

# Sindh Enterprise Development Fund

(A Company incorporated under section 42 of the Companies Ordinance, 1984)

## Code of Conduct

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## Application

This Code applies to employees of Sindh Enterprise Development Fund (SEDF).

SEDF is a Public Sector Company as defined in section 2(g) of Public Sector Companies (Corporate Governance) Rules, 2013 as notified by the Securities and Exchange Commission of Pakistan vide S.R.O. 283 (I) /2012 dated 22<sup>nd</sup> March, 2012. On 11<sup>th</sup> day of January, 2011, SEDF registered as a Company limited by Guarantee under section 42 (read with section 17) of the Companies Ordinance, 1984.

For the purposes of this document only, employees (other than judicial officials), includes:

- All employees of Sindh Enterprise Development Fund including permanent, temporary, fulltime, part-time or casual, and
- any volunteer, student, contractor, consultant or anyone who works in any other capacity for Sindh Enterprise Development Fund.

The Code applies at all times when employees' are performing official duties including when they are appearing in statutory capacities at conferences, training events, on business trips and attending work- related social events.

\* The Public Sector Companies (CG) Rules, 2013 applies to Public Sector Companies, including Companies incorporated under section 42 of the Companies Ordinance, 1984.

## How this Code works

The Code contains the ethics principles and their associated set of values as prescribed by the applicable laws, financial and corporate frameworks and best business practices. It also contains standards of conduct for each ethics principle. The ethics principles are:

- ✓ ***Integrity and impartiality***
- ✓ ***Promoting the public good***
- ✓ ***Commitment of compliance with Government regulation***
- ✓ ***Accountability and transparency***

These are the fundamental principles of ethical behavior, essential to robust public sector integrity and accountability and which Public Sector Companies must promote in their internal and external relationships.

Each principle is strengthened by the set of values describing the behavior that will demonstrate that principle. The principles and associated values are equally important.

The standards of conduct, contained in the Code under each set of principles and values, help us as individuals to understand how we put these principles and values into practice. The standards are not intended to cover every possible scenario, therefore by adhering to this Code, we are committed to upholding the intention and spirit of defined principles and values.

Chief Executive can supplement/ replace this Code or any of its provisions as per the implied best business practices and to comply with Public Sector Companies (Corporate Governance) Rules, 2013. Any amended Standard of Practice will apply to SEDF employees in the same way as this Code.

As well as upholding the principles, values and complying with standards of conduct set out in this Code, SEDF employees' will also comply with all relevant legislation, awards, certified agreements, subsidiary agreements, directives, government policies and other applicable standards. We will also adhere to the policies, organizational values and organizational documents of SEDF.

## Using this Code

The Code describes how we will conduct ourselves in delivering services to the agri-business community of Sindh in general and contributes towards overall development of Pakistan's agri-economy.

An ethical culture in Public Sector Companies starts with Chief Executive Officers and is demonstrated through our senior management and inspires all employees. This Corporate ethical behavior of senior executives trickles down from top to bottom.

### All employees

We take personal responsibility to uphold this Code and demonstrate the principles and values established for the Public Sector Companies to perform our duties.

**Punctuality:** All the employees are required to be regular and punctual at work every day. Staff members attending office after 09:30 am will be marked as "Late" and half day will be counted on attendance sheet. Three (3) half days within one month shall be equal to one leave. It is especially important for the senior officers to encourage compliance with the prescribed rules by setting personal example. The management aspires to project an image of corporate excellence and professionalism with integrity.

**Dress Code:** Therefore, all the staff members must uphold this image in their attire and dress. Any violation in this regard may result in disciplinary action. Prescribed dress code for all male employees shall be suit / pant-shirt, however, on Fridays, they may wear smart casual or National dress. Every staff member shall uphold official dress code as required by section 3.3 of the Human Resource (HR) Manual. Any kind of clothing with conspicuous advertising of other corporate logos is unacceptable. Employees should select glasses which are not mirrored, to maintain eye contact. The employees are required to take proper care of personal hygiene and appearances in compliance with their job descriptions.

**Office Decorum:** All the employees shall maintain utmost decorum, courtesy and exemplary manners when interacting with clients, government officials, senior officials, or with each other. Any violations in this regard may be treated as misconduct resulting in disciplinary action. To maintain office decorum, employees shall always ensure to speak in such low volume and pitch that the colleagues sitting at the adjoining desks should not be disturbed. Intercom facility should be used instead of talking to colleagues or departmental staff across the desks. Employees shall serve the Company and devote whole time during office hours and discharge their duties honestly and faithfully and use their utmost endeavors to promote the interest of the Company with integrity. If an employee suspects a customer or any other employee of the Company, violating any law or regulation, he/ she should report the matter immediately to the Chief Internal Auditor.

This Code recognizes that we can all demonstrate ethical leadership in how we perform our role, and is a statement of our commitment towards the delivery of quality professional services.

## Chief Executive and Senior Executive Officers

As Chief Executive Officer (CEO) and Senior Executive Officers (SEOs) have a responsibility to visibly demonstrate and uphold the principles and values of the *Corporate Governance Rules for Public Sector Companies*. CEO and SEOs' roles are to promote an organizational culture that values high ethical standards and behavior.

**Confidentiality:** All employees including CEO, are required to maintain strict secrecy regarding the Company's affairs and shall not disclose (except so far as is necessary and appropriate in the normal course of employment) to any person, any information as to the practice, dealing or affairs of the Company or any of their customers, which may come to their knowledge by reason of their employment. All employees will have to sign the 'Declaration of Secrecy' (as per Annexure-II of HR manual) at the time of joining the Company. All employees are required to maintain strict secrecy regarding the Company's affairs and shall not disclose (except so far as is necessary and appropriate in the normal course of employment) to any person, any information as to the practice, dealing or affairs of the Company or any of their customers, which may come to their knowledge by reason of their employment.

CEO and SEOs' openly demonstrate their conscious commitment to ethics by communicating the importance of ethical decision-making at workplace, and promoting ethical behavior in day-to-day actions. Chief Executive and SEOs' will also ensure that employees' will have access to training in the operation of this Code and in ethical decision-making more broadly, making the Code meaningful for all employees.

## Managers and supervisors

Managerial behavior sets the tone for the conduct of all employees. Managers and supervisors have a responsibility to model and promote this Code. Managers have the ability to influence others by fostering an ethical environment and demonstrate this awareness in performing their duties and in making decisions.

Managers ensure public service employees understand the Code, and any other relevant legislation, delegations, policies or other information required to satisfactorily perform their duties in the manner required by this Code. Managers also ensure that appropriate development and training is provided to allow employees' to perform their duties effectively.

## Upholding this Code

As part of demonstrating our commitment to uphold this Code, we need to identify and report conduct that is not consistent with this Code. Managers have a responsibility to make fair, transparent and consistent decisions regarding any allegations of behavior that does not uphold this Code. We will support employees who report genuine concerns of wrongdoing and manage any reports of suspected wrongdoing in a fair, transparent and consistent manner.

# Principle and values

## *Integrity and impartiality*

In recognition that public office involves a public trust, Public Sector Companies and public officials seek to promote public confidence in the integrity of the public sector and –

- a. are committed to the highest ethical standards;
- b. accept and value their duty to provide advice which is objective, independent and impartial;
- c. show respect towards all persons, including employees, clients and the general public;
- d. acknowledge the primacy of the public interest and undertake that any conflict of interest issue will be resolved or appropriately managed in favor of the public interest; and committed to honest, fair and respectful engagement with the community.

## Standards of conduct

### 1.1 Commit to the highest ethical standards

As Public Sector employees we are required to ensure that our conduct meets the highest ethical standards when we are fulfilling our responsibilities.

We will:

- a. ensure any advice that we provide is objective, independent and impartial
- b. ensure our decision making is ethical
- c. engage with the community in a manner that is consultative, respectful and fair, and
- d. meet obligations to report suspected wrongdoing, including conduct inconsistent with this Code.

### 1.2 Manage conflicts of interest

A conflict of interest involves a conflict between our duty, as Public Sector employees, to serve the public interest and our personal interests. The conflict may arise from a range of factors including our personal relationships, our employment outside the Public Sector, our membership of special interest groups, or our ownership of shares, companies, or property.

As Public Sector employees we may also experience conflicts of interest between our public service ethics and our professional codes of ethics, or with our personal beliefs or opinions. Having a conflict of interest is not unusual and it is not wrongdoing in itself. However failing to disclose and manage the conflict appropriately is likely to be wrongdoing. As Public Sector

employees we are committed to demonstrating our impartiality and integrity in fulfilling our responsibilities and as such we will:

- a. always disclose a personal interest that could, now or in the future, be seen as influencing the performance of our duties. This will be done in accordance with SEDF's policies and procedures
- b. actively participate with SEDF policy makers in developing and implementing resolution strategies for any conflict of interest, and
- c. ensure that any conflict of interest is resolved in the public interest.

### 1.3 Contribute to public discussion in an appropriate manner

Commenting on government policy is a matter for Ministers, not employees. Unless prior authorization has been given, we will not comment to the media on government policy.

Where providing factual information to the public on government policy is a part of our official duties and responsibilities, we will ensure that information is appropriately authorized, and that we properly represent government policy and administration in its intended manner and spirit.

Like any other citizen, we have the right to contribute to public discussions on community and social issues in our private capacity.

In doing so, we will:

- a. take reasonable steps to ensure that any comment we make will be understood as representing our personal views, not those of government
- b. maintain the confidentiality of information we have access to due to our roles, that is not publicly available, and
- c. be aware that personal comments about a public issue may compromise our capacity to perform the duties of our role in an independent, unbiased manner.

### 1.4 Manage participation in external organizations

Our work as a Public Sector employee does not remove our right to be active privately in a political party, professional organization or trade union.

As a member of a political party, however, we are aware that participating in activities in the public arena, where we may be identified as a Public Sector employee, can give rise to a perception of conflict of interest (see section 1.2). Where this situation arises, we will declare and manage our activities in accordance with our SEDF's policies.

If we are elected as workplace representatives or officials of a trade union or professional association, we are not required to seek permission from our workplace before speaking publicly in that capacity, and we will make it clear that our comments are made only on behalf of that organization. In all instances, we will comply with the appropriate laws of privacy, confidentiality and information management.

## 1.5 Demonstrate a high standard of workplace behavior and personal conduct

We have a responsibility to always conduct and present ourselves in a professional manner, and demonstrate respect for all persons, whether fellow employees, clients or members of the public.

We will:

- a. treat co-workers, clients and members of the public with courtesy and respect, be appropriate in our relationships with them, and recognize that others have the right to hold views which may differ from our own
- b. ensure our conduct reflects our commitment to a workplace that is inclusive and free from harassment
- c. ensure our fitness for duty, and the safety, health and welfare of ourselves and others in the workplace, whether co-workers or clients
- d. ensure our private conduct maintains the integrity of the Public Sector and our ability to perform our duties, and
- e. comply with legislative and/or policy obligations to report employee criminal charges and convictions.

## Principle and values

### *Promoting the public good*

In recognition that the public sector is the mechanism through which the elected representatives deliver programs and services for the benefit of the people. Public Sector Companies and public service employees/ officials -

- a. accept and value their duty to be responsive to both the requirements of government and to the public interest;
- b. accept and value their duty to engage the community in developing and effecting official public sector priorities, policies and decisions;
- c. accept and value their duty to manage public resources effectively, efficiently and economically;
- d. value and seek to achieve excellence in service delivery; and
- e. value and seek to achieve enhanced integration of services to better service clients.

## Standards of conduct

### 2.1 Commit to excellence in service delivery

Public Sector Companies are entrusted with public funds to develop and deliver services to the community on behalf of government.

We have a responsibility to:

- a. deliver services fairly, courteously, effectively, and ensure we use resources efficiently and economically
- b. assist all members of the community, particularly people with disabilities, those who speak languages other than Urdu/ English, and those who may find it difficult to access government services, and
- c. treat complaints from clients and the community seriously and respond to constructive feedback as an opportunity for improvement.

### 2.2 Ensure appropriate community engagement

Community participation is crucial to the development of quality government planning and decision-making processes. We have a responsibility, where appropriate and in accordance with our official duties, to:

- a. listen and respond to issues and concerns raised by individual farmers/ cultivators, processing plant owners, associated body of such agriculturists
- b. consult with the public/ growers to assist in the development of public policy regarding agri projects in Sindh province, and
- c. assist in raising community awareness about issues of agri fraternity.

## 2.3 Work as an integrated service

In order to deliver excellence in customer service, we will work together to address complex issues and provide integrated services specifically for the agri community of Sindh and to develop overall agri economy of Pakistan.

We have a responsibility, where appropriate and in accordance with our official duties, to:

- a. share information across rural areas of Sindh, to enhance the seamless delivery of services and provide technical and financial assistance within the parameters of our mandate
- b. utilize/ share in-house resources to generate economies and efficiencies
- c. collectively plan and deliver related programs and services with other agricultural development institutes/ labs/ organizations/ entities, and
- d. work cohesively at the local, regional, state and national levels to provide integrated services.

## Principle and values

### *Commitment of compliance with Government regulation*

In recognition that the public sector has a duty to uphold the system of government and the laws of the State and local government, Public Sector Companies and public service employees/ officials -

- a. accept and value their duty to uphold the system of government and the laws of the State and local government;
- b. are committed to effecting official public sector priorities, policies and decisions professionally and impartially; and
- c. accept and value their duty to operate within the framework of the Finance Department and to serve the community.

This does not limit the responsibility of a Public Sector Company or public sector official to act independently of government if the independence of the Company and of the official is required by legislation or government policy, or is a customary feature of the work of the Company or employee/ official.

## Standards of conduct

### 3.1 Commit to our roles in public service

Our role is to undertake our duties, and to give effect to the policies given by the Finance Department regardless of political complexion of the elected Government.

We will:

- a. accept that the elected government has the right to determine policy and priorities
- b. be responsive to the government of the day and implement decisions and policies professionally and impartially
- c. comply with the laws of the land
- d. comply with (as far as possible) certified agreements, subsidiary agreements, directives, whole-of-government policies and other international standards given that they are not in conflict with laws of the land, and
- e. adhere to the policies, organizational values and organizational documents of Finance Department.

## 3.2 Maintain appropriate relationships with Ministerial staff

Ministerial advisors and the public service share a common commitment to serving the government of the day. Central to good government, and the ability to carry out the designated role of the public service, are positive and productive interactions between the administrative and political arms of the government. In providing advice to Ministry, we will ensure our interactions are positive and productive when engaging with ministerial staff.

Ministerial staff is not empowered to direct public service employees in their own right. If this occurs, we will bring this to the attention of our SEDF's senior management/ CEO.

## Principle and values

### *Accountability and transparency*

In recognition that public trust in public office requires high standards of public administration, Public Sector Companies and public service employees/ officials –

- a. are committed to exercising proper diligence, care and attention;
- b. are committed to using public resources in an effective and accountable way;
- c. are committed to managing information as openly as practicable within the legal framework;
- d. value and seek to achieve high standards of public administration; and
- e. value and seek to operate within a framework of mutual obligation and shared responsibility between Public Sector Companies and public services employees/ officials.

### Standards of conduct

#### 4.1 Ensure diligence in public administration

We have an obligation to seek to achieve high standards of public administration and perform our duties to the best of our abilities.

We will:

- a. apply due care in our work, and provide accurate and impartial advice to all clients whether members of the public, public service agencies, or any level of government
- b. treat all people equitably and consistently, and demonstrate the principles of procedural fairness and natural justice when making decisions
- c. exercise our lawful powers and authority with care and for the purpose for which these were granted, and
- d. comply with all reasonable and lawful instructions, whether or not we personally agree with a given policy direction.

#### 4.2 Ensure transparency in our business dealings

In order to ensure all government dealings with private sector are conducted with the highest level of integrity, we will ensure transparency and will not accept gifts, benefits or hospitality beyond SEDF policies.

### 4.3 Ensure appropriate use of official resources, public property and facilities

We are accountable for all resources that we use in the course of our duties.

We will:

- a. be economical, and avoid waste and extravagance in the use of public resources for proper purposes
- b. use any public resource in accordance with official policies
- c. purchase, manage and care for public resources in accordance with official policies, and
- d. responsibly utilize human assets such as corporate knowledge and intellectual property, as public resources.

### 4.4 Ensure appropriate use and disclosure of official information

The public has a right to know the information that is created and used by the government on their behalf. This right is balanced by necessary protections for certain information, including personal information.

Information privacy legislation protects against the misuse of personal information and we have an obligation to ensure the lawful collection and handling of personal information.

In addition,

we will:

- a. treat official information with care and use it only for the purpose for which it was collected or authorized
- b. store official information securely, and limit access to those persons requiring it for legitimate purposes, and
- c. not use confidential or privileged information to further personal interests.

We will continue to respect the confidentiality of official information when we leave public service employment.

## For more information

Kindly read this code in conjunction with the Human Resource Manual and the ‘Statement of Ethics and Business Practices’. If, you need assistance about how this Code relates to you, please contact Compliance Department, SEDF. For further advice about the operation of this Code, you may wish to contact the Head of Department, Human Resource and Administration Department.

Copies of this Code of Conduct for the Sindh Enterprise Development Fund, plus additional supporting information can be accessed at ‘[www.sedf.gos.pk](http://www.sedf.gos.pk)’.