



Dr. Qaisar Ali Associates

(SMC-Private) Limited

Structural Design Specialists

CONSULT/1665

Code of Conduct





Introduction

At Dr. Qaisar Ali Associates, our reputation is our most valuable asset. It is built upon a foundation of trust, ethics, and professional integrity. This Code of Conduct outlines the fundamental principles and expectations for all employees, officers, and directors regarding key areas of ethical business practice. This includes our unwavering commitment to a workplace free from harassment, sexual exploitation, and abuse. Our commitment to lawful and ethical conduct is non-negotiable and is integral to our long-term success and sustainability.

1. Gifts and Hospitality

We recognize that the exchange of modest gifts and hospitality can be a legitimate part of building business relationships. However, such exchanges must never be allowed to create or appear to create a sense of obligation or influence.

Our principles:

-  Purpose: Any gift or hospitality offered or received must be directly related to a legitimate business purpose and must not be offered or accepted to secure an improper advantage.
-  Modesty and Reasonableness: The value and frequency of gifts or hospitality must be modest, reasonable, and proportionate. Extravagant, excessive, or cash gifts are strictly prohibited.
-  Transparency: All gifts and hospitality offered or received above a de minimis value (as defined in internal policies) must be recorded in the company's Gifts & Hospitality Register.
-  No Obligation: The offer or acceptance of a gift must not create any sense of obligation for either party.

Address:

Islamabad Office: Office No. 205, Hussain Complex (Building 74), Civic Center, Bahria Phase IV, Islamabad.





UAE Office: IFZA Business Park, DDP, PO Box 342001, Dubai, UAE

Pesh Office: Apartment # 08, Fourth Floor, Shinwari Plaza, Nasirbagh Road, Peshawar

2. Conflict of Interest

A conflict of interest arises when an individual's personal interests, relationships, or financial activities interfere, or appear to interfere, with their ability to act in the best interests of Dr. Qaisar Ali Associates.



Our principles:

-  **Duty to Disclose:** Employees must avoid situations that could lead to a real or perceived conflict of interest. Any potential or actual conflict must be disclosed immediately to a line manager or via the confidential reporting channel.
-  **Primary Loyalty:** Our primary loyalty is to Dr. Qaisar Ali Associates. Personal interests, investments, or external relationships must not influence business decisions.
-  **Examples of Conflicts:** Conflicts can include, but are not limited to:
 - Having a significant financial interest in a supplier, client, or competitor.
 - Employing or engaging a close relative in a business relationship with the company.
 - Using company property, information, or time for personal gain.
-  **Objective Oversight:** Decisions on perceived conflicts will be reviewed objectively by management to safeguard the interests of the company and the employee.

3. Anti-Corruption and Bribery

Dr. Qaisar Ali Associates has a zero-tolerance policy towards all forms of corruption, bribery, and kickbacks. We are committed to conducting our business fairly, honestly, and in full compliance with all applicable anti-corruption laws, including the UK Bribery Act and the US Foreign Corrupt Practices Act.

Our principles:

-  **No Bribery:** We strictly prohibit offering, giving, soliciting, or accepting any form of bribe, kickback, or other undue advantage to or from any person, whether in the public or private sector.
-  **Third-Party Due Diligence:** We apply the same high standards to our agents, consultants, suppliers, and joint venture partners. Appropriate due diligence is




Address:

Islamabad Office: Office No. 205, Hussain Complex (Building 74), Civic Center, Bahria Phase IV, Islamabad.

UAE Office: IFZA Business Park, DDP, PO Box 342001, Dubai, UAE

Pesh Office: Apartment # 08, Fourth Floor, Shinwari Plaza, Nasirbagh Road, Peshawar



conducted on third parties, and contracts with them will include anti-corruption clauses.

-  **Facilitation Payments:** Facilitation payments (small, unofficial payments to secure or expedite a routine government action) are prohibited.
-  **Political and Charitable Contributions:** Political contributions from company funds are not permitted without prior written approval from the company's CEO. Charitable contributions must not be used as a conduit for bribery and must be transparent and for legitimate purposes.
-  **Accurate Records:** We maintain accurate and transparent financial records. All business transactions must be properly recorded and must not conceal the true nature of the payment.

4. Prohibition of Harassment, Sexual Exploitation, and Abuse

Dr. Qaisar Ali Associates maintains a zero-tolerance policy towards all forms of harassment, bullying, sexual exploitation, and abuse. Everyone in our workplace, including employees, clients, and partners, has the right to be treated with dignity and respect. This policy applies to conduct at the workplace, during work-related activities, and in other contexts where the conduct may have a negative impact on the work environment.

Our principles:

-  **Definition:** Harassment is any unwelcome conduct, verbal, physical, or visual, that creates an intimidating, hostile, or offensive work environment. Sexual Harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. Sexual Exploitation and Abuse is any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including profiting monetarily, socially, or politically from the sexual exploitation of another.
-  **Unacceptable Behavior:** Prohibited behavior includes, but is not limited to:
 - Unwelcome sexual advances or propositions.
 - Sexually suggestive comments, jokes, or gestures.
 - Displaying or distributing sexually explicit or offensive material.


Address:

Islamabad Office: Office No. 205, Hussain Complex (Building 74), Civic Center, Bahria Phase IV, Islamabad.

UAE Office: IFZA Business Park, DDP, PO Box 342001, Dubai, UAE

Pesh Office: Apartment # 08, Fourth Floor, Shinwari Plaza, Nasirbagh Road, Peshawar

- Unwanted physical contact, including assault.
- Using a position of authority to coerce or intimidate others into sexual activity.
- Retaliation against anyone who reports or participates in an investigation of a complaint.





 **Duty to Report:** All employees are obligated to report any observed or experienced behavior that may violate this policy. Reports can be made without fear of retaliation.

5. Reporting and Compliance

Adherence to this Code is a condition of employment. All employees are responsible for reading, understanding, and complying with this Code. We provide regular training on these principles.

Employees are required to report any suspected or actual violations of this Code through our confidential and anonymous reporting channel, without fear of retaliation. All reports will be investigated promptly and thoroughly.

Mechanisms for Reporting, Investigation, and Addressing Harassment:

-  **Multiple Reporting Channels:** Employees can report concerns confidentially to their line manager, HR, any member of the Leadership Team.
-  **Impartial Investigation:** All reports will be taken seriously and investigated promptly, fairly, and impartially by trained individuals. The investigation process will protect the privacy of all parties involved to the greatest extent possible.
-  **Appropriate Action:** Where violations are found, the company will take appropriate disciplinary action, up to and including immediate termination of employment. We will also support affected individuals with appropriate resources and accommodations.
-  **Non-Retaliation:** Retaliation against any individual who, in good faith, reports a concern or participates in an investigation is strictly prohibited and will itself be subject to disciplinary action.

By upholding this Code of Conduct, we not only protect our company but also reinforce our commitment to being a responsible and trusted partner, building a sustainable future on a foundation of integrity.

Address:

Islamabad Office: Office No. 205, Hussain Complex (Building 74), Civic Center, Bahria Phase IV, Islamabad.

UAE Office: IFZA Business Park, DDP, PO Box 342001, Dubai, UAE

Pesh Office: Apartment # 08, Fourth Floor, Shinwari Plaza, Nasirbagh Road, Peshawar