

Employ Code of Conduct Manual

2023



Version 1.0

Document History

Date & Approval Ref	Version	Issues Addressed	Description of Change *

*Any changes in text/expression/entitlements/limits/policy or procedures through amendment or revision or review after due approvals are the examples of Description of Change and have to be recorded in chronological order.

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Scope and Applicability

- These policies are equally applicable to the staff and consultants being directly paid by MDF as well as the staff and consultants being paid by executing entities using MDF funds¹
- Code of conduct is a bunch of statements and descriptions of required behaviors, responsibilities, and actions expected from the employee of MDF. MDF Code of Conduct focuses on professional, legal, ethical, and social behaviors and is applicable to all employees without any discrimination. MDF Code of Conduct provides guidance to employee in their social, personal and professional life that how to act in cases of doubt or confusion.
- This Code of conduct is not exhaustive and may not anticipate every situation which may morally, ethically, professionally, legally compromise the employees or MDF interests. In this regard MDF expects its employees to use their common sense and sound judgment. However, compliance with this Code is a mandatory obligation owed by all employees to each other and to MDF. Breach of this Code or any requirements mentioned in these Rules will result in disciplinary action and may lead up to and including summarily dismissal or other appropriate disciplinary actions.
- This Code of conduct provides firm, uncompromising standards for each employee in dealings with each other, communities, and stakeholders. The code re-emphasizes and provides further guidance regarding policies which are an integral part of MDF's operating philosophy.
- MDF is committed to the highest standards of conduct in public and to meet this commitment, MDF has issued this code of conduct applicable to all employees across all departments and regions and to align employees conduct with the organizational values and ethics that reinforce MDF vision, mission, values, procedures and policies.
- Every employee must conform to and abide by the applicable laws, rules and regulations and orders of the organization, and shall observe, comply with and obey all lawful orders and directions which may be given to him, from time to time, by any person or persons under whose authority or supervision, he / she is working.
- All MDF employees are bound to follow this code of conduct, irrespective of their age, gender, contract type or ethnic background and to perform their duties effectively and provide impartial and accurate advice and act in an open, transparent, equitable and inclusive manner that promotes a productive and harmonious working environment.

CODE OF CONDUCT POLICIES

- All employees of MDF are required to conduct their behavior within the laid down behavioral standards as communicated to them from time to time. To facilitate employees to maintain a healthy and cooperative working environment, MDF provides different platforms and mechanism to address and resolve their issues. This section of chapter provides details of all those policies and standards that are intended to provide guidelines and parameters based on which employee's behavior will be judged and aligned.
- In order to effectively communicate these standards, it is the responsibility of HR Department to provide a copy of Code of Conduct to all new joining employees and take their undertaking by getting it

signed from them. Employees are required to provide their undertaking by signing the Declaration of Commitment after carefully understanding their obligations and MDF code of conduct mentioned in it.

Equal Employment Opportunities

- MDF shall provide equal employment opportunities to qualified individuals regardless of race, color, ethnicity, caste, gender, origin, ancestry, religion, age, disability, or marital status in consistent with laws of the Islamic Republic of Pakistan.

Harassment at Work

- MDF fully complies with the Protection against Harassment of Women at Workplace Act, 2010. As per Clause 1 of this act, Sexual Harassment is defined as any unwelcome sexual advance, request for sexual favors or other verbal or written communication or physical conduct of a sexual nature or sexually demeaning attitudes, causing interference with work performance or creating an intimidating, hostile or offensive work environment, or the attempt to punish the complainant for refusal to comply to such a request or is made a condition for employment, is unacceptable behavior in the workplace, including any interaction or situation that is linked to official work or official activity outside the office. All such acts are a violation of this Act and MDF policies.
- MDF's policies prohibits any behavior on the part of an MDF employee which constitutes any form of sexual misconduct, including sexual harassment, sexual exploitation, and sexual violence towards any other staff member, client, beneficiary, or other individual participating in a MDF activity. Retaliation for reports of sexual misconduct is strictly prohibited and will not be tolerated; Sexual misconduct and/or retaliation of any kind will result in termination of employment. For the purposes of this policy, (MDF) employees include international staff, national staff, volunteers, interns' consultants, temporary employees, field staff or temporary contractors. MDF is committed to providing a work environment that is free of discrimination and unlawful harassment. Actions, words, jokes, or comments based on an individual's sex, race ethnicity, age, religion, or any other legally protected characteristics are not acceptable. As an example, sexual conduct (both overt and subtle) is a form of employee misconduct that is demeaning to another person, undermines the integrity of the employment relationship, and is strictly prohibited.
- Reporting methods and mechanisms and circumstances under which harassment cases are to be dealt with are explained in detail under Chapter 5 of this manual.

Abuse and Violence

- MDF requires all of its employees to abstain/refrain from any sort of child abuse which could be physical, sexual and emotional abuse, and neglect forms. Child labor as per law is strictly prohibited. Violence against any person, property or organization in any form including but not limited to assault or battery is prohibited.

political, Non-Sectarian Policy

- MDF is a non-sectarian and apolitical organization working across Pakistan without regard to sectarian or political considerations in areas where we work. It is, therefore, necessary for all MDF employees, both individually and collectively, to abstain from any activity that may be perceived as aligning them or MDF for or against a sectarian or political cause, issue or faction.
- Adherence to this policy is one of MDF major strengths; it underpins much of our effectiveness and is a condition for assignment to any MDF position. Employees at all levels are required to comply with this policy in order to preserve and enhance this organization's reputation and effectiveness.
- Individuals may, of course, speak out as individuals on matters of personal concern, and this policy in no way abrogates that right. Care must be taken, however, to assure that such statements are neither made, nor are likely to be interpreted as being made, on behalf of MDF. For example, MDF stationery should never be used in making personal statement.
- In politically sensitive situations, Employees must be acutely aware of how their words and actions impact those around them, as whatever they say or do, will very likely be interpreted as reflecting MDF position. Each staff member must, therefore, exercise prudence, common sense and sensitivity in assessing each situation carefully before speaking out in sensitive situations.

Use of MDF's Property

- General framework regarding the use of MDF properties will be as follows, however specific policies relating to a specific area will take precedence.
- The services, goods, materials, technology and equipment provided to MDF employees are the property of MDF or are rented and/or licensed by and for the benefit of MDF. As such, the services, goods, materials, technology, and equipment provided are to be used primarily for business-related purposes.

Privacy and Monitoring: -

- Employees should not assume that official electronic communications (including, but not limited to, official e-mail, official voicemail, and office fax machines) are private and confidential. Although employees have individual access passwords to e-mail, voice mail and computer network systems, along with the ability to delete messages, these systems and materials are accessible by MDF.
- Employees should be aware that any communications, material and/or data created, sent, received and/or stored on MDF's computer network or communications systems (including e-mail messages and voice mail) are also the property of MDF. MDF expressly reserves the right to intercept, read, review, access and disclose, as it deems necessary, any communications, material or data that is created, sent, received and/or stored on MDF's computer network or communications systems (including e-mail messages and voice mail).

Every time an employee or agent of MDF uses or logs-on to a MDF provided computer or other communication system or network s/he is consenting to such an action by MDF.

Prohibited Uses of MDF Property:

Employees will not use any services, goods, materials, technology and/or equipment provided by or paid for by MDF for illegal, inappropriate, or otherwise disruptive activities, or in support of such activities.

Workplace Behavior

In accordance with the mission and principles of applicable local laws and codes of conduct, all MDF staff, including both international and national, regular full and part time staff, interns, contractors, consultants, and volunteers, are responsible for promoting fundamental human rights, social justice, human dignity, and respect for the equal rights of men, women, and children. While respecting the dignity and worth of every individual, MDF staff must treat all persons without distinction on the basis of an individual's race, gender, religion, color, national or ethnic origin, marital status, sexual orientation, age or disability.

As representatives of MDF, all employees must conduct all MDF related activities honestly, with integrity and in the best interest of the organization and communities MDF serves. Employees are expected to demonstrate a standard of conduct that upholds the reputation of MDF and is respectful of the rights of others and the standards of the communities in which MDF works. Employees must act in conformity with applicable laws, regulations, and standards common to employees of other charitable organizations, non-profit corporations, non-governmental agencies, and governmental agencies.

MDF staff commit that they will: -

- a. Always strive to treat all persons with respect and courtesy in accordance with applicable international and national conventions and standards of behavior.
- b. Never intentionally commit any act or omission that could result in physical, sexual or psychological harm to the beneficiaries we serve, or to their fellow workers.
- c. Not condone or intentionally participate in corrupt activities or illegal activities. While respecting and adhering to these broader frameworks of behavior,
- d. Employees shall deal with co-workers, peers, clients and everyone they come into contact with during the performance of duty in a courteous and professional manner. In case of inability to report for work, employees will, in good time, inform their supervisor as to the reason. Every individual using MDF premises, facilities or property will make an effort to keep them clean.

Reporting Change of Status

Employees will notify their supervisor and the Human Resource Department whenever there is a change in their situation, such as marriage, birth of children, new address, nationality, or other such matters that may affect their employment or benefit status.

Work Credentials

Employees are responsible for obtaining and renewing any license, certificate, permit, or other credential required in performing their job. Moreover, employees are required to report the loss or revocation of any credential to their supervisor immediately. Failure to report shall result in disciplinary action.

Work Interruption

Employees shall not unduly restrict or interrupt work or interfere with the work of others. However, they shall remain at work only when able to safely perform their job duties. Employees will notify their immediate supervisor whenever there is cause to stop work, be absent, late, or leave early.

Personal Conduct at Workplace

An employee shall not engage in any conduct which interferes with the proper performance of another employee's duties.

- a. No employee shall harass, discriminate, or retaliate against any other employee or any member of society.
- b. No employee shall be insubordinate, which is failure to obey a direct lawful order of a supervisor or someone higher in responsibility or authority.
- c. Employees shall not engage in negligent or careless behavior or unsafe practices which endanger the employee, other employees, or members of the public.
- d. Employees shall not abuse legitimate grievance processes resulting in repeated unsubstantiated claims.
- e. Employees shall make themselves available and fully participate in all administrative inquiries with completely honesty. All employees shall immediately notify their supervisor or appropriate management representative following any accident.
- f. No MDF employees shall solicit anything of value from a citizen or business for services that the MDF is expected to provide.
- g. No MDF employees shall use his or her position to coerce or abuse another person.
- h. Employees shall not remove MDF property from its assigned place for personal use. Defacing or destroying property is vandalism and shall be dealt with strictly.
- i. Employees shall not fight, engage in unbecoming acts, display rude behavior, use abusive language, physically or sexually assault another person, gamble or make threats while on duty or on MDF premises.
- j. Employees shall not engage in unapproved soliciting or any partisan political activity at work.
- k. Employees shall not place or display non-official notices in MDF premises without prior written approval from the appropriate authority.
- l. Employees shall not possess unauthorized weapons, illegal drugs, or alcohol on MDF premises.
- m. No employee of the MDF shall directly or indirectly engage in any occupation or business, or act in any other capacity with other concerns, or have private dealings or business relations with any outside agency, unless specifically permitted to do so by the CEO/GM, who may in exceptional circumstances, permit such undertakings. To get such permission, an employee seeking approval will give an undertaking that the assignment will in no way have any effect on the MDF program.

- n. No employee shall take part, subscribe in aid of, or assist in any way, any political movement in Pakistan.
- o. No employee shall bring, or attempt to bring, political or other outside pressure/influence, directly or indirectly, to bear on the authorities/superior officers, or other staff, or indulge in pamphleteering, contribute articles, or write letters to newspapers anonymously, or in his own name with the intent to malign the Competent Authority, or his senior officers, or to act in an adverse manner relating to his appointment, promotion, transfer, punishment, or for any other condition of service of employment.
- p. No employee shall canvass, or otherwise interfere, or use his influence, in connection with, or take part in any election to a legislative body, except exercise the right to vote.
- q. No employee shall accept any gift or award from any individual or institution without prior written approval of the GM.

Drug and Alcohol Policy

It is MDF's policy to maintain a drug-free workplace. The use of controlled substances or being under the influence of controlled substances while performing services for MDF is inconsistent with the behavior expected of employees, subjects all employees and visitors to MDF offices to unacceptable safety risks, and undermines our ability to operate effectively and efficiently.

Policy

- a. The unlawful manufacture, distribution, dispensation, possession or use of illegal drugs or controlled substances on MDF premises or other work locations or while otherwise working or on MDF business, including while driving MDF vehicles or driving on MDF business, is prohibited.
- b. The use or possession of alcohol on MDF premises or other work locations or otherwise while working or on MDF business, including while driving MDF vehicles or driving on MDF business, is strictly prohibited. Reporting to work and/or working under the influence of illegal drugs, controlled substances or alcohol is prohibited.
- c. Any employee who is convicted under any criminal drug statute for a violation committed or occurring in the workplace must notify the CEO/ GM/RGM, Human Resource Department within five (5) days after such a conviction; any such conviction may be deemed a violation of this policy.

For any violation of this policy, MDF in its sole discretion, may subject the offending employee to disciplinary action, up to and including immediate termination of employment.

Outside Employment or Consulting

No employee shall engage in any unapproved outside employment or business activity that conflicts with his or her employment with MDF. The CEO/GM must approve any outside employment, including short-term

consultancies, private professional practice or fee-for-service engagements for full-time employees. Further, no employee or their family member may have, directly or indirectly, a significant financial interest in, involvement with or obligation to, any business organization which does or seeks to do business with MDF, unless the interest or obligation has been fully disclosed in writing to the employee's supervisor and CEO and it has been determined that the employee's duties for MDF will not require him/her to make decisions or take actions that could be influenced by such interest, involvement or obligation. Any financial interest in, involvement with or loan from an organization that might influence the judgment or action of an employee in the conduct of MDF's activities will be considered "significant".

In addition to the potential for a conflict of interest arising from an employee's service with another organization, a conflict of interest may also arise if a family member becomes eligible for a significant benefit, such as commissions or bonuses, from the other organization (even in the absence of a financial interest in that business organization) if it does business with MDF.

Public Statements on Behalf of MDF

Only the CEO, the designated MDF spokesperson or legal advisors holding a brief from MDF are authorized to make public statements on behalf of the MDF. These individuals may authorize others verbally or in writing to speak on behalf of the MDF. No MDF employee will make a public statement on behalf of the MDF on a matter involving litigation or confidential personnel matters without express authority to do so from the CEO. MDF employees will direct media inquiries to the appropriate authorized person.

CONFLICT OF INTEREST IN GENERAL

Under guidance of the Board of Directors, management of the organization and its employee and beneficiaries are primarily responsible for ensuring sustainability of the program. Being a non-profit organization, it is very important that all its resources are carefully utilized for the growth of the organization.

All the stakeholders view MDF as a public trust and consequently, there exists between MDF and its Board, officers, employees, and the public a fiduciary duty that they collectively have the responsibility of administering the affairs of MDF honestly and prudently by exercising their best skill and judgment for the benefit of the program. These persons are expected to exercise utmost good faith in conducting business and performing their duties, and they shall not use their positions or knowledge gained thereof for personal benefit.

Purpose

To set out the company's objectives and its responsibilities to various stakeholder, and ethical standards required from its directors and employees to meet such objectives and responsibilities, and in order to safeguard the company's reputation and its creditability, all directors and employees must conduct themselves in accordance with the highest ethical standards and be perceived to be acting ethically at all times and they should avoid any conflict between their own interest and the interest of the company.

Scope

The policy covers all the, officers, and management employees engaged in conducting the business of the MDF and performing their duties.

Terms and Definitions

- a. The terms 'Conflicting Interest' may be defined as an interest, direct or indirect, with any person(s) firm(s) or company(s) having business with the MDF and such interest might arise

through:

1. Owning stock or holding debt or other proprietary interests in any third party dealing with MDF.
2. Receiving remuneration for services with respect to individual transactions involving the MDF.
3. Using MDF's time, personnel, equipment, supplies, or goodwill and other resources for activities, programs, and purposes not approved by the MDF.
4. Receiving personal gifts or loans from third parties dealing or competing with the MDF.
5. Acceptance of any gift of such value that can influence a decision.

b. The term "affiliated persons" apply to and include two the following parties:

1. Your spouse, domestic and international partner, child, mother, father, brother, or sister.
2. Any corporation or organization of which you are a board member, an officer, a partner, participant in management or are employed by, or are directly or indirectly, a debt holder or the beneficial owner of any class of equity securities; and
3. Any trust or other estate in which you have a substantial beneficial interest or as to which you serve as a trustee or in a similar capacity.

c. Other terms relevant to the policy are defined as under:

1. "Responsible Person" is any person serving as an officer, employee, or a member of the board of directors of MDF.
2. "Family Member" is a spouse, domestic partner, parent, child or spouse of a child, or a brother, sister, or spouse of a brother or sister, of a Responsible Person.
3. "Contract or Transaction" is any agreement or relationship involving the sale or purchase of goods, services, or rights of any kind; receipt of a loan or grant; or the establishment of any other pecuniary relationship.

d. Parties with whom a conflict may arise

Conflicts of interest may arise in relation to directors, officers, and employees with any of the following third parties:

1. Individuals, firms and companies supplying goods and services to MDF.
2. Individuals, firms, and companies from whom MDF leases property and equipment.
3. Competing or affinity Organizations.
4. Donors and other Organizations supporting MDF.
5. Individuals, firms, and companies with whom MDF is dealing or planning to deal in connection with:
 - Contract of project implementation.
 - Purchase or sale of real estate, securities, or other property.
 - Any other business deals.
6. Agencies, Organization, and associations affecting the operations of MDF.
7. Family members and friends, having direct or indirect interest.

The areas of conflicting interest listed above and the relationships within those areas which may give rise to conflict are not exhaustive, and conflicts might arise in other areas or through other related parties as well. The conflict resolution will be made by the component authority.

DISCLOSURE POLICY AND PROCEDURE

- i. Consultants and employees of the company must recognize that while performing their duties, they may be put into a position where there is a conflict in the performance of such duty and personal interest. Such interest may be financial or may be based on their position or standing with any third party or entity. Such interest may not be held directly by the director/officer or employee but may be held by his friend or family member. It is the overriding intention of the company that all business contracts/ transactions be conducted at an arm's length basis.
- ii. Accordingly, this policy requires that all such responsible persons should avoid any conflict between their own interests and the interests of the company in the conduct of their professional responsibilities and their personal affairs, including transactions in the shares of the organization, or any other company or entity having or likely to have a business relationship with the MDF.
- iii. It is the policy of the Board that the existence of any of the interests described in the policy shall be disclosed before any transaction is consummated. It shall be the continuing responsibility of the Board, officers, and management employees to scrutinize their transactions and determine outside business interests and relationships for potential conflicts and to immediately make such disclosures.
- iv. If at any time a director or an employee becomes aware of an existing or a potential conflict between his professional responsibilities and his personal interest, he should, if he is a director, report this in writing to the Board of Directors, or, if he is an employee, to his immediately senior officer. The company shall then strive to determine whether such a conflict of interest in duty does exist. If there is a positive determination: then the director/employee should take such measures as the MDF may direct to remove such a conflict.
- v. In case a CEO is violating the Code of Conduct, Conflict of Interest Policy or the Disclosure Policy, the matter will be referred to the Chairman of the Board for constituting a special committee for enquiring into the matter and recommending an appropriate action commensurate to the material consequences of the violation.
- vi. All other cases of HR policies'
 - violation will be referred to the respective authority or Human Resource and Grievance Committee.
 - Directors and employees of the organization must recognize that it is an essential component of their office / employment that they are able to take independent decisions in the best interests of the organization without being perceived as yielding to their personal interests.
- vii. Each director and employee must avoid any investment, interest, or association that interferes or might interfere with the independent exercise of his or her own individual best judgment, and with such director's/ employee's obligation to perform his or her responsibilities in the best interests of the organization.
 - a. The Board or its duly constituted committee shall determine whether a conflict exists and in the case of an existing conflict, whether the contemplated transaction may be authorized as just, fair, and reasonable to be undertaken. The decision of the Board or its duly constituted committee on these matters will rest at their sole discretion, and their concern must be the overall interest of MDF and the advancement of its purpose.
 - b. Transactions with parties with whom a conflicting interest exists may be undertaken only if all

the following conditions are fulfilled:

1. The conflicting interest is fully disclosed.
2. The person with the conflict of interest is excluded from the discussion and approval of such a transaction.
3. A competitive bid or comparable valuation exists to maintain transparency; and
4. The Board or its duly constituted committee has determined that the transaction is in the best interest of the organization.

Gifts, Entertainment and Bribery

- a) Consistent with maintaining a high degree of professional integrity and objectivity in the performance of their duties and responsibilities, directors and employees should not give or accept gifts, entertainment, or any other personal benefit or privilege that could in any way influence, or appear to influence, their business dealings/ decisions or tarnish the corporate image of the Organization, from vendors, suppliers, contractors, beneficiaries, joint venture partners, Government Officials and their agents. However, this does not preclude giving or receiving gifts or entertainment that entail exchange of customary reciprocal courtesies and similar customary and reasonable expenditure to promote general business goodwill, if this does not, and does not appear to, influence decisions or business dealings of the organization.
- b) It is unacceptable to directly or indirectly offer, pay, solicit, or accept bribes, commissions, kickbacks, favors, promises, guarantees or assurances in any form. Any attempted transaction of this nature should be immediately reported to the MDF's management.