

Code of Conduct

This Code applies to all members of the Board of Directors, Senior Management and Employees of the Company, whether permanent, contractual or outsourced, at every location where PIBT operates. To the extent practicable, the Company also expects its agents, contractors, consultants, suppliers and other third parties acting on its behalf to observe standards consistent with this Code when engaged in PIBT-related business.

Compliance with this Code is mandatory and not discretionary. This Code is supplemented by, and should be read together with, PIBT's other governing policies. Where a specific policy is more detailed than this Code, the specific policy applies in addition to, and not instead of, this Code.

Salient Features of the Code are:

CORPORATE GOVERNANCE PRACTICES

All employees are required to maintain and support the Company in maintaining the highest degree of Corporate Governance practices.

COMPLIANCE WITH LAWS, RULES & REGULATIONS

We respect the law at all times. Compliance with all applicable laws and regulations must never be compromised. Employees are also expected to comply with all internal rules, policies and procedures applicable in any given situation.

Ignorance of a legal requirement is not a valid defence. Where an employee is uncertain whether a proposed action is lawful or compliant with Company policy, the matter must be referred to the Legal/Compliance function before proceeding.

TRANSACTIONS' TRANSPARENCY

Company ensures that true, fair and timely business transactions must be recorded by maintaining the accounting and financial reporting standards, as applicable to the company.

INSIDER TRADING

Employees are prohibited from trading, or advising others to trade, in the securities of PIBT (or of any other listed company with which PIBT has a business relationship) while in possession of material, non-public information ("inside information") obtained through their role at the Company. Employees must also refrain from "tipping", that is, disclosing inside information to any other person who might trade on it.

Directors, Senior Management and other employees designated as "insiders" or "connected persons" must comply with the Company's Insider Trading Policy and the Securities and Exchange Commission of Pakistan's Insider Trading Regulations, including any applicable trading blackout periods and pre-clearance requirements.

PROTECTION OF COMPANY ASSETS

Employees must never engage in fraudulent or dishonest conduct involving the property or assets of the Company. All employees shall safeguard Company property and make only proper and efficient use of it, protecting it from loss, damage, misuse, theft, fraud, embezzlement and destruction. These obligations extend to both tangible assets (terminal infrastructure, cargo-handling equipment, vehicles, cash and inventory) and intangible assets (trademarks, know-how, proprietary data, software and confidential information).

Information Technology & Cyber Security

- Company IT systems, email and internet access are provided primarily for business purposes; incidental personal use should be reasonable and must never compromise security or productivity.
- Employees must safeguard login credentials, must not install unauthorised software, and must follow the Company's IT Security Policy at all times.
- Any suspected cyber security incident, data breach, phishing attempt or loss of a Company device must be reported to the IT function immediately.

CONFLICTS OF INTERESTS

A Conflict of Interest occurs when personal interests of an employee compete with the interests of the Company. While representing the Company in dealings with third parties, employees shall not allow themselves to be placed in a position in which an actual or apparent conflict of interest exists. Employees are expected to be honest and ethical in dealing with each other, with customers, suppliers, dealers, vendors and contractors to avoid compromises on the ability of transacting business on competitive basis.

CONFIDENTIAL INFORMATION

Confidential information consists of any information that is not, or not yet, public. It includes trade secrets, commercial and marketing plans, engineering and operational data, databases, records, salary information, and any unpublished financial or other Company data. Employees must use best efforts to avoid unintentional disclosure by applying special care when storing, transmitting or discussing confidential information, including in electronic communications, and on a need-to-know basis only.

This obligation continues after an employee's employment with the Company ends. Personal data relating to employees, customers, vendors and other stakeholders must be collected, used and stored only for legitimate business purposes, with access restricted to those who need it, pending the enactment of Pakistan's data protection legislation and in line with prevailing good practice.

ANTI-BRIBERY / CORRUPTION

Employees must never, directly or through intermediaries, offer or promise any personal or improper financial or other advantage in order to obtain or retain a business or other advantage from a third party, whether public or private. Nor must they accept any such advantage in return for any preferential treatment of a third party. Moreover, employees must refrain from any activity or behavior that could give rise to the appearance or suspicion of such conduct or the attempt thereof. Employees should be aware that the offering or giving of improper benefits in order to influence the decision of the recipient, even if he or she is not a government official, may not only entail disciplinary sanctions but also result in criminal charges. Improper benefits may consist of anything of value for the recipient, including employment or consultancy contracts for closely related parties.

RECEIVING OF GIFTS, PAYMENTS

Employees shall not be influenced by receiving favours, nor shall they try to improperly influence others by providing favours. Employees may only offer or accept reasonable meals, hospitality and symbolic gifts appropriate to the circumstances, and must not accept or offer gifts, meals or entertainment where doing so could create the impression of improperly influencing a business relationship.

- No employee shall offer or accept, from any third party, gifts in the form of cash, cash equivalents, loans, kickbacks or similar monetary advantages, regardless of value.
- Gifts or hospitality above a threshold set by management from time to time must be declared and, where required, approved in advance, and recorded in a gifts register.
- Charitable donations and sponsorships must be made transparently, through approved channels, and never used to disguise an improper payment.

EQUAL OPPORTUNITY EMPLOYMENT

The Company believes in providing equal opportunity to all employees. There is no discrimination on the basis of caste, religion, colour, marital status, gender, disability, age or national origin. All policies and practices, including recruitment, promotion and compensation decisions, are administered to ensure equal opportunity for eligible candidates on a merit basis, consistent with the Company's commitment to Board and workforce diversity under applicable SECP requirements.

Health, Safety & Environment (HSE)

As an operator of bulk cargo handling infrastructure, PIBT maintains a goal-oriented Health, Safety, Environment and Quality management system, informed by international standards such as ISO 45001 and ISO 14001 and by applicable Port Qasim Authority requirements.

- Every employee, contractor and visitor must observe applicable health, safety rules and practices, including mandatory personal protective equipment during cargo handling, stockyard and vessel-berthing operations.
- Unsafe conditions, near-misses, incidents, or threatening or violent behaviour must be reported promptly through the established HSE reporting channel.
- Employees must know the applicable emergency response procedures and cooperate fully during drills and actual emergencies.
- Roles designated as safety-critical are subject to a drug- and alcohol-free workplace requirement.
- The Company complies with applicable environmental laws and quality standards, including controls relevant to dust, emissions and effluent management, and employees must promptly report any actual or potential environmental hazard.

HARASSMENT FREE WORKPLACE

The Company respects the personal dignity, privacy and rights of every employee and is committed to maintaining a workplace free from discrimination and harassment of any kind — physical, verbal or psychological. This commitment extends to interactions with contractors, vendors and visitors at PIBT's premises.

WHISTLE BLOWING

All employees are advised to immediately report any improper, unethical or illegal conduct of any colleague or Supervisor through an email at: info@pibt.com.pk