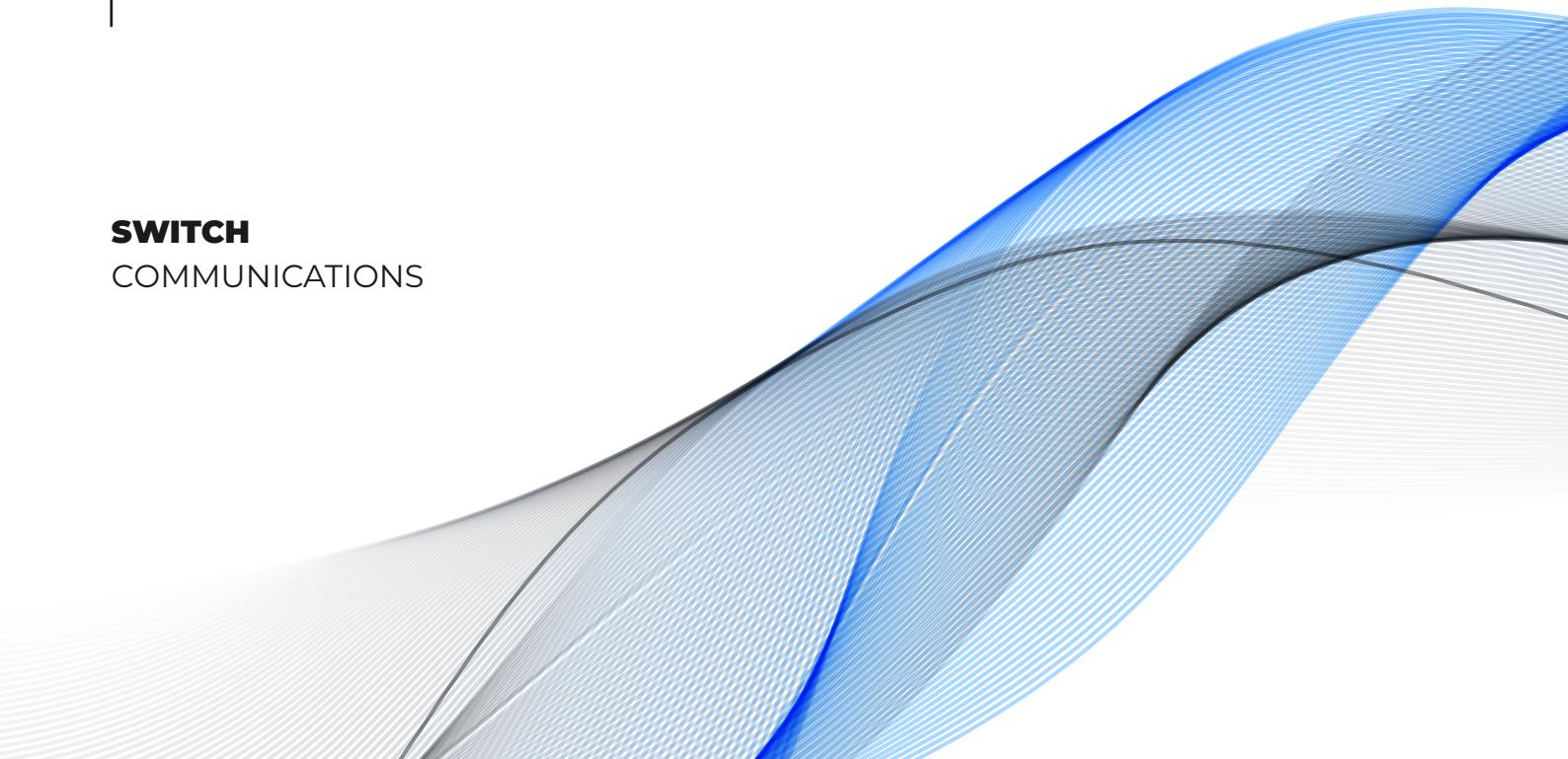




CODE OF CONDUCT

Our Roadmap for Ethical Excellence

SWITCH
COMMUNICATIONS



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Introduction

The Code of Conduct serves as a central document articulating the principles, values, and conduct standards expected from everyone at Switch, encapsulating our devotion to integrity, ethics, and responsibility across all facets of our operations.

This Code is owned and approved by our Chief Executive Officer with delegated authority to People & Culture Team to interpret and enforce the Code.

The primary aim of the Code of Conduct is to:

- Provide clear directives for ethical decision-making and behavior.
- Establish a framework for nurturing a positive and respectful workplace environment.
- Safeguard the reputation and integrity of the organization.

In essence, the Code of Conduct transcends being a mere set of regulations; it also embodies our collective commitment to upholding the Values of Switch, shaping our organizational ethos, directing our actions, and reaffirming our unwavering dedication to excellence and ethical behavior.

Message from the CEO

Switchers, I am pleased to present our Code of Conduct, the cornerstone of our commitment to integrity and ethical conduct.

Since our inception in 2011, we have been at the forefront of Digital & Conventional Value-Added Services (VAS) in Pakistan. Coupled with our people centric approach and ambitious goals, our ethical standards have formed the basis of our mission to revolutionize the digital ecosystem of Pakistan. For our long-term success, it is essential we conduct ourselves in a transparent and responsible way gaining the trust of partners, stakeholders and customers.

This document will stand as our beacon, guiding us towards ethical excellence. Please review this document thoroughly and remember to consult it whenever in doubt.



**Khizer
Alam Khan**



Our Code

Anti-corruption & Bribery

In line with our steadfast dedication to ethical conduct, our organization unequivocally condemns all forms of corruption and bribery by enforcing a zero-tolerance policy in this regard. We reject any actions that compromise our values, diminish our reputation, or erode the trust bestowed upon us by our stakeholders. It is incumbent upon every member of our team to abstain from engaging in bribery (including but not limited to expensive gifts), kickbacks, or any other unethical practices. We are committed to conducting our business affairs with transparency, fairness, and accountability at all times.

Any suspicions or instances of corruption or bribery must be reported promptly to People & Culture Team, Concerned Manager or the Executive Leadership Team and strict disciplinary measures will be enforced against those found in breach of this policy.

Conflicts of Interest

In adherence with our commitment to transparency and ethical conduct, we vigilantly address and mitigate conflicts of interest. We recognize that situations may arise where personal interests conflict with the interests of the company, its clients, or other stakeholders.

Employees are obligated to identify and disclose any such conflicts promptly. This includes, but is not limited to, financial interests, relationships with suppliers or competitors, and outside employment. External employment (part-time or full-time) is not allowed unless approved by the organization. But employment with competitors (part-time or consultancy) is strictly prohibited.

By proactively disclosing conflicts of interest, we uphold the integrity of our decision-making processes and maintain the trust of our stakeholders. Failure to disclose conflicts of interest will result in disciplinary action.

Diversity, Equity & Inclusion

At Switch Communications, we embrace diversity, equity, and inclusion as essential pillars of our organizational culture. We recognize that diverse perspectives, experiences, and backgrounds are inherent in driving innovation, creativity, and growth. Upholding justice through equity and diversity is not just a commitment but a fundamental principle that guides our actions and decisions,

ensuring fairness and opportunity for all in terms of employment and business.

We are committed to fostering an inclusive environment where all employees feel welcomed, respected, and empowered to contribute their unique talents and perspectives. We aim at having no direct or indirect negative discrimination based on race, color, gender, sexual orientation, age, disability, language, religion, employee representation, political or other opinions, national or social origin, property, birth or other status. Lastly, our key focus is on building a tolerant workplace with special focus on religion i.e. putting aside our biases of sects and other diverging religious opinions.

By celebrating diversity and promoting inclusion, we not only enrich our workplace but also strengthen our ability to serve our diverse customer base and communities. At Switch Communications, diversity is not just a goal; but an essential part of the fabric that holds the organization together.

Work Environment and Harassment

Our working environment standards are extended to every member of our diverse community and exemplified by all leaders and employees.

We have a zero-tolerance policy for degrading treatments towards any employee, such as mental or sexual harassment or discriminatory gestures, language or physical contact that is sexual, coercive, threatening, abusive or exploitative. We strongly believe that every employee deserves to feel safe and valued, provided with an environment that empowers them to thrive and succeed.

Data Privacy & Protection

Switch Communications upholds strict protocols for data privacy, protection, and prevention of data leakages. We ensure that all data i.e. including but not limited to revenue details, software codes, business plans/strategies; whether pertaining to employees, clients, or the organization itself, is shared externally and handled with the utmost confidentiality and integrity. Moreover, misuse of subscriber data including but not limited to personal details, location details etc. is strictly prohibited.

Our employees are trained and continuously educated on the importance of data security measures, including encryption, access controls, and secure storage practices. Any incidents of data breaches or potential leakages are promptly reported and addressed, with thorough investigations conducted to identify root causes and implement corrective actions. Lastly, we expect our employees to act in the best interest of the organization, and exhibit professional demeanor while representing the company. Similarly, in personal capacity we expect employees to be the best brand ambassadors possible, be it on social media or otherwise.

By prioritizing data privacy and protection, we maintain the trust and confidence of our stakeholders while complying with relevant laws and regulations governing data security.

Reporting

At Switch Communications, we take pride in our open-door policy exhibiting our commitment to promote open communication. Similarly, we encourage all employees to feel empowered to voice ethical concerns and report any potential breaches or deviations from policy, without hesitation. All such actions, in good faith, are encouraged because we strongly believe that staying quite in such situations is a form of subtle support.

To report any breach of the Code of Conduct, employees can confidentially reach out to the People & Culture Team through official communication or in person, ensuring their concerns are addressed promptly and sensitively.

Additionally, significant breaches can be escalated to the Executive Leadership Team for thorough investigation and appropriate action, reinforcing our commitment to upholding ethical standards and maintaining a positive workplace environment.

Agreement

I being an employee of the Switch Communication (Private) Limited (the "Company") sign this agreement with the Company to recognize the importance of safeguarding data privacy, maintaining the integrity of sensitive information of the Company and complying with the Company's Code of Conduct. I shall play a crucial role in upholding these principles and ensuring that the Company's data protection measures remain robust while positively contributing the Company's culture and work environment.

I acknowledge and agree to adhere to the following commitments:

1. Compliance with Data Privacy Policies:

- 1.1 I agree to familiarize myself and comply with all data privacy policies, procedures, and guidelines implemented by the Company. This includes but is not limited to:
 - a. Handling personal and sensitive information with utmost care and confidentiality;
 - b. Following secure data storage and transmission protocols; and
 - c. Abiding by legal regulations such as GDPR, CCPA, etc., relevant to the Company's operations.

2. Prevention of Data Breaches:

2.1 I understand the potential ramifications of data breaches and commit to taking necessary precautions to prevent such incidents. This entails:

- a. Using Company-provided secure devices and networks for work-related activities;
- b. Being vigilant against phishing attempts, malware, and other cybersecurity threats; and
- c. Reporting any suspicious activities or security vulnerabilities promptly to the appropriate authorities within the Company.

3. Non-Involvement in Unauthorized Data Access:

3.1 I affirm that I will not engage in any unauthorized access, misuse, or sharing of confidential or proprietary information belonging to the Company or its clients/partners. This includes:

- a. Respecting access controls and permissions assigned to me within the Company's systems; and
- b. Refraining from disclosing sensitive information to unauthorized individuals or third parties without proper authorization from the Company in writing.

4. Compliance with Code of Conduct:

4.1 I agree to comply with the Company's Code of Conduct and commit to upholding our shared values. This includes:

- a. Contributing to a workplace culture of where every individual feels valued, respected and heard.
- b. Promote an environment where honesty, fairness and self-accountability prevail.
- c. Ensuring my interactions within the workplace and externally while representing the Company are aligned and in the best interest of Switch Communications.



THANK YOU!