

# IPT POWERTECH GROUP



<b>Code of Conduct</b>	<b>Version N0: 1</b>
<b>Department: Human Resources</b>	<b>Code : HRAM_P&amp;P_OD_CoD</b>
	<b>Issue Date: 09/01/2018</b>

## CODE OF CONDUCT

### Introduction

It is IPT POWERTECH GROUP's policy to conduct business ethically and in compliance with all laws and regulations applicable to our business.

The objective of Code of Conduct is to create a safe equal and transparent work environment. The policy aims at creating a complete corporate environment which would be growth oriented and performance encouraging.

It is just as essential that employees act in a professional manner by being honest and truthful, and extend the highest courtesy to co-workers, visitors, customers, vendors and clients.

Employees who are aware of, or suspect a violation of applicable laws, rules or regulations at IPT POWERTECH GROUP, shall immediately report to either:

The immediate Supervisor

Their Concerned Department Manager, and

The Human Resources Manager

Employees reporting any suspected violation will not be subject to retaliation and the reports submitted shall be classed as confidential. Violation of the Code of Conduct policy may result in disciplinary action up to and including immediate termination.

IPT POWERTECH GROUP's Top Management shall determine, or designate, appropriate persons to determine suitable action in respect of violations of the Code of Conduct.

### **1 – Conflict of Interest**

All employees working for, or on behalf of IPT POWERTECH GROUP, are required to adhere to the following rules:

Employees must be free from conflict of interest, or the potential for conflict of interest, that could influence their judgment objectivity or loyalty to the Group.

Employees may have ownership, or partial ownership, of a legitimate financial investment or operations outside their jobs at IPT POWERTECH GROUP, but any potential conflict of interest raised by those financial investments must be immediately disclosed to IPT POWERTECH GROUP's Top Management.

Employees shall not hire/or supervise family members or closely related persons employed by IPT POWERTECH GROUP.

Employees shall not accept gifts or benefits that do not meet IPT POWERTECH GROUP's rules regarding Gratuities as defined in the Gratuities section of this handbook.

Employees shall not be in a financial relationship or have a direct or indirect financial interest in an IPT POWERTECH GROUP's supplier or customer.

Employees shall not invest in an outside opportunity in which IPT POWERTECH GROUP has an interest in, except for having an insignificant stock interest in publicly held companies.

Employees shall not take part in any decision of IPT POWERTECH GROUP involving a company that employs a family member or closely related persons.

Employees shall not have a second job where the second employer is a direct or indirect competitor, distributor, supplier or customer of IPT POWERTECH GROUP.

Employees shall not have a second job or consulting relationship that affects their ability to perform their assignments at IPT POWERTECH GROUP.

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Employees shall not use non-public Information of IPT POWERTECH GROUP for their personal gain or advantage, or for the gain or advantage of another, including the purchase or sale of securities in a business that IPT POWERTECH GROUP is interested in acquiring, selling or otherwise establishing or terminating business relations with.

Employees shall not Personally receive any amount of cash or gifts including discounts on merchandise, from any customer of or supplier of goods or services to IPT POWERTECH GROUP. This includes borrowing from third parties (other than banks) who have business relationships with the Company.

Other than those circumstances covered by the improper payment section of this Code, this conflict of interest policy does not prevent you from receiving or giving reasonable business-related entertainment (e.g. dining or attending sport or social events) that is conducted in the best interest of IPT POWERTECH GROUP and does not influence business related decisions to the detriment of the Group.

Employees are responsible for ensuring avoiding conflicts of interest. If an employee is unsure whether an action might create a conflict of interest, or if he/she is involved in a conflict of interest, he/she must discuss the situation with their manager to prevent a possible misunderstanding regarding your actions.

Employees shall request IPT POWERTECH GROUP’s Top Management approval prior to receiving any personal honoraria for services they performed that are closely related to work.

IPT POWERTECH GROUP encourages service with constructive and legitimate not-profit organizations. Participation in civil affairs is encouraged as part of our commitment to community involvement. There are cases, however, in which some organizations have business relationships with IPT POWERTECH GROUP; therefore, any handling of confidential information might result in a conflict of interest. An employee’s manager must be advised upon any potential conflict.

## 2- Improper Payments

In keeping with our high ethical standards, IPT POWERTECH GROUP will avoid problems associated with improper payments.

Therefore, employees must not give bribes, kickbacks or similar payments to any person or entity for the purpose of obtaining or retaining business for IPT POWERTECH GROUP or for any other reason relating to IPT POWERTECH GROUP’s business.

In addition, nothing should be given, or promised to be given, which could be construed as improperly influencing the decision of government or political employees, officers or candidates. This prohibition also prevents the use of intermediaries to give, or promise to give, anything to such people on behalf of IPT POWERTECH GROUP or its employees.

## 3- Fraud and accurate records

All IPT POWERTECH GROUP employees must be vigilant in identifying and reporting fraudulent activities or any suspicion that fraudulent activities exist.

Fraudulent activities are acts or omissions deliberately committed to gain personal advantage that cause loss or damage to IPT Powertech Group. They can include gaining advantage for others, not only for the person who carries out the fraud.

To maintain proper business practices and prevent fraudulent activities, IPT POWERTECH GROUP insists that precise and accurate company records and accounts are maintained. The information the company supplies to auditors, regulatory agencies or government bodies must be accurate, complete and not misleading. All IPT POWERTECH GROUP’s accounting records, and the reports produced from those records, must be kept and presented in accordance with all applicable laws and relevant accounting standards.

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Records of gifts and entertainment received or given must be maintained with any related expenses fully documented and business purpose clearly stated. No undisclosed or assets of IPT POWERTECH GROUP may be maintained or established for any purpose and no more than one set of books shall be maintained. No false or artificial entries should be made in any accounts.

Any payments to staff accounts or otherwise received from IPT POWERTECH GROUP without prior notification to staff should be reported immediately to the Human Resources Manager. Details of payment should be requested for. Failure to do so will be considered as an act of fraud and conspiracy against IPT POWERTECH GROUP.

## 4- Confidentiality

During the course of employment, employees may be disclosed with certain Technical and Business information of the Company as well as that of the Client. IPT POWERTECH GROUP places a high value on its confidential information. Confidential information means information not generally known to the public that is valuable and that, if disclosed inappropriately, could cause harm, damage, or other adverse consequences to our business.

This may include information about IPT POWERTECH GROUP, its employees, its customers, and other third parties with whom we deal.

Any disclosure of confidential business information will result to disciplinary action, up to and including termination of employment.

Employee will perform services for IPT POWERTECH GROUP which may require IPT POWERTECH GROUP to disclose confidential and proprietary information to Employee.

“Confidential Information” is any information of any kind, nature, or description concerning any matters affecting or relating to Employee's services for IPT POWERTECH GROUP, the business or operations of IPT POWERTECH GROUP, and/or the products, drawings, plans, processes, or other data of IPT POWERTECH GROUP. Accordingly, to protect the IPT POWERTECH GROUP “Confidential Information” that will be disclosed to Employee, the Employee agrees as follows:

Employee will hold the “Confidential Information” received from IPT POWERTECH GROUP in strict confidence and shall exercise a reasonable degree of care to prevent disclosure to others.

Employee will not disclose or divulge either directly or indirectly the “Confidential Information” to others unless first authorized to do so in writing by IPT POWERTECH GROUP.

Employee will not reproduce the “Confidential Information” nor use this information commercially or for any purpose other than the performance of his/her duties for IPT POWERTECH GROUP.

Employee will, upon the request or upon termination of his/her relationship with IPT POWERTECH GROUP, deliver to IPT POWERTECH GROUP any notes, documents, drawings, equipment, and materials received from IPT POWERTECH GROUP or originating from its activities for IPT POWERTECH GROUP.

IPT POWERTECH GROUP shall have the sole right to determine the treatment of any information that is part or project specific received from Employee, including the right to keep the same as a trade secret, to use and disclose the same without prior patent applications, to file copyright registrations in its own name or to follow any other procedure as IPT POWERTECH GROUP may deem appropriate.

IPT POWERTECH GROUP reserves the right to take disciplinary action, up to and including termination for violations of this Agreement.

Employee represents and warrants that it is not under any preexisting obligations inconsistent with the provisions of this Agreement.

## 5 – Brand Protection

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IPT POWERTECH GROUP considers the quality and protection of its brand to be of paramount importance and central to its success.

If employee is aware of any person or entity copying or exploiting any unique aspect of our brand you should immediately contact line manager.

## 6 – Appropriate Use of Corporate Resources

Employees are responsible and accountable for the safeguarding of all IPT POWERTECH GROUP assets, materials and intellectual property, within their sphere of influence or area of responsibility, regardless of perceived or actual monetary value.

IPT POWERTECH GROUP reserves the right to recover the cost of lost or damaged material that was under the custody of the Employee, or to penalize Employees in accordance with the Lebanese Labor Law.

The use of IPT POWERTECH GROUP tools, material or equipment is restricted to use for official purposes only.

## 7 – Conduct Towards Employees

### 1 – Health, Safety and Environment

IPT POWERTECH GROUP is firmly committed to ensuring the health, safety and welfare of its employees, and each employee plays a critical role in ensuring the quality and safety of the working conditions at the company.

Therefore, all employees are expected to adopt a proactive, co-operative attitude towards the health and safety of all IPT POWERTECH GROUP employees, customers and suppliers, and others working at or visiting IPT POWERTECH GROUP property.

Staff members have the obligation to escalate to the HSE Manager and or the HR Manager, any health safety and environmental concerns that are observed on any of IPT POWERTECH GROUP's business locations.

In order to maintain a safe environment in the company, any individual using the company car or his personal car is expected to take all the necessary steps to avoid endangering himself and others while operating company or company-sponsored vehicles during working hours. To ensure proper application of this procedure, employees authorized to operate the car are expected to:

Ensure that all the occupants, including himself/herself, wear seat belts when the vehicle is in operation

Ensure that the vehicle to which the employee is assigned is maintained in a safe driving condition

Avoid using cellular phones (unless they are equipped with hands-free operations), personal listening devices, and conducting any other activities which may impede the driver's ability to focus on safely operating the vehicle while it is in motion

Refrain from giving the car to someone who is unauthorized to use it under any circumstances

Refrain from driving the car while under the alcohol effect under any circumstances

### 2 – Discrimination:

IPT POWERTECH GROUP recognizes and encourages the uniqueness of individual contribution within its team.

In all aspects of employment, such as recruitment, compensation and benefits, training, promotion, transfer and termination, you are expected to treat individuals solely according to their abilities to meet job requirements without regard to factors such as race, religion, color, ethnic or national origin, age, disability, gender or marital status.

### **3 – Harassment:**

It is IPT POWERTECH GROUP's policy to maintain a workplace that is free from harassment. IPT POWERTECH GROUP is committed to having a working environment that is free of discrimination and harassment based on race, color, religion, age, sex, nationality, disability or any protected status. Offensive or harassing behavior will not be tolerated against Employees.

IPT POWERTECH GROUP Employees, customers, vendors and stakeholders shall comply with this policy. Department heads and supervisors shall be responsible and accountable for taking proper actions to end such behavior in their work environment.

IPT POWERTECH GROUP's employees will treat everyone fairly, have mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices.

Any employee who believes that he or she (or another employee) is the object of harassment or discrimination is strongly encouraged to follow the complaint procedure outlined below.

Any employee may initiate the complaint procedure, without fear of reprisal, by immediately reporting such complaints to the:

The employee's immediate supervisor.

The Director of Human Resources.

An officer of IPT POWERTECH GROUP, if the employee feels that he or she is unable to report a complaint to the Director of Human Resources.

Harassment may include but is not limited to:

Offensive physical actions, written or spoken, and graphic communication (e.g. obscene hand or finger gestures or sexually explicit drawings)

Any type of physical contact when the action is unwelcomed by the recipient.

IPT POWERTECH GROUP takes all complaints of harassment or discrimination seriously. All complaints will be investigated immediately by the Human Resources Department.

The Human Resources Department will review the case and will recommend a course of action in line with the disciplinary policy of IPT POWERTECH GROUP.

Any employee who believes that the actions or words of a supervisor or fellow employee or some other person(s) encountered in the workplace constitute unwelcome harassment has a responsibility to report such incident as soon as possible to the appropriate supervisor, manager or Human Resources Director.

All complaints will remain confidential. Complaints made in good faith will in no way be.

### **4 – Political and Religious Contact and Contributions**

IPT POWERTECH GROUP in no way wishes to influence people in their personal beliefs. Accordingly, employees may not engage in political or religious activities in the workplace and may not provide IPT POWERTECH GROUP funds or resources to support any political or religious organization or political candidate.

In particular, IPT POWERTECH GROUP disassociates itself from any political or religious activity, which incites extremism or challenges our commitment to cultural diversity and equal opportunity.

### **8 – Community Relations**

IPT POWERTECH GROUP is committed to playing an active and positive role in all communities in which it operates. Employees should consider the possible impact of business decisions on the wider community and how these might best be evaluated and communicated.

Staff members are encouraged to bring to the attention of the Management, initiatives that can lead to positive and progressive contributions to community development. This will form a part of IPT POWERTECH GROUP's commitment to Corporate Social Responsibility.

## 9 – People Acting on Behalf of IPT POWERTECH GROUP

Where IPT POWERTECH GROUP instructs third parties (i.e., agents, distributors, contractors, etc.) to act on its behalf in any representative capacity, the Manager responsible must draw the attention of such third party to this Code of Business Conduct, and encourage their compliance with this Code in all dealings on IPT POWERTECH GROUP's behalf.

## 10 – Government and Media Enquiries

If employee is contacted by a representative of a government agency or the press seeking an interview or making a non-routine request for documents or information about IPT POWERTECH GROUP, you should give a no-comment response and advise such person that the matter must be referred to the CEO.

Unless you have been specifically authorized to speak to the press you must refer all media enquiries to the CEO.

## 11 – Responsibility for Code Enforcement and Compliance with the Law

IPT POWERTECH GROUP expects its employees to know and follow the applicable laws of the country in which we do business. It is also the responsibility of the company employees to comply with the Code and of managers to ensure that employees are familiar with its terms.

It is the obligation of all IPT POWERTECH GROUP employees to report violations or suspected violations of law or the standards set out in the Code. If you have knowledge of a violation or suspected violation of any law or the Code, contact your manager.

The standards set out in the code will be strictly enforced. Violations will be dealt with severely and in certain circumstances, could result in termination of employment and possible legal prosecution.

## Compliance Statement

*I have received, read and understood the IPT POWERTECH GROUP's Code of Business Conduct. In the course of carrying out my responsibilities, I will comply fully with the Code.*

Employee Name

Job Title

Date

Signature