserves the right to install, alter, replace, modify, upgrade or delete any software application or remove any IT hardware.



7.12 SUBSTANCE ABUSE:

Using any kind of illegal drugs / alcohol in any form is prohibited on all BEEF's locations/premises and during work related travel and field visits. Similarly, the use of all kinds of medication that causes intoxication, paan, chalia, gutka and alike are strictly prohibited in BEEF's premises and any one found guilty will be liable to disciplinary action.

7.13 SMOKE FREE ENVIRONMENT:

BEEF is committed to provide a smoke-free healthy environment where smokers and non-smokers alike, can contribute in good health. Accordingly, smoking will be allowed in designated premises or areas marked by Administration department.

7.14 GAMBLING:

All forms of gambling / betting in BEEF's premises are strongly prohibited.

7.15 WEAPON POSSESSION:

Possession of a weapon in the workplace or outside while conducting BEEF activities is forbidden. Violation to this policy may lead to disciplinary action, including termination from service and involvement of appropriate law enforcement authorities to probe matter.

7.16 POLITICAL / RELIGIOUS EVENTS:

All members will not engage in any activity of any sort that illustrates racial indications of their political or religious beliefs within BEEF's premises or sponsored events arranged outside.

7.17 REPORTING ILLEGAL OR NON-COMPLIANT CONDUCT:

It is each employee's responsibility to ensure full compliance with all provisions described in this Code and in case of ambiguity seek guidance whenever deemed necessary from their Section Head, Chief Operating Officer (COO), Human Resource or from the CEO. To ensure the highest standard of integrity, it is each employee's personal responsibility which cannot be delegated.

Whenever there is any type of doubt, Members should always be guided by the basic principles stated in Purpose of this Code. However, Members are expected to use their own good judgment to conform with the intent and spirit of this Code in all matters even if not specifically stated herein. Any non-compliance observed by any Member should be immediately reported to HR. Any failure to comply with this Code may result in disciplinary action, including



the possibility of dismissal and, if warranted, legal proceedings or criminal sanctions.

7.18 REPORTING THROUGH WHISTLE BLOWING

Whistle Blowing is a method through which BEEF employees and stakeholders feel free and safe towards disclosure of any corruption or wrongdoing. BEEF always intends to provide secure and independent mechanism through which any actual or potential corruption or wrongdoing can be communicated to BEEF's Management in an efficient manner. In this regard, following should be considered:

- Complaint Box is placed outside Chief Executive Officer (CEO) which is managed by Chairman BEEF.
- Written Complaint can be launched under of Private and Confidential cover and can be sent directly of Head of Internal Audit Department at Block No.9, Room No.13 Balochistan Civil Secretariat Quetta
- All concerns can also be sent through email at whistleblow@beef.org.pk or through fax #081-9202096 or through visiting BEEF's website www.beef.org.pk
- Direct Contact with Head of Internal Audit Department can be made on Landline #081-9204430

BEEF committed to this policy and encourages staff and other stakeholders to raise their voice against genuine potential or actual Corruption or wrongdoing. Moreover, it is expected that Whistle Blower raise the concerns in good faith and without any malice and that the charges contained in his/her complaint are based on true ground. All the information receive through whistleblowing will remain confidential and whistleblower will be protected against unfair treatment from his/her colleagues and or management as a consequence. However, any anonymous complaints will not be entertained by Whistle Blowing Committee (WBC).

7.19 AFFIRMATION BY MEMBERS:

Upon confirmation of employment, each Member will endorse an 'Affirmation' to this Code.

Please refer to **annexure A** for standard affirmation



ANNEXURE – A

DECLARATION FORM

"I _____ solemnly affirm;

That, to the best of my ability, I will carry out my responsibilities in a manner that will further the interests of the Balochistan Education Endowment Fund;

That I will refrain from communicating confidential information to person(s), not suited to and /or outside BEEF;

That I will not use to any private advantage of my position or information in my knowledge.

That I have read and understood the Staff Regulations and hereby commit myself to abide by them; and I further undertake to abide by any addition so alterations to these Regulations that maybe issued from time to time; and

That I will not accept instructions with regard to the performance of my duties from any authority external and / or subversive to BEEF image or growth or not conforming to the rules and regulations applicable to BEEF"

Date: _____

Signature _____

