



DAS-PI-10, Rev:00
Effective Date:01-08-2025



CODE OF CONDUCT

CEO Message:

Our success is originated on our collective commitment to our core values – **Truthfulness, Respect for all, Equality, and Transparency (TREAT)** by upholding these in all that we do, we build trust and respect with our Learners and business partners while also demonstrating that we are committed to conducting our business in an **Honest, Ethical, Accurate and Lawful (HEAL)** manner. Our values should guide our conduct and our conduct must represent our values.

This Code of Conduct is developed to help us understand our ethical expectations. I expect each of us to read, understand and abide by the Code in letter & spirit, and ask questions while holding each other accountable for acting according to highest ethical standards.

Thank you for your commitment to DAS Global Limited (DAS)

Applicability:

- a. DAS Code of Conduct sets out the standards required from its employees, Learners and members of Board of Directors.
- b. This requires complete compliance with applicable laws, rules, regulations and company policies always ensuring that all possible measures are adopted to prevent any loss or damage to DAS's interest and reputation.
- c. As DAS's unconditional commitment towards compliance is integral to our core values. Not only does DAS set out the standards required from its employees, it also sets out standards required from its, Learners, suppliers and vendors to adhere to ethical business principles.
- d. It also reflects our commitment towards integrity, which is an important characteristic of our daily business activities. Building a strong ethical culture is not only the right thing to do and the need of the moment; it also provides a framework within which we can carry out our work effectively. Breaching the Code or any of its policies can have serious consequences for DAS and/or its employees and Learners. Where illegal conduct is involved, it can also lead to significant actions.
- e. This Code applies to all DAS Employees and its Board Members ('Employees'). DAS also expects all employees to ensure they know and understand the requirements of the Code and policies. If there is ever any uncertainty about how to interpret these or have any doubts about whether specific behaviors meet the standards required. All Employees should immediately report actual or potential breach of the Code or any DAS policies whether relating to them, colleagues, Learners, Auditors, people acting on behalf of DAS and whether accidental or deliberate.
- f. The copy of this Code of Conduct by any suitable way is provided to all stakeholders on an annual basis and acknowledgement is taken.

Code of Conduct Principles:

We follow laws, rules, regulations and our policies, if any in conflict, we always uphold the laws.

We actively seek information, understand our responsibilities, and recognize our wider impact on the societies in which we operate.

We are transparent and honest, open and truthful about our challenges

We ask questions when in doubt and raise concerns without concern of retaliation.

At DAS we maintain a culture in which employees feel comfortable raising concerns and potential violations of the code of conduct. We prohibit retaliation against any employee at DAS who reports in good faith. Through reporting one DAS team, its promise to operate legally and ethically and we help the company to protect its good reputation.

1. Equality & Diversity Policy

DAS is committed to a working environment that promotes diversity and equal opportunity and where there is mutual trust, respect for human rights and no discrimination with any Learner, business partners. DAS is highly involved in ensuring safe and healthy working conditions for all Learners, visitors, employees and continuously striving to developing and enhancing each individuals' skills and capabilities.

In DAS we believe in promoting diversity and providing equal opportunities of growth for all. We meet everyone with insight, respect and understanding. We always try to fulfil the needs of our customers, Learners and support our colleagues in the best possible manner, whilst complying with laws, rules, regulations and company policies.

DAS employees must treat everyone fairly and equally, without discrimination on the grounds of race, age, role, gender, gender identity, color, religion, and caste, country of origin, sexual orientation, marital status, dependents, disability, social class or political views.

DAS employees must provide equal opportunity to all current and prospective employees/learners in induction process, promotions, benefits, talent development and rewards without any regard to race, gender, age or physical ability.

DAS employees must respect all inherent differences and recognize that having diverse views / experiences in the workplace facilitates in the development of DAS through diversity.

2. Workplace Harassment Policy

DAS ensures that all human rights are upheld across DAS network. DAS expects all Employees to create a working environment free from intimidation and harassment. As an organization DAS focuses on the work ethics and professionalism of the Employees irrespective of their age, gender or designation and every employee is to be treated fairly and equally, without any discrimination whatsoever.

Unwelcoming advances (sexual or non-sexual in nature) or other inappropriate personal conduct, such as making jokes or insults, displaying, emailing, texting or otherwise distributing offensive material of sexually explicit nature, misusing personal information, creating a hostile or intimidating environment, isolating or not co-operating with a colleague, or spreading malicious or insulting rumors as defined in the Protection Against Harassment at the Workplace Act 2010, are prohibited. Harassment may including but not limited to overt advances, bullying, demeaning comments, language and gestures. If you feel that you are the victim of harassment you should immediately report the matter to the CEO.

3. Secondary or Dual Employment by Employees

As a principle, DAS considers any secondary or dual employment in conflict with the best interest of the company. Therefore, in the best interests of DAS, any secondary or dual employment is strictly prohibited. In the event if it is discovered that any Employee is engaged in any secondary or dual employment as part time or in 2nd shift, DAS reserves its right to suspend and/or terminate such Employee(s) with immediate effect.

DAS employees should not engage in any business or other activity (internal or external) that might interfere with their duties and responsibilities to the company or otherwise have any negative effect on or impair the ability of the employees to perform and carry out their duties and responsibilities to the best of their abilities. Employees are also prohibited from directly or indirectly taking part in activities that further interests contrary to DAS's culture and policies.

DAS Employees are not permitted to undertake any fulltime or part time employment, work or assignment of any sort with or without any remuneration with any other organization and/or entity with in duty hours or on off days. However, in addition to their jobs with DAS, they can allow 'part time and without remuneration' teaching, learning, training, coaching and educational assignments post obtaining written approval from the CEO. In case of 'paid' teaching, learning, training, coaching and educational assignments, prior approval of Chief Executive Officer will also be required, however such paid assignments are not encouraged in general. Following permission, Employees are still restricted from performing any work or assignments whatsoever during office hours on working days.

4. Competition

Fair and level competition is important to society and contributes to increased welfare as well as creating business opportunities for DAS. We at DAS supports fair and open competition.

As a DAS employee, you shall not cause or be part of any breach of general or special competition regulations, such as illegal cooperation on pricing, illegal business dealings/ sharing or any other behavior that is in breach of relevant DAS policies, against the business, your job position and professional ethics.

5. Corruption and bribery

Corruption is a cancer and threat to business. In addition to unfair competition, it can also result in individuals being subject to blackmail and imprisonment. For DAS, anti-corruption is not only a legal obligation and an ethical standpoint, it is also in our own interest to stand against corruption and/or corrupt practices be it internal or external.

DAS does not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain. No DAS Employee may offer, give or receive any gift or payment, which is, or may be construed as being a bribe. Any demand for or offer of a bribe

must be rejected immediately and reported to the management. As DAS employee, you shall never offer, give, ask for, accept or receive any form of bribe or payment that may be construed as a bribe.

6. Gifts, Entertainment and Corporate Hospitality

Hospitality can play a positive role in building relationships with customers, suppliers, Learners and other third parties. Likewise, it is sometimes appropriate to offer reasonable gifts, e.g. in the context of building better relationships. However, as accepting, giving away or receiving gifts and hospitality can be open to abuse or generate actual or perceived conflicts of interest, this should occur sparingly and always be legitimate and proportionate in the context of DAS's business activities.

Unless otherwise expressly permitted, we do not offer or accept expensive or extravagant gifts or business courtesies. Nor do we offer or accept any cash or cash equivalents as gifts worth more than USD 50/= or equivalent PKR to/ from within any calendar year.

Our relationships with suppliers, customers, Learners and others must be based entirely on sound business decisions and fair dealing. Business gifts, entertainment and corporate hospitality can help build relationships, but they can also make it harder to be objective about the person or company providing them. We may never:

- Solicit, offer, accept or provide directly or indirectly any gifts, entertainment, and corporate hospitality or travel if it will obligate or appear to obligate the person who receives it.
- Solicit, offer, accept or provide to anyone directly or indirectly cash or cash equivalents, lavish or frequent gifts or entertainment, or anything that might look like a bribe.

Occasional business lunches and meetings outside the general office setting with suppliers, customers, learners and others do not fall under the ambit of Corporate Hospitality and are only permissible if expressly approved in writing by the CEO/Director.

7. Information, communication and media

DAS employees must follow the ethical standards of our Code when using social media, mobiles, online communication tools, or any public communication medium, primarily the following:

- Social Networks
- Forums and Blogs
- Wikis
- Mobile phone
- Chat GPT

While DAS employees, may use these mediums, they must adhere to the Code and applicable policies in order to avoid harming the company's reputation, disclosing confidential or restricted information, or making statements on behalf of DAS.

We don't share DAS information through social media unless we have specific approval to use the information publicly. All employees of DAS shall use only company provided mobile phones for business calls, business calls through personal phones are not allowed.

8. Political activity

DAS does not take political positions or is associated with any political movements. However, DAS may occasionally participate in public debates which are of importance to DAS's strategies and business performance. DAS does not support political parties, neither in the form of direct financial support nor paid time.

DAS Employees may choose to offer support and contributions to political parties or groups in their personal capacity and give no impression of being connected to DAS whatsoever. Their personal political support or contributions should not affect their performance or objectivity at work in any way.

No political activities shall be carried out while on official duty during office hours on working days and at any of the company premises whatsoever.

9. Conflict of Interest/ Impartiality

DAS in the business of 3rd Party certification, Professional Training, so maintaining the impartiality is core requirements to avoid any conflict of interest.

A Conflict of Interest occurs when a personal or family interest interferes with our ability to make sound, objective business decisions on behalf of the Company. DAS respects the right of employees to manage their personal affairs and investments but expects them to avoid any situation that may involve a conflict between their personal interests and the interests of the company.

As in all other facets of their duties employees dealing with customers, suppliers, learners, contractors, or any person or organization doing or seeking to do business with DAS must be in the best interest of the company and must exclude any consideration of personal preference or advantage. It is equally important to avoid apparent conflicts of interest where an observer might assume there is a conflict of interest and therefore a loss of objectivity in their dealings on behalf of DAS.

When faced with a potential conflict, you should ask yourself:

- Would this activity create a direct or indirect incentive (financial or otherwise) for me or for my close family and personal relationships?
- Would others perceive this situation to apparently create an incentive for me or for my close family and personal relationships?
- Would this situation create an incentive for an associated business at the expense of DAS?
- Would this situation create a constructive or legal obligation on my part to give favor to entities or organizations dealing with or against DAS?

Service to DAS as trainer, auditor shall never be subordinated to personal gain and/or advantage. Any decision on behalf of DAS shall be based on objective and fair assessment of DAS's interest without being impacted by any other considerations. Existence of actual or perceived conflict of interest shall be disclosed in writing to the immediate line manager and skip level manager. Disclosed conflicts shall be processed in accordance with DAS's governing documents.

As a principle, DAS considers holding of public office or any secondary employment or fulltime or part time work/assignment by any employee to be in conflict of interest of the Company. Any employee found to be in conflict with the interest of the company, which has not been disclosed, may face serious repercussions. DAS Employees shall not compete with the company or take any personal advantage of business opportunities that they discover during the employment with DAS.

10. Confidentiality

DAS respects and maintains all sensitive information with due care which is confidential in nature as per best industry practices.

At DAS we safeguard information that is of a sensitive nature or which is classified as confidential due to any reasons. Information from external parties (Clients, Learners, and Vendors) shall be treated with the same level of confidentiality as our own information. The duty of confidentiality also applies after the conclusion of employment or contractual relationship with DAS, for a period of five (5) years or for as long as the information is considered confidential, whichever is later.

It is your duty to ensure that information you create or receive is correctly classified and only disclosed in accordance with DAS's SOP's and policies. If confidential information is to be shared with external parties, it is your duty to ensure that a written confidentiality agreement is in place.

11. Personal data and privacy

Customers, Employees, Learners and other related parties need to feel confident that their personal data is processed in such a way that data is only used for legitimate business purposes only.

DAS's processing of customers' and employees' personal data for official/business purposes shall be subject to proper care and awareness. Processing of personal data by the company directly and/or indirectly through third parties shall be including but not limited to, what is needed for any official / operational purposes, efficient customer care, relevant commercial activities, digitalization of company records and proper administration of human resources.

DAS employee, learners personal data highly confidential and shall only share with relevant persons/parties including third parties when needed for any official purposes. For customers/vendors data we shall only collect, process, and store their data for legitimate business purposes and such data no longer than necessary for the purposes for which any data was collected. DAS process customers/vendors information in accordance with the relevant laws and regulations on protection of personal data.

12. Intellectual Property

Intellectual property such as trademarks, copyrighted works, inventions, presentations, training materials, accreditation procedures, policies etc, trade secrets and know-how, are often valuable and important to DAS.

DAS's intellectual property shall be safeguarded from unauthorized access, sharing and illegitimate use. DAS shall respect the intellectual property of others.

DAS Employees shall protect and process intellectual property in the best interest of DAS and shall not make unprotected intellectual property available to external parties without prior authorization from the company management and a signed confidentiality agreement from such parties. DAS Employees shall not infringe the intellectual property of others and shall comply with all confidentiality obligations regarding trade secrets disclosed by third parties.

13. Sanctions

Each employee is accountable for ensuring that he/she is complying with all the provisions of the code of conduct and seek guidance where necessary. Any breaches may lead to disciplinary action including termination of the employment. Misconduct that may result in disciplinary action includes (but is not limited to):

- Violate or ask others to violate, laws, rules, regulations, company policies, this Code or governing documents
- Failure to promptly raise a known or suspected violation of this Code, company policies, laws, rules and/or any regulations
- Failure to cooperate in DAS investigations of any possible violations of this Code, company policies, laws, rules and/or any regulations
- Retaliation against any employee for reporting integrity concerns in good faith

If a violation has occurred, DAS reserves the right to take suitable disciplinary or preventive actions, as it deems appropriate.

14. DAS Whistle Blowing Policy

DAS is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, DAS has an impartiality committee and any complaints received is presented in that committee for further decision and action as required.



CONFIRMATION

I hereby agree and confirm that I, have read and understood DAS's Code of Conduct and shall comply with its principles and requirements being mandatory in nature. Further, any violation/non-compliance of this Code by the undersigned knowingly or unknowingly shall be deemed and treated as a breach under any existing and/or any prospective employment agreement/contract and can result in termination of any/or all contract(s)/agreement(s) and/or initiation of appropriate disciplinary action as DAS deems fit and appropriate.

Place, Date

Employee Position.

CNIC No.

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Name (Block Capitals)

Signature

Disclaimer

It is the responsibility of the Employee to ensure that he/she is well versed with the Code of Conduct following dissemination. In connection with the non-management company employees if anything in this Code of Conduct is found to be in contravention to any of the Labor laws of Pakistan then the Labor Laws shall prevail at all times. However, this will not render the remaining provisions of Code of Conduct invalid for the non- management employees.