

Company Code of Conduct

Naseem Bukhari Pvt. Limited

Effective Date: 01-Jul-2024

1. Introduction

At **Naseem Bukhari Pvt. Limited**, we are committed to conducting our business with the highest standards of integrity, professionalism, and accountability. Our Company Code of Conduct serves as the cornerstone of ethical decision-making and responsible behavior for all employees, officers, directors, contractors, and third-party representatives who act on behalf of the company.

As a sourcing and trading partner in the renewable energy, energy transition, and critical minerals sectors, our operations span regions, cultures, and regulatory landscapes. The Code reflects our unwavering commitment to responsible business conduct, environmental and social stewardship, and compliance with all applicable laws and international standards.

This document outlines the fundamental principles and values that govern our daily operations and long-term strategic decisions. Every employee, regardless of role or seniority, is expected to read, understand, and uphold this Code in every aspect of their work.

2. Scope and Applicability

This Code applies to:

- All permanent and temporary employees of **Naseem Bukhari Pvt. Limited**;
- The Board of Directors and executive management;
- Agents, contractors, consultants, and any third parties representing or acting on behalf of the company.

It is mandatory that all parties covered by this Code commit to the ethical expectations described herein and seek guidance in case of uncertainty or ethical dilemmas.

3. Our Core Values

The principles outlined in this Code are rooted in the core values of **Naseem Bukhari Pvt. Limited**:

- **Integrity:** We act with honesty, consistency, and in accordance with the highest ethical standards.
- **Responsibility:** We hold ourselves accountable for our actions and their consequences, especially in terms of environmental, social, and economic impact.
- **Transparency:** We believe in open, accurate, and timely communication with stakeholders.
- **Respect:** We treat colleagues, clients, communities, and the environment with dignity and fairness.
- **Innovation:** We continuously strive to improve our performance and our contributions to the global energy transition.

4. Ethical Business Practices

4.1 Compliance with Laws and Regulations

All employees must comply with applicable local, national, and international laws, including trade, customs, labor, environmental, anti-bribery, anti-money laundering, and export control regulations. Ignorance of the law is not an excuse and violations can lead to serious consequences for both the individual and the company.

4.2 Financial Integrity and Accuracy

All business records, accounts, and financial statements must be maintained in a complete, accurate, and transparent manner. Falsifying records or misrepresenting facts is strictly prohibited.

4.3 Avoiding Bribery and Corruption

Naseem Bukhari Pvt. Limited has zero tolerance for bribery or corrupt practices. Offering, giving, soliciting, or accepting any form of bribe or improper payment is prohibited under all circumstances.

4.4 Conflict of Interest

Employees must avoid situations where personal interests conflict with their duties to the company. Potential conflicts must be disclosed promptly and managed transparently.

4.5 Gifts and Hospitality

While modest gifts and business courtesies may be acceptable in certain cultures, employees must avoid anything that could be seen as influencing a business decision.

Lavish gifts or hospitality must be reported and approved in line with internal guidelines.

5. Respect in the Workplace

5.1 Diversity and Inclusion

We value diversity in all its forms and are committed to providing a workplace free from discrimination, harassment, or bullying. Employment decisions are based on qualifications, merit, and business need.

5.2 Human Rights

Naseem Bukhari Pvt. Limited supports and respects internationally recognized human rights standards. We prohibit forced labor, child labor, and any form of modern slavery within our operations and supply chains.

5.3 Health and Safety

The health and safety of our people are paramount. We maintain safe workplaces and implement preventive measures to avoid injury or illness. Employees are responsible for reporting unsafe conditions and adhering to safety protocols.

6. Confidentiality and Data Protection

Employees are expected to protect sensitive and proprietary information belonging to **Naseem Bukhari Pvt. Limited**, its clients, suppliers, and partners. Unauthorized disclosure, use, or sharing of confidential data is strictly prohibited.

7. Use of Company Assets and Resources

Company assets, including physical property, digital systems, and intellectual property, must be used responsibly and only for authorized business purposes. Misuse or theft of company assets will result in disciplinary action.

8. Environmental and Social Responsibility

As a company working at the forefront of the global energy transition, we are committed to reducing environmental impact and promoting socially responsible business practices. All employees are expected to:

- Minimize waste and conserve resources;
 - Support ethical sourcing and responsible supply chains;
 - Contribute positively to the communities in which we operate.
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9. Reporting Concerns and Whistleblowing

Naseem Bukhari Pvt. Limited encourages employees and partners to report concerns about unethical or illegal conduct in good faith. Reports can be made anonymously and without fear of retaliation. The company will investigate all reports promptly and take appropriate action.

Reporting channels include:

- Direct communication with supervisors or HR;
- Email to [whistleblowing@naseembukhari.com];
www.naseembukhari.com

- Use of anonymous reporting tools, where available.
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10. Breaches and Disciplinary Action

Any breach of this Code will be treated seriously and may lead to disciplinary action, up to and including termination of employment or legal prosecution. Business partners and contractors who violate the Code may be subject to termination of contracts and partnerships.

11. Continuous Improvement and Review

This Code will be reviewed regularly to reflect changes in the law, business practices, and stakeholder expectations. Employees will be notified of any updates, and refresher training may be provided as required.

Acknowledgement

All personnel must sign an annual declaration confirming that they have read, understood, and will adhere to this Code of Conduct.

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