

# PTCL GROUP CODE OF CONDUCT

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CODE OF CONDUCT

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# MESSAGE FROM THE PRESIDENT AND CEO



## Message from the President and CEO

Dear Colleagues,

For over six decades, PTCL Group has been at the forefront of the telecom industry, not just because of what we do, but how we do it. Our journey, filled with milestones and achievements, reflects a legacy built on unwavering ethics, integrity, and trust. As we look towards expanding our horizons, our vision remains clear: to be the leading and most admired telecom and ICT service provider.

Our success is not measured by wins alone; the path we take to achieve them matters profoundly. It's about making a positive impact, fostering trust with our employees, shareholders, customers, and partners, and nurturing a culture where accountability and transparency aren't just words, but principles we live by every day.

The PTCL Group's Code of Conduct is our compass, guiding us through dilemmas and ensuring we maintain the integrity that has defined our past and will shape our future. It outlines not just our aspirations but our expectations from each one of you, regardless of your role or location.

I encourage you to immerse yourself in our Code, discuss its principles in your daily interactions, and never hesitate to seek guidance or voice concerns. Your commitment to these values is crucial as we continue to grow and achieve together.

Thank you for being an integral part of PTCL Group's ongoing story of success. Let's unite in our mission to not just lead but set new benchmarks for excellence in the telecom sector.

Regards,



Hatem Bamatraf  
P&G CEO





# OUR CODE OF CONDUCT

# Our Code of Conduct

**This is our Code – it sets out what we ask of everyone in order to Make Good Possible!**

At PTCL Group, our Code of Conduct is the cornerstone of our corporate ethos, embodying the highest standards of integrity and ethical business practices. It serves as the definitive guide for all employees, articulating how our Principles & Values should be applied in everyday actions and decisions. This commitment ensures we conduct our business with the utmost ethics, professionalism, and in compliance with all legal and regulatory standards. It outlines our collective responsibility towards employees, business partners, shareholders, and the communities we serve, emphasizing the importance of making informed and ethical decisions.

By adhering to this Code, we uphold our dedication to transparency, accountability, and excellence. This not only fosters a culture of trust and respect but also bolsters our long-standing reputation and success. The Code serves as a roadmap, guiding us through complex dilemmas with clarity and integrity, ensuring that we always act in the best interest of our stakeholders and the broader community.

For practical application, the Code, alongside its four core Principles, serves as a daily guide for ethical decision-making. While it is comprehensive, it cannot anticipate every scenario. In such instances, the Compliance Handbook provides additional insights, regularly updated to address evolving dilemmas and scenarios. If any internal policies and guidelines conflict with our Code, the Code will take precedence. Should uncertainties or ethical dilemmas arise, you are encouraged to seek advice from your line manager or the Compliance team. Additionally, the Whistleblower channel is available for anonymously reporting misconduct, ensuring a culture where speaking up is supported without fear of retaliation.

Our commitment to doing what's right is what defines us at PTCL Group.



# PTCL Group Values

**PTCL Group values are central to who we are and how we aspire to conduct business every day. These values resonate with our vision statement and our ambition to become number 1 in the industry, reflecting both our heritage and our aspirations.**



## Be Resilient:

We face challenges with determination, learning from setbacks to emerge stronger and more capable than before. Our resilience drives us forward, embodying our never-give-up spirit.



## Win Every Battle:

Our commitment to excellence is unwavering. Obsessed with success, we approach every challenge with the drive to overcome and excel.



## Think Big:

Our imagination knows no bounds. We harness creativity to drive innovation, inspiring ourselves and others to envision and achieve results.



## Value Success:

At the heart of our achievements are our people. We celebrate the efforts and accomplishments of every individual, recognizing that collective success is built on the strength of our team.

# Code Principles

Aligned with the PTCL Group values, the Principles of this Code lay the groundwork for our ethical culture, defining the essence of our business conduct with clarity and purpose. These principles are pivotal in guiding our actions and decisions, ensuring that we not only achieve our objectives but do so with integrity and respect for all stakeholders.



## We Lead With Integrity

We adhere to laws, regulations, and internal policies, committing to the highest standards of ethical conduct in all situations. Our commitment to honesty, openness, and accountability, guides every decision and action. By fostering a transparent environment, we ensure that concerns can be raised and addressed without fear.



## We Embrace Agility & Innovation

We embrace change and encourage innovation by collaborating with each other and adapting quickly to new challenges and opportunities. By valuing flexibility and a proactive approach, we stay ahead in a dynamic market, ensuring our innovative efforts align with our ethical values and organizational goals.



## We Prioritize Customer Commitment

Our customers are at the heart of everything we do. We are dedicated to understanding their needs and exceeding their expectations through exceptional service and ethical conduct. By consistently fulfilling our promises and building trust, we strengthen our relationships and drive continuous improvement.



## We Foster Diversity & Inclusion

We value the diverse backgrounds and perspectives of our employees and stakeholders. Our commitment to inclusion ensures that everyone feels valued and empowered. By fostering an environment where diverse voices are heard, we drive innovation through respect and empathy, contributing positively to the communities we serve.

# To Whom Does This Code Apply?

This Code of Conduct is applicable on Pakistan Telecommunication Company Limited ("PTCL") and its Subsidiaries, inclusive of its majority-owned or controlled subsidiaries and any joint ventures or entities under its influence, (herein after referred collectively as "PTCL Group" and individually as "Company" or "Companies").

It applies to all PTCL Group personnel, including full-time and part-time employees, contractors, directors, officers, advisors, consultants, and board members. Furthermore, we expect all external partners, such as agents, representatives, and other third parties acting on behalf of PTCL Group, to adhere to equivalent ethical standards, ensuring a uniform commitment to integrity across all our business dealings.





# OUR RESPONSIBILITY



# Our Responsibility

We want everyone working for and with PTCL Group, independent of role, rank, and responsibility, to comply with our Code in their day-to-day work and take actions that will preserve the trust that our customers and society place with us.

## 1. What our Code means for

### Our commitment as an employee

As part of our collective endeavour to uphold the highest standards of ethics and professionalism, each PTCL Group employee is entrusted with key responsibilities:

- **Embrace and Act with High Integrity**

Every employee is expected to prioritize ethical conduct and professionalism in all their actions.

- **Understand and Adhere to Our Code**

It is crucial for all employees to diligently read, comprehend, and follow our Code, including all related policies and manuals.

- **Proactively Raise Concerns**

Employees should use the designated "How to Speak Up" channels to ensure a culture of transparency and accountability.

- **Engage in Continuous Learning**

Participation in and timely completion of all required training sessions related to the Code is mandatory.





### • Seek Further Guidance

In the face of ethical dilemmas or uncertain situations, employees are encouraged to seek further guidance and cooperate fully in investigations.

### • Avoid Harmful Actions

Actions that could damage PTCL Group's reputation or lead to unethical or unlawful practices must be consciously avoided.

### • Safeguard Company Interests:

Every employee is expected to act responsibly and diligently to protect PTCL Group from reputational, financial, operational, legal, compliance, and cybersecurity risks.

## Our commitment to stakeholders

### • Our customers:

Through Integrity and Compliance, we engage with our customers with the highest ethical standards, ensuring exceptional service and exceeding expectations. This principle fosters a relationship built on trust, where customers are assured of our commitment to transparency and accountability in every interaction.

### • Our partners and suppliers:

Embracing Transparency and Honesty, we cultivate open and fair relationships with our partners and suppliers. This commitment to clear and honest communication ensures that all business dealings are conducted ethically, fostering a collaborative environment that respects the rights and contributions of every stakeholder.

### • Our commitment to the environment:

Upholding Accountability and Leadership in our environmental stewardship, we actively engage and communicate with our stakeholders about our environmental goals and initiatives. Our approach to Open Communication encourages dialogue and collaboration, not just internally but also with our partners and suppliers, to promote sustainable practices and reduce our environmental impact. This collective effort demonstrates our commitment to transparency and responsibility in addressing environmental challenges.



## 2. Our Leadership

At PTCL Group, leadership is fundamentally intertwined with our organizational culture, reflecting principles and values that meet the highest standards of honesty, integrity, and ethical conduct. Our leaders, across all levels, are dedicated to championing these core principles and values every day, fostering a workplace that is respectful, inclusive, and positively uplifting for everyone.

**Our managers and senior leaders are expected to act as role models by:**

- **Cultivate an ethical environment**

Leaders are responsible for creating and maintaining a safe, positive, and ethical work environment, actively promoting the code principles and organizational values and the importance of ethics and compliance through their actions and decisions.

- **Lead by example**

By living the “Tone from the Top,” leaders must exemplify integrity and transparency, especially when faced with challenging situations, and ensure all hiring, promoting, and delegating practices are conducted legally and ethically.

- **Support professional growth**

It is vital for leaders to encourage continuous learning and development, providing opportunities for all employees to advance and succeed in their roles.

- **Maintain vigilance**

Being alert to potential misconduct and ensuring timely and appropriate responses to any concerns raised by colleagues are key responsibilities. Leaders must foster an open-door policy, where asking questions and voicing concerns are encouraged and protected from retaliation, including those participating in investigations.

- **Ensure accountability and compliance**

Leaders must maintain accountability among all employees. Further, they are responsible for managing conflicts of interest effectively, anticipating, and mitigating compliance risks, and preparing teams to navigate ethical dilemmas successfully.

- **Foster diversity and inclusion**

A commitment to diversity and inclusion is essential, with leaders creating a welcoming environment that celebrates differences.

- **Promote ethical practices**

Leaders must guard against creating undue pressure that might encourage unethical behaviour. Ensuring that objectives, targets, and deadlines are realistic and ethical is fundamental to maintaining the organization's integrity in all business practices.





# WORKING TOGETHER

# Working Together

## 1. How we treat each other

PTCL Group strives to create a working environment that respects diversity and gives employees the opportunity to learn, grow and develop their talents. Employees, in turn, must treat each other and third parties respectfully and fairly.

Everyone shares responsibility for fostering an environment that allows and creates a diverse and inclusive workplace. At PTCL Group, we believe diversity is our strength.

Our goal is to impact lasting change through our actions and build a company that represents a variety of backgrounds, perspectives, and abilities at all levels. PTCL Group believes that everyone should be treated with dignity and respect, therefore, PTCL Group prohibits all forms of discrimination (including gender discrimination), harassment (including any forms of sexual harassment), bullying, humiliation, threats of violence and abusive or offensive behaviour.

These behaviours are considered a serious act of misconduct and may subject you to disciplinary or legal action.

Everyone working for and with PTCL Group, is empowered to take immediate action, in due process, regardless of role, rank or responsibility when they see a situation that interferes with our Code and PTCL Group's standards of ethics and integrity.



# How We Treat Each Other



## 2. Diversity, equity & inclusion

At PTCL Group, we believe diversity is our strength. Our goal is to impact lasting change, through our actions and build a company that represents a variety of backgrounds, perspectives, and abilities at all levels. Together, we unite to foster an inclusive, equitable environment for all. Every employee is expected to treat everyone with whom we have contact, with dignity, courtesy, and respect.

Our employees have the right to work in a safe environment free from discrimination. By complying with our Code, you are to ensure that we create working lives that are free from discrimination, bullying and harassment, where everyone can achieve their full potential.



## 3. Equal opportunities in employment

At PTCL Group, we treat our colleagues, candidates, clients, and business partners fairly and on merit. PTCL Group prohibits any form of discrimination directly or indirectly because of age, race, colour, sex, religion, national origin, social origin, disability, and any other characteristic protected by law.

At PTCL Group, we consider the employment relationship of our employees on the principle of equal opportunity and fair treatment and do not discriminate with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, and disciplinary practices.

### We work together to make sure:

- There are no forms of unlawful discrimination in all aspects of employment including in recruitment, promotion, opportunities for training, pay and benefits.
- Candidates for employment or promotion are assessed objectively against the requirements for the job.
- All employees are fairly compensated in line with industry standards.
- Disability and personal or home commitments do not form the basis of employment decisions except, where necessary.

We understand discrimination is not limited to in-person interactions, it can also be online via email, instant messaging, text, video calls, and posting comments on social media (including personal social media accounts). PTCL Group recognizes that training is a key factor in the promotion of diversity and inclusion at work and takes steps to increase employee awareness of the values and principles required to apply our Code in practice.

## 4. Bullying and harassment

You have the right to feel safe, welcome, and comfortable as you conduct your day-to-day tasks and to work in an environment which is free from bullying, harassment, intimidation, discrimination, or threats of violence for any reason, including actions based on gender, sexual orientation or identity, race, ethnicity, disability, national origin, religious or cultural beliefs or citizenship. In line with our principles and values, you should feel empowered to raise challenges and make complaints if you experience any behaviour that falls below this standard.

Bullying can take many forms, usually described as unwanted behaviour that is offensive, intimidating, malicious, or insulting. It often involves an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone. Power does not always mean being in a position of authority; it can also include personal strength and the power to coerce through fear or intimidation. Bullying can be physical (e.g., hitting, pushing), verbal (e.g., name-calling, threats), or non-verbal (e.g., exclusion, spreading rumours).

Harassment, on the other hand, is characterized by unwanted conduct related to a protected characteristic (such as race, gender, sexual orientation, religion, age, or disability) that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. Harassment can be a pattern of behaviour or a single incident and can occur in person, on social media, or through emails or calls. Importantly, conduct can be considered harassment even if the person did not intend to cause offense. Examples include making derogatory remarks, displaying offensive images, or making unwelcome sexual advances.





## We should remember that something, although intended as a "joke," may offend another person.

Different people find different words, actions or conduct acceptable and unacceptable. We each have the right to decide what behaviour is acceptable to us and to have our feelings respected by others. As a diverse organization, it is important that we should all be respectful and mindful of each other's cultural considerations.

We understand that any form of bullying and harassment can have serious consequences for individuals and the organization. Bullying and harassment may cause stress, unhappiness and/or affect health, family, and social relationships, and may affect an employee's work performance and could cause them to leave their job.

PTCL Group will not tolerate conduct by any individual that amounts to bullying, harassment, physical punishment, or victimization of another member of staff or third party; disrupts or interferes with another individual's work performance; or creates an intimidating, offensive or hostile environment.

We will treat any bullying, harassment, or victimization as a disciplinary matter, which might lead to dismissal. Aggravating factors such as abuse of power over a more junior colleague will be taken into account in deciding what disciplinary action to take. If the harasser or bully is a third party such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem. Serious harassment may be a criminal offence.





# Bullying and Harassment



## 5. Grievance Mechanism

At PTCL Group, we are committed to creating an open culture where employees feel empowered to raise concerns and seek resolution for any issues they encounter. We have established a comprehensive grievance mechanism to ensure that all employees can voice their problems, disagreements, disputes, or complaints with the assurance of receiving a fair, transparent, and timely resolution.

Employees are encouraged to first attempt to resolve their concerns by discussing them with their immediate supervisor or the concerned department. If the issue remains unresolved, it can be formally submitted as a grievance within 30 calendar days of the occurrence of the issue. The grievance may pertain to various aspects, including but not limited to work conditions, diversity related issues, facilities, and / or harassment.

### Where can I go to for help?

You should Speak Up. If you believe you are being bullied, harassed, or discriminated against, you should raise a grievance at "Meri Awaz Portal" in accordance with our Code.

- This includes interactions with customers or suppliers of PTCL Group or any other third party, which should also be brought to the attention of the People & Organization department.
- All such complaints will considered seriously and we seek to deal with them promptly.
- If your complaint is upheld, then you will be notified of this.
- The details of any action taken against the perpetrator as a result are usually confidential as between them and PTCL Group.
- Every effort will be made to ensure that anyone who makes a complaint about bullying, discrimination or harassment in good faith will not experience any detriment or be victimised because of making such a complaint.
- Any complaint of victimization will be dealt with seriously, promptly and (so far as practicable) confidentially.

Grievances can be lodged through multiple connectivity channels to ensure accessibility and convenience:

- **Online:** Meri Awaz Portal accessible through PeopleCare Experience Hub.
- **Email:** meriawaz@ptclgroup.com
- **Postal Mail:** Employee Relations Operations Room, The Nest,

For any further details, you can refer the Meri Awaz framework on PeopleCare Experience Hub.



## 6. Sexual Harassment

Sexual harassment is any unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated, even if this was not the intent of the person carrying out the conduct. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, or where a person is treated less favourably for either rejecting or submitting to sexual advances.

It encompasses situations which create an environment that is hostile, intimidating, offensive, degrading or humiliating for the recipient. All sexual harassment is prohibited whether it takes place within our premises or outside, including at social events, business trips, training sessions or conferences, or through any form of text messaging or social media.

Anyone who is subject to sexual harassment should in the first instance, if possible and appropriate, inform the alleged harasser that the conduct is unwanted and unwelcome. PTCL Group recognizes that sexual harassment may occur in unequal relationships (i.e., between a supervisor and their employee) and that there may be situations in which you may not feel able to inform the alleged harasser directly.

If you do not feel able to directly approach an alleged harasser, you should approach a member of the PTCL Group's Standing Committee on Anti Sexual Harassment, report by sending an email to [anti.harassment@ptclgroup.com](mailto:anti.harassment@ptclgroup.com).

### What can you do to help?

**We aim to create an inclusive environment at PTCL Group where everyone feels respected, valued, and confident. We can all play our part by:**

- Being aware of how your own behaviour may affect others and changing it, if necessary – you can still cause offence even if you did not intend to do so.
- Ensuring that you pronounce and spell your colleagues' names correctly.
- Treating your colleagues with dignity and respect.

- Taking a stand if you think inappropriate jokes or comments are being made.
- Making it clear to others when you find their behaviour unacceptable.
- Not standing by. This means intervening, when and if possible, to stop bullying, harassment, and discrimination you witness.
- Reporting harassment or bullying and co-operating in investigations.
- If a complaint of harassment or bullying is made, standing by, and supporting any colleague who raises an issue.

**Managers have a particular responsibility to fostering an inclusive culture by:**

- Setting a good example by their own behaviour.
- Ensuring that employees feel supported.
- Making sure that employees know what standards of behaviour are expected of them.
- Intervening to stop bullying or harassment.
- Reporting promptly via the relevant PTCL Group internal channels, any complaint of bullying or harassment, or any incident of bullying or harassment witnessed by them.

### Where can I go to for help?

You should Speak Up. If you believe you are being sexually harassed, you should inform your manager, or raise a grievance at ([anti.harassment@ptclgroup.com](mailto:anti.harassment@ptclgroup.com)) or directly contact any member of the PTCL Group's Standing Committee on Anti Sexual Harassment. All your details will be kept confidential unless you agree to disclose. For any further details, you can refer the Anti-Harassment framework on PeopleCare Experience Hub.

## 7. Drugs and Alcohol

PTCL Group has a zero-tolerance policy regarding substance abuse of any kind, including the use or possession of illegal substances and alcohol. All employees are prohibited from being at work or on company business whilst under the influence of alcohol or other illegal substances. Further, PTCL Group prohibits weapons on all the company's premises consistent with applicable laws.

## 8. Health and Safety

We are committed to providing a safe and healthy working environment for our employees and safeguarding the safety and well-being of our customers and partners and the communities in which we operate.

We expect all employees and third parties working for or on our behalf to abide by the health and safety rules and regulations, and to intervene if they see any practices that are dangerous or unsafe.

We understand it is our collective responsibility to ensure we report incidents, hazards and near misses in a timely manner to help learning and prevention and report any violation of health and safety that may put others at risk immediately.

## 9. Dress Code

At PTCL Group, we recognize the importance of professionalism in all aspects of our operations, including how we present ourselves. Our expectation is that every employee embodies the organization's values through their appearance, contributing positively to PTCL Group's image and reputation. We require adherence to a business casual dress code, with the understanding that certain roles or occasions may necessitate specific attire as directed by management.

### ● General Attire Expectations:

Clothing should be clean and tidy, reflecting professionalism and respect for the workplace.

Employees are expected to avoid attire that features offensive language or graphics or political affiliations, excessively revealing or provocative outfits, except as required for specific job functions or approved events.

### ● Exception:

Management may make exceptions to the dress code for health and safety reasons or to accommodate religious practices. Employees seeking such exceptions should contact their supervisor or the HR department.

## 10. Personal Relationships

At PTCL Group, we are committed to fostering a professional and positive work environment. Personal relationships, including friendships and romantic relationships, are a natural part of life.

However, it is imperative that these relationships do not interfere with our professional responsibilities or workplace dynamics. Employees in personal relationships with co-workers must always maintain professionalism and avoid any behaviour that could be perceived as favouritism or that could impact team morale or goes against workplace ethics. Transparency and honesty are crucial; if there is any potential for a personal relationship to influence work or create conflicts, it is essential to seek guidance from your line manager or the HR Department. By maintaining clear boundaries between personal and professional interactions, we uphold a respectful and collaborative workplace for all.



# BUSINESS PRINCIPLES

# 1. Our Brand and Intellectual Property

We have one of the region's most recognised and valuable brands, and we must take steps in protecting this valuable asset. We can protect our brand by complying with our brand guidelines and reporting any suspected misuse of our logos and trademarks, including any counterfeit goods or misappropriation.

We should not allow any third parties to use the PTCL Group branding or logo without proper authorization or consultation with the legal team. Our intellectual property (such as trademarks, copyrights, know-how, patents, trade secrets, research, technical data etc.) and confidential information that belongs to PTCL Group and/or third parties is a valuable asset, which in many instances, sets us apart from our competition. If we do not exercise care or fail to protect and properly record this intellectual property, then we risk losing this asset.

Everyone who gains such information is trusted with maintaining the confidentiality of this valuable information. Be aware of and safeguard any intellectual property and confidential information that is in your possession, whether it belongs to PTCL Group or a third party. The intellectual property of third parties can only be used with proper authorisation.

The penalties for infringement of either copyrighted materials (including software) or trademarks or other intellectual property are significant, and in certain cases criminal penalties may be imposed against the employees and PTCL Group. Failure to safeguard any intellectual property and confidential information can subject you and PTCL Group to legal and regulatory proceedings, fines, and imprisonment. Unauthorised uses of intellectual property and confidential information can also cause loss of revenue, remediation costs and damage to our reputation.

Please be aware that you remain bound to maintain confidentiality even after the end of your employment at or cooperation with PTCL Group in accordance with the contractually agreed period.

All products and contents that have been created while working for PTCL Group are the sole property of PTCL Group. No products and contents may be reproduced in any form, downloaded by any other means, or incorporated into any information retrieval system other than for official use, without PTCL Group's prior written permission.





## 2. Our Confidential Information

Confidential information shall be used only for company purposes and should not be disclosed to anyone outside of PTCL Group. When sharing information internally, only do so on a strict need-to-know basis.

When sharing confidential information externally, you should protect such information by sharing it only with authorised parties in a secure way (e.g., under the terms of an approved agreement). Please be prudent when you discuss confidential information at places where you might be overheard in public places.

You should not share company emails to your personal private emails and avoid the use of personal USB sticks or external hard drives to save or transfer company confidential information without obtaining appropriate approval.

You are expected to respect any confidentiality agreements between you and PTCL Group that relates to information under your control. Keep in mind that the use of any intellectual property or confidential information that belongs to PTCL Group might constitute a contractual breach and might lead to disciplinary or legal action.

You must immediately report the loss of any misplaced confidential information.

## 3. PTCL Group's Assests

Assets include everything that PTCL Group owns or uses to conduct business and serve our customers and society in the best way possible. Corporate assets can be financial, physical, or intangible which include buildings, equipment, time, funds, information, data, patents, and other intellectual property etc. Each of us is entrusted to apply due care and good judgement when using these assets. Be prudent when using PTCL Group's assets as you would use your own. Careless, inefficient, or illegal use of PTCL Group's assets is detrimental to the business.



## 4. Information Technology Assests

To protect our information technology assets, such as networks, computers, programs and data from attack, damage, theft, or unauthorised access by others, make sure you follow the processes and applicable internal policies PTCL Group has in place.

## 5. Financial Assests

To ensure accurate use of our financial assets, make sure all the expenditures are appropriately approved and accurately recorded in accordance with PTCL Group's processes and procedures.

## 6. Insider trading

Inside information is any non-public information that would impact the stock price of a company if it was known to the public, such as financial results not yet disclosed publicly, new products or services, pricing, potential mergers and acquisitions, senior management changes, significant legal matter, and dividend announcement etc.

Trading on inside information violates our ethical standards and is a personal criminal violation under any jurisdiction's laws and may lead to severe consequences for you personally and for PTCL Group as a company.

Sharing inside information with others who then trade on that information is considered tipping and is a violation of both our governing documents and the law.





# Our Assets



I am going on vacation. My daughter asked me if she could use my official laptop while I am away. Is it OK to give her my log-in and password?

Login and passwords help to keep PTCL Group information and technology resources secure. You must not disclose your login and password to anyone, even to your closest family members.



I have replaced the Internet cable at the reported location and it is working fine now. Can I take the leftover cables home?

Sorry, these cables are PTCL Group property and need to be disposed of properly through authorized process.

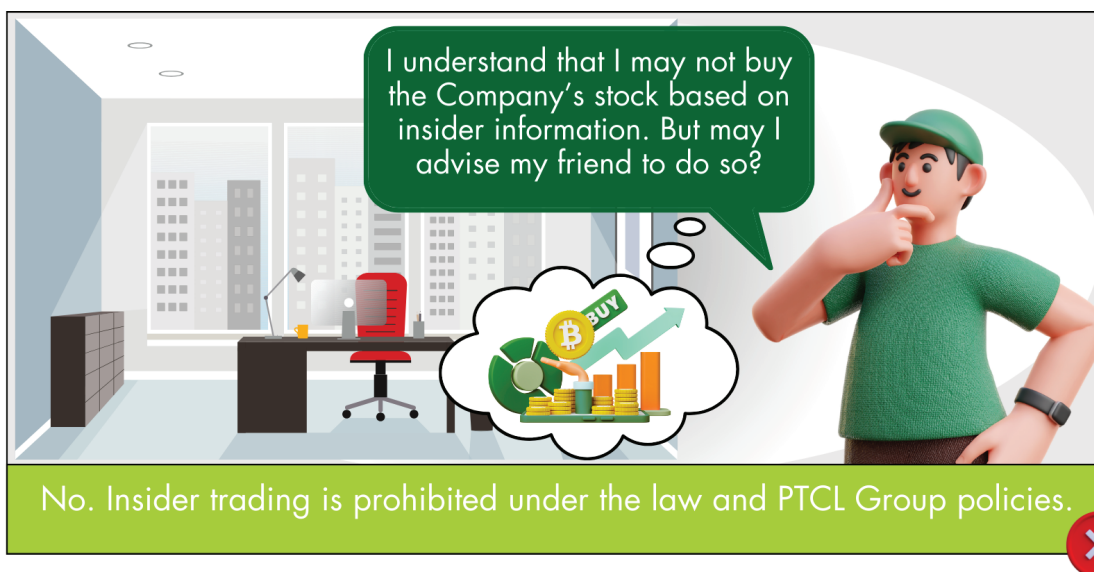
To safeguard PTCL Group assets, it's important to follow proper documentation and authorization procedures. Selling, transferring, or disposing of these assets without following protocols is strictly prohibited.



# Confidentiality and Information



# Insider Trading



## 7. Our Responsibilities

We each have a duty to look after and respect all PTCL Group's assets. We should protect PTCL Group's assets from misuse, theft, and waste. You can do this by :

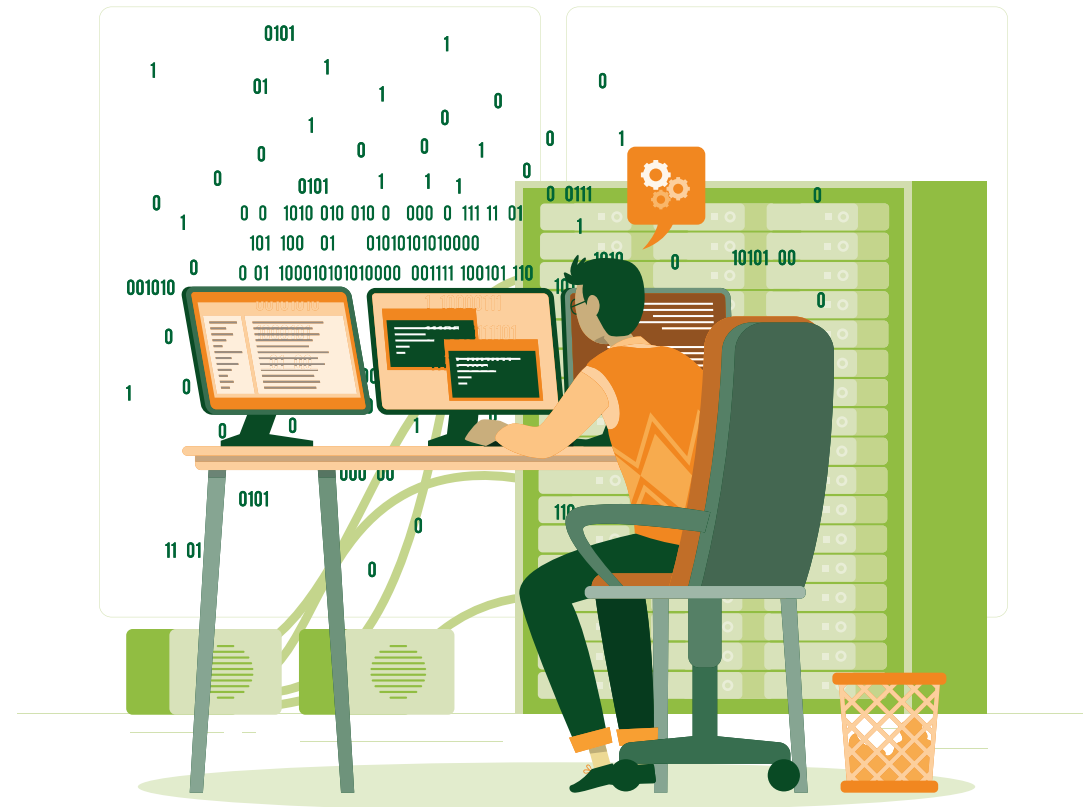
- Always Using PTCL Group's resources responsibly and appropriately.
- Ensuring hardware, such as laptops, phones, and other handheld devices, are never left in public or insecure places.
- Only using software that has been properly licensed and approved by the appropriate department for use.
- The copying or use of unlicensed or "pirated" software on PTCL Group's computers or other equipment is strictly prohibited.
- Reporting any suspicions you may have concerning theft, embezzlement, or misappropriation of any PTCL Group's property.
- Respecting and acknowledging the copyright and intellectual property of others, obtaining the appropriate consent or permission to use the intellectual property in our products, services, and activities.
- Ensuring business expenditure is accurately and honestly accounted for.

## 8. Social Media

Please act responsibly when discussing current affairs and expressing your opinion on social media. Remember to always 'be yourself' and if you do express opinions, you should clearly mention that anything you state reflects your personal opinion. We should remember that whilst we all have freedom of speech that does not mean freedom from its consequences.

You should not post anything on social media that is of a discriminatory nature or would constitute a threat, intimidation, or any other form of harassment or discrimination. In this digital age, the lines between public and private, personal, and professional are often blurred in the usage of social networks. By virtue of identifying yourself as an PTCL Group employee within a social network, you are connected to your colleagues, managers and even our clients.

You should ensure that content associated with you is consistent with your work at PTCL Group – this includes pictures, followers, and retweets. If you identify yourself as an PTCL Group employee and link back to a corporate Twitter, Facebook page or LinkedIn or any other social network platform, ensure that your profile and related content is consistent with applicable laws and with how you wish to present yourself with colleagues and clients.

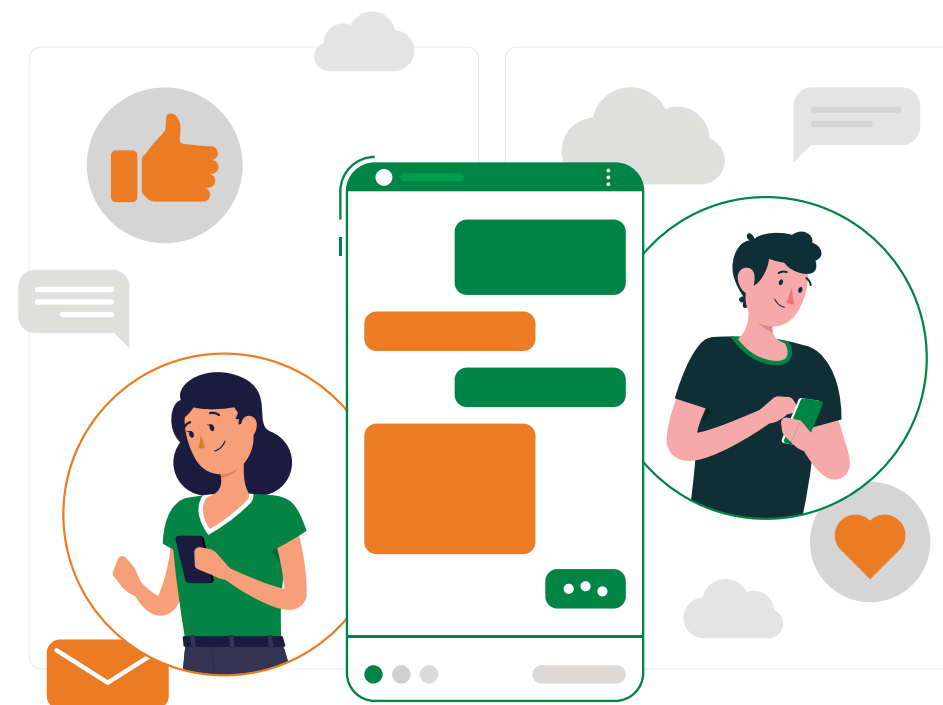




You should not use ethnic slurs, personal insults, obscenity or engage in any conduct that would not be acceptable in our workplace or which is in breach of our Code. Please respect confidentiality and do not provide PTCL Group's or another's confidential or media other proprietary information and never discuss our business performance or other sensitive matters publicly in any online social platform, even if you are expressing your own opinion and using a disclaimer. You should not cite or reference clients, partners or suppliers without their written approval and written approval of PTCL Group.

## 9. Political Affiliations

PTCL Group values the diverse opinions and beliefs of our employees. However, to maintain a professional and inclusive work environment, we prohibit the display or promotion of political affiliations, including but not limited to clothing, accessories, signage, or verbal endorsements, while on company premises or representing the company in any capacity. This policy also applies to social media platforms, where sharing political opinions may be perceived as representing the company's views. We encourage all employees to focus on fostering a respectful and collaborative environment within the workplace, free from divisive or politically charged conversations. Additionally, discriminating or treating employees unfairly based on their disclosed or undisclosed political affiliations is strictly prohibited. It is imperative for all employees to adhere to this policy to maintain a harmonious and focused workplace environment.





# LEGAL, RULES AND STANDARDS

# Legal, Rules & Standards

PTCL Group is committed to full compliance with the applicable laws, rules, and regulations, and expects the same from its employees and all third parties. In case there are different standards set forth in this Code compared to the applicable laws, rules, and regulations, PTCL Group expects the higher standard or more stringent requirements to be applied. Any such differences may be brought to the attention of PTCL Group's Ethics and Compliance Department.

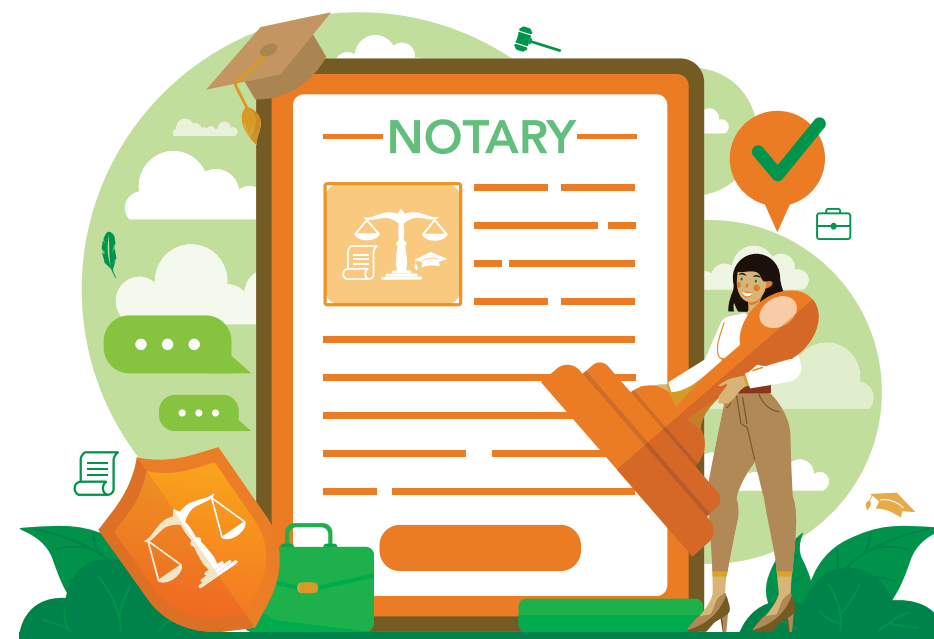
Please ensure that you are familiar with the applicable internal policies that address compliance with applicable laws, rules and regulations and make sure that you comply with them on a day-to-day basis. For more information, please consult PTCL Group's applicable internal policies which can be found on PTCL Group's internal network. If you do not fully understand the contents of our Code or the internal policies referred to within or if you need any additional advice, please contact the Ethics and Compliance Department.

## 1. Never engage in bribery or corruption

Engaging in bribery or corruption of any sort might result in serious reputational damage, permanent loss of opportunities, unfair competition as well as criminal and civil liabilities including fines and/or imprisonment. We, at PTCL Group, are committed to doing our part to prevent bribery and corruption and provide you, our employees and third parties, with clear guidance — by means of internal policies — on how to recognise and deal with issues concerning bribery and corruption.

In general, never offer, pay, seek, accept, promise, or authorise directly or indirectly any financial or non-financial advantage to/from someone with the purpose to influence a business outcome improperly, induce or reward improper conduct, induce the counterpart to take (or to refrain from taking) action or influence any commercial, contractual, regulatory, or personal decision. Keep in mind that any "facilitation payments" to speed up or secure routine government activities are strictly prohibited.

Moreover, do not engage in any actions that create the appearance of improper conduct. In particular, exercise caution when dealing with government or public officials or Public Exposed Persons (PEPs), as it may be a breach of law to offer, or to make a payment, or gift of any kind, in order to influence their decision-making or to induce them to do business with PTCL Group. In the event that you are asked to make an improper payment or become aware of any transaction that may involve an improper payment, report it promptly via the appropriate internal channels.



## 2. Know the rules on gift, entertainment, and hospitality

PTCL Group understands that in the usual course of doing business we may sometimes receive and provide some business courtesies, such as discussing a sales agreement over lunch or meeting with clients for dinner. PTCL Group's rules regarding receiving and providing gifts, entertainment and hospitality help you to identify acceptable business courtesies.

Remember, you should never ask for a gift nor offer or provide any gift to a person to influence their decision. Further, you should not accept any gift or favour if it might create a sense of obligation, or favouritism, or compromise your professional judgement or appear to do so. Any decision to accept a gift or entertainment must be able to withstand internal and external scrutiny without damaging PTCL Group's reputation.

In particular, a gift of money or monetary equivalent (including cash or cryptocurrency) should never be given or accepted. Transparency is the enemy of corruption, so if you receive, or intend to offer any gifts, entertainment, and hospitality, please ensure you seek appropriate approval and register this via the appropriate internal channels.

For more information on providing and receiving gifts, entertainment, meals, and hospitality in an acceptable manner, please consult PTCL Group's applicable internal policy in relation to gifts, entertainment, meals, and hospitality, which can be found on PTCL Group's internal network.

## 3. Avoid or disclose conflict of interest

A conflict of interest exists when our personal interest conflicts, or could be perceived to conflict, with PTCL Group's interests. Personal interests could be direct or indirect i.e., direct holding of a financial (investment), business opportunities, outside employment or the interests of people close to us, such as close family members, personal friends, or business associates' interest. Even the perception that we may not be acting in PTCL Group best interest can call into question our integrity and adversely affect our reputation. There is an indefinite number of situations that might constitute a conflict of interest and these situations are often unique. PTCL Group's internal policy shall help you to identify conflicts of interest and guide you on how to disclose, mitigate and resolve them, if possible. Be vigilant of any actions or relationships that create or even have the appearance of creating actual or potential conflicts of interest (involving either yourself or another employee) and disclose them promptly in an attempt to resolve them.

Employees are required to regularly declare any changes in their circumstances, either in the future or otherwise, which may result in actual or potential conflicts of interest. Failure to comply with PTCL Group's conflict of interest policy may result in disciplinary and legal action being taken wherever appropriate.





## 4. Following import, export, and trade compliance rules

For PTCL Group, it is essential to know and comply with the applicable sanctions, import, export, and trade laws that govern global trade of our goods, services, and technical information. Employees need to understand and comply with the regulations and restrictions on dealings with certain countries, entities, and individuals pursuant to national and international trade sanction laws that apply in the jurisdictions where PTCL Group conducts, plans to conduct business or procure goods, services, and technical information.

## 5. Data protection and data privacy

We, at PTCL Group, respect the privacy of our employees, customers and third parties, as well as of others with whom we conduct business. PTCL Group is committed to being transparent about how it collects, processes, and retains the personal data of its workforce and stakeholders (ensuring that personal data is processed in a fair and lawful manner), and to meeting its data protection obligations. Personal data includes, but is not limited to, employee, customer, and business partner information such as content of communications, phone numbers, e-mails, addresses, locations, call and payment history, salaries, and health information etc.

We handle personal data with due care, by implementing technical and organizational security measures to prevent accidental or unlawful destruction or disclosure of personal data and limiting the access of personal data to those who are appropriately authorized, in accordance with applicable laws and for legitimate business purposes only. We all have a role to play in protecting people's personal data. Make sure you understand your legal obligations under the applicable data protection laws. Ask a member of the Ethics and Compliance Department if you are unsure.

### Our responsibilities:

- Undertake data privacy and information security training annually.
- Be accountable for protecting personal data and stay informed about our personal data related policies.
- Promptly report any actual or suspected unauthorized uses, disclosures or access to your manager or member the Ethics and Compliance Department.
- Limit the collection and processing of personal data to legitimate business purposes in line with local laws and retain personal data only as long as needed and in accordance with PTCL Group's policies.
- Be transparent about our privacy practices and how individuals can contact PTCL Group with questions or concerns, or requests related to their data within our systems.
- Only share personal data with those who have a legitimate need to know and whose access is appropriately authorized.



## 6. Prevent money laundering

PTCL Group does not tolerate any form of money laundering or terrorist financing. Money laundering is a process whereby individuals or entities attempt to conceal or disguise the true nature, source or location of illegal funds or make them appear legitimate or use of legitimate funds to support criminal activity or terrorism.

You need to ensure that PTCL Group does not facilitate such activities. Therefore, everyone working for and with PTCL Group must know the origin of funds he/she receives or procures and the identity of the ultimate beneficial owner of these funds to whom PTCL Group makes payments to or receives payments from.

In this context, it is essential that you keep accurate books and records. Be watchful for any payments that look irregular or for customers who appear to lack integrity in their operations. PTCL Group believes in generating income and business through legal and fair means, we are against violating laws and regulations of Pakistan and strongly oppose all forms of money laundering.

## 7. Commitment to fair dealing

We deal fairly with our customers, business partners and competitors. We do not take unfair advantage of anyone through any misrepresentation, manipulation, concealment, misuse of confidential information, fraud, or other unfair business practice. We are truthful in our business dealings, treat our customers, competitors, and business partners fairly and respect their rights.

PTCL Group complies with applicable competition laws. Competition laws across the world prohibit anti-competitive agreements, abuses of dominance and certain other practices. Collusion, and agreements or discussions that give rise to competition concerns, such as price-fixing, market sharing and bid rigging, are always improper and can never be justified. You should never participate in these types of agreements or discussions, as they could result in legal liability and potentially large penalties.

## 8. Information integrity

All information you record or report on PTCL Group's behalf must be accurate and complete. All records, including accounts and financial statements, must be maintained in appropriate detail, reflect transactions accurately, and be kept in a timely manner.

You must follow all legal requirements and PTCL Group internal procedures for reporting information. It is essential to ensure that no undisclosed or unrecorded agreement, account, fund, or asset is established or maintained. All commitments or commercial arrangements on behalf of PTCL Group must be in writing and include all material terms representing the understanding or agreement between the parties.

You are expected to cooperate fully with Ethics and Compliance, Internal and External Auditors and provide them with accurate information. Concealing information from management or from Ethics and Compliance, Internal or External Auditors can cause serious damage to the financial integrity of PTCL Group and is strictly prohibited.



# Conflict of Interest



# Gift and Hospitality



Our business partner has extended an invitation for a conference and has offered to cover the expenses for first-class airline tickets.



... and hotel accommodation and provide a daily cash stipend for meals and entertainment



It may be permissible to accept conference, seminar or meeting invites from our business partners for legitimate business reasons. However, arrangements must be reasonable (first class ticket is not), necessary (spousal travel is not), and appropriate (cash stipends are not). In addition, you must obtain approval in advance by following the Gift & Hospitality Policy .

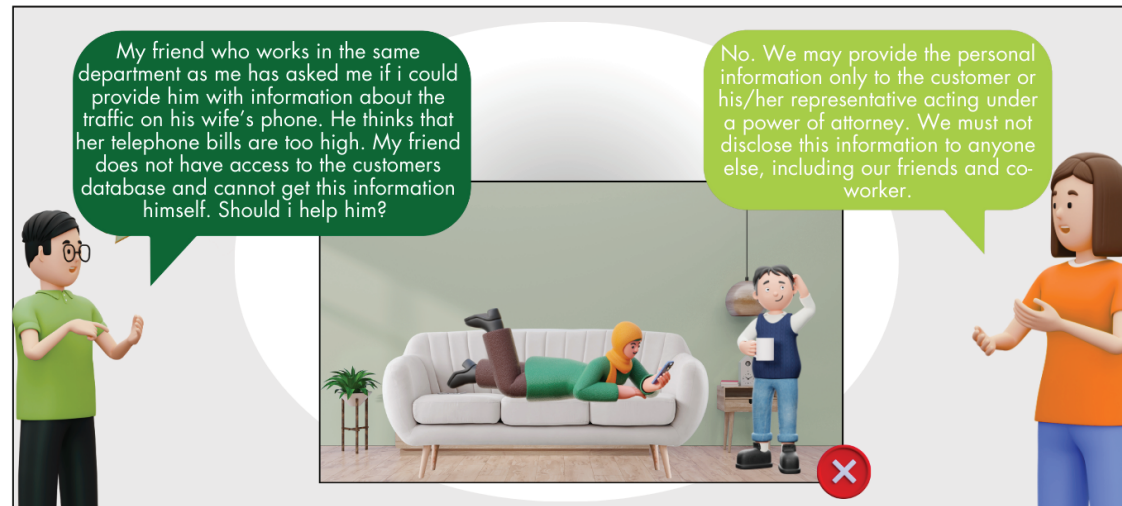


Plus, they have asked us to bring our spouses. Is this allowed?





# Privacy



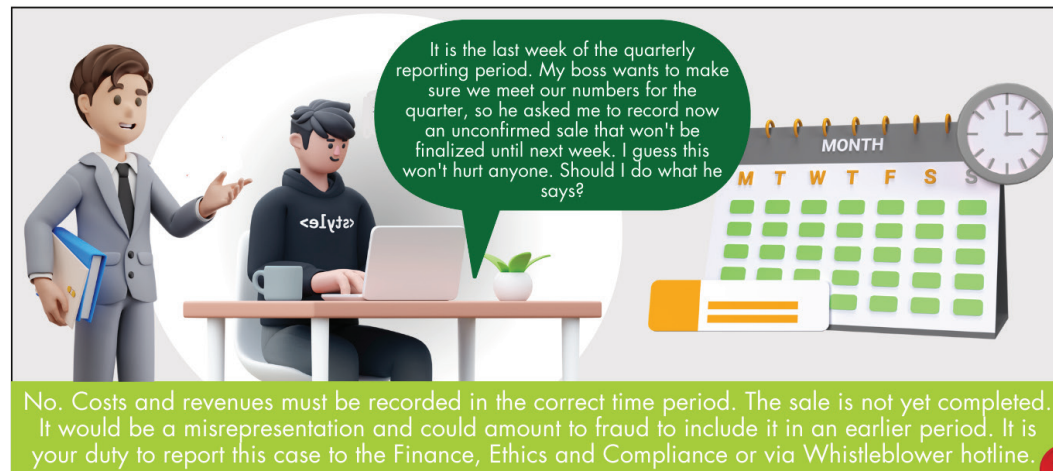
# Commitment to Fair Dealing



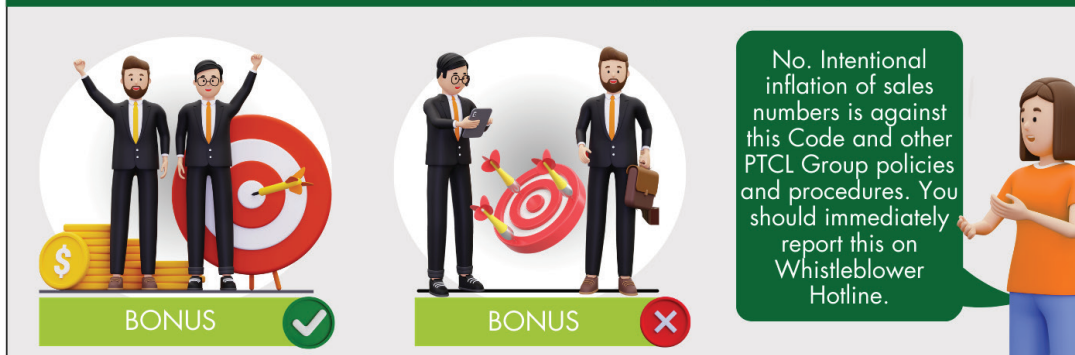
No. Exchanging competitive information is prohibited and could result in a legal violation. You must refuse to discuss financial results, pricing, trends and customer deals with competitors.



# Financial Integrity & Fraud



One of our business partners has narrowly missed the target sales required for eligibility for a bonus. The manager responsible for working with this business partner has decided to "round up" their sales results in order to ensure they receive the bonus. The manager argues that this partner is important to our business, and maintaining a good relationship necessitates awarding the bonus. However, the manager gains nothing personally from this action.







# MAKING GOOD POSSIBLE

# Making Good Possible

We aim to operate as good citizens conducting business with integrity, responsibility, and transparency. We are committed to making good possible by helping improve the lives of our colleagues, customers, and the communities and environment where we operate. We want to create an even better place to work to allow us to serve our customers even better and create a forward-looking and sustainable successful business.

## 1. Supply Chain

PTCL Group is committed to doing business responsibly with the highest standards of ethics and integrity. We expect our partners, suppliers, consultants, contractors, agents etc. to apply the same standards. To ensure that PTCL Group works with the right third parties and to protect our brand and reputation, we conduct a thorough registration, selection, due diligence, and engagement process in accordance with our internal policies, prior to onboarding or engaging any suppliers. We work closely with each of them to make sure they follow our requirements in their operations and supply chains.

We have a Business Code of Conduct in place, which sets out our supplier responsibilities and obligations towards ethical procurement and human rights. All of our suppliers are encouraged to ensure their own suppliers and subcontractors are made aware of the principles of the Business Code of Conduct when undertaking any work, or providing any product or service to, or on behalf of PTCL Group.

We do this to responsibly manage the wider impact our business has on communities, society, and the environment. We are committed to ensuring all workers in our supply chain receive fair and equal treatment in full compliance with the laws, rules, and regulations of the countries in which it conducts businesses and operations. If you suspect that a supplier has breached the Business Code of Conduct, you should contact the procurement team or alternatively use the Speak Up process to escalate your concerns.



## 2. Human Rights

We understand that while governments and national authorities have the duty to protect the human rights of their citizens, businesses including PTCL Group have a responsibility to respect human rights and to ensure we do not infringe these rights in our business operations.

We respect all internationally proclaimed human rights, including the International Bill of Human Rights and the principles concerning fundamental rights set out in the United Nations Guiding Principles on Business and Human Rights throughout our business operations.

We strive to ensure that we are not complicit in human rights abuses and seek ways to honour the principles of internationally recognised human rights. PTCL Group does not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labour), physical punishment, forced or prison labour or human trafficking.

We are committed to ensuring all workers in our supply chain receive fair and equal treatment in full compliance with the laws, rules, and regulations of the countries in which it conducts businesses and operations. We strongly prohibit the use of any form of forced bonded, compulsory labour, physical punishments, slavery, or human trafficking in any part of our supply chain.

If you suspect a supplier has breached the Business Code of Conduct or our principles on human rights, you should contact the procurement team or alternatively use the Speak Up process to escalate your concerns.

## 3. Environment

Everyone who is working for and with PTCL Group is expected to integrate environmental considerations in their day-to-day operations and strive for continuous improvement, by minimizing any adverse effects of their operations on the environment. We commit to protecting the environment and minimizing the use of finite resources (such as energy, water, and raw materials) and the release of harmful emissions to the environment (including waste, air emissions and discharges to water). We comply with relevant national and international legislation and standards.

We work with customers, suppliers, and contractors to develop products and services to minimize the impact we have on the environment and maintain stakeholder confidence by being open and responsive to the concerns of customers, regulators, and the local communities.



### You can do your part to support our PTCL Group commitments to the environment by:

- Reducing waste energy, and emissions to air and water.
- Handling chemicals in an environmentally safe way.
- Handling, storing, and disposing of waste in an environmentally safe manner.
- Contributing to the recycling and reuse of materials and products.
- Avoiding unnecessary travel to reduce your carbon emissions by using video conferencing where possible.

## 4. Corporate Social Responsibility

We are committed to being responsible members of the community and promoting sustainable growth through social investments and charitable donations. However, we do not make donations of any type, either in cash or in kind, to political parties, organizations, factions, or movements of public or private nature, whose activities are clearly linked with political or religious agendas.





ETHICAL  
DECISION-MAKING

# Ethical Decision-Making

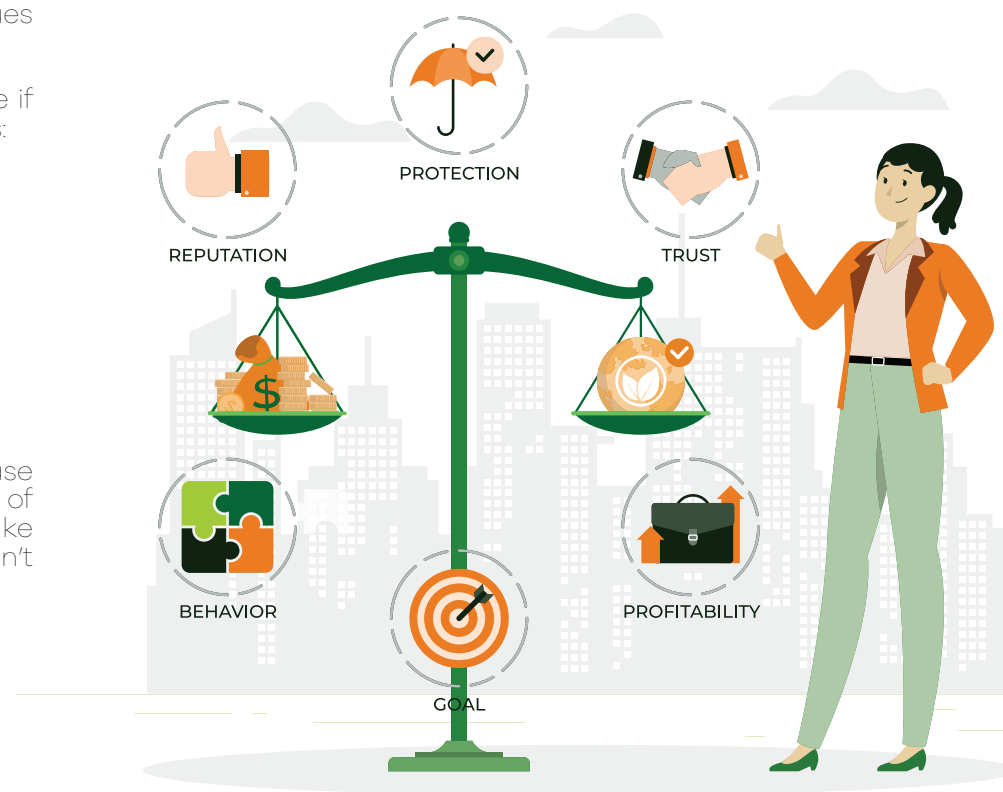
Our Code is a great resource to provide you with an overview of the legal, regulatory, and ethical rules and standards essential to achieve PTCL Group objectives and uphold its values.

Our Code is not a substitute for your good judgement; it is not designed to cover every possible scenario you may encounter; it is down to you to put these values and behaviours into action.

When faced with tough choices or grey areas, to help you or your team decide if you're making the right decision, you should ask yourself the following questions:

- Is this legal and ethical?
- Is this in line with our Code of Conduct?
- Is this right for our customers and the community?
- Am I treating others the way I would want them to treat me?
- Would you be proud to tell others about your actions?

If you answer 'no' to any of these questions, or if it is still unclear what to do, please ask for advice at [compliance@ptclgroup.com](mailto:compliance@ptclgroup.com) or consult the respective section of our Code or compliance handbook or relevant policy. Remember you should take action once you have made a decision. If you see an issue or something that isn't right – don't stand by, and if you are unsure what to do, please ask for advice.





# SPEAKING UP



# Speaking Up

At PTCL Group, we are committed to the highest possible standards of openness and accountability. If you suspect anything illegal or unethical, we expect and encourage you to immediately report such suspicions, because any deviations from or violations of the Code are not accepted by PTCL Group. We take reports of wrongdoing very seriously.

There are a number of ways for you to **“Speak Up”** and raise your concerns at PTCL Group:

Speak to your line manager as your first point of contact – we encourage you to consult with your line manager on any issue first

Speak with Ethics & Compliance on any questions you may have regarding the application of our Code of Conduct

You can also raise a concern or complaint on fraud or misappropriation in confidence via the official whistle-blower email [wb@ptclgroup.com](mailto:wb@ptclgroup.com)

If you are not sure how a particular section of our Code relates to any issue you may be experiencing, please reach out to [compliance@ptclgroup.com](mailto:compliance@ptclgroup.com).

Raise a concern with a Business Growth Partner.

In case of sexual harassment complaint you can contact [anti.harassment@ptclgroup.com](mailto:anti.harassment@ptclgroup.com)

You can raise a grievance on Meri Awaz portal or email [meriawaz@ptclgroup.com](mailto:meriawaz@ptclgroup.com)



All reports will be kept confidential to the extent it is practical, except where disclosure is required by applicable law or court order. For more information, kindly refer to the internal policies that PTCL Group has in place. We appreciate those who speak up. Asking a question or reporting a suspicion shows that you are trying to **#DOTHERIGHTTHING**

Remember that you have the right to remain anonymous, so your identity does not need to be revealed. Should you wish to disclose your name, however, and subsequently experience any form of retaliation or harassment, PTCL Group will investigate and take appropriate action.

## 1. Zero tolerance for retaliation

You should feel free to report any suspected violation of the law, internal policies of PTCL Group or this Code without fear of retaliation or any negative impact on your relationship with PTCL Group. Retaliation in any form, in response to a report for raising a concern, filing a report, or cooperating in an investigation is completely unacceptable and undermines the purpose of our Code of Conduct. Anyone who, in good faith, raises a question or files a report about a suspected violation or noncompliance of our Code shall be protected against any acts of retaliation even if the issue or report is ultimately unsubstantiated.

Retaliation against anyone who, in good faith, participates in any investigation likewise is prohibited. If you believe you have suffered retaliation or reprisal, report the matter to Human Resources or Ethics and Compliance Function or utilize the Meri Awaz portal or the PTCL Group whistleblower reporting service immediately.

## 2. False or malicious allegations

If it is found that an individual has used PTCL Group internal policies and the procedures in our Code to make deliberately false and/or malicious allegations about a colleague or manager, or as a form of bullying against a colleague or manager, this can be treated as misconduct, and in serious cases can justify dismissal.



# Speaking Up

What happens when i raise concern on official Whistleblower hotline?



We'll do our best to help you!

When you email PTCL Group official Whistleblower hotline, your report, question, or concern will be handled with strict confidentiality. We make every effort to respond promptly to all reports or concerns.



I have been thinking about reporting a concern on Whistleblower hotline, but I'm not sure if I should. My line manager told me to do something that I feel is not right and may even be illegal. I think I should tell someone, but I'm afraid that my line manager will make my job difficult for me if I do. What should I do?



Even in great companies, people sometimes do things they shouldn't. You have identified what you believe is a potentially serious matter. The Code says that if something does not feel right, you need to speak up. If you are not comfortable speaking to your line manager, speak to Ethics & Compliance Team or email on Whistleblower hotline. PTCL Group will consider the situation and will not tolerate your line manager or anyone else retaliating against you. The right thing to do is report your concerns.

# Zero Tolerance for Retaliation





# FREQUENTLY ASKED QUESTIONS (FAQs)

# Frequently Asked Questions (FAQs)

## How am I expected to use our Code of Conduct?

We expect you to behave in an ethical manner in your actions and decisions. This means complying with the principles and rules in our Code of Conduct and fulfilling your legal and regulatory obligations. Take the time to understand our PTCL Group values and use the principles set out in our Code in your day-to-day work. Speak up if you feel a working practice is not ethical or safe or if it breaches our Code.

## Where can I find all the policies referred to in our Code of Conduct?

All supporting policies and further information can be found on People Care Hub. If you cannot locate the policy, you are looking for, please reach out to [compliance@ptclgroup.com](mailto:compliance@ptclgroup.com) or speak to your line manager who will guide you or provide you with a copy.

## What is the whistleblower hotline?

If you feel uncomfortable speaking to your line manager or someone else at work about any issue or concern, you can always raise your concern at [wb@ptclgroup.com](mailto:wb@ptclgroup.com) and report issues, concerns or behaviour that you believe is not in line with our Code of Conduct or established standards of behaviour.

## If I email the whistleblower hotline anonymously, will I get into trouble?

You can email the hotline anonymously without facing any consequences, however you should remember if you do not leave your name, it may hinder the ability to effectively conduct an investigation and ask you for follow up information. We encourage you to leave your name if it will help resolve the issue and we assure you that your concerns will be handled confidentially and dealt with in a fair and balanced way.

## Where can I lodge my complaint about sexual harassment?

You can email the hotline [anti.harassment@ptclgroup.com](mailto:anti.harassment@ptclgroup.com) or directly contact any member of the PTCL Group's Standing Committee on Anti Sexual Harassment without any fear of facing any consequences.

## Where can I lodge my grievance?

You can raise your grievance through PeopleCare Experience Hub or email the hotline [meriawaz@ptclgroup.com](mailto:meriawaz@ptclgroup.com).

