

# PTML

## Anti-Bribery and Anti-Corruption Policy

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### What It Is About:

Pakistan Telecommunication Mobile Limited (PTML/Ufone) is committed to achieving high standards of ethical business conduct based on integrity, transparency and fairness. **We – that is, PTML and its employees and members of the Board of Directors** – understand that bribery and corruption can expose us as well as our business partners to varying legal and strategic risks resulting in financial losses and reputational damage.

Our Anti-Bribery and Anti-Corruption (ABAC) Policy (“Policy”) clearly states:

**PTML exercises a ‘zero-tolerance’ policy for bribery and corruption in all forms. It abides by all applicable local and international anti-bribery and anti-corruption laws. It requires everyone involved in its business to comply with such laws and uphold the highest ethical standards with regard to anti-bribery and anti-corruption.**

### The Policy: Understanding the Context

- Bribery occurs when a person offers, pays, seeks, authorizes, accepts or promises a payment, gift, favour, item of value or a financial, non-financial advantage as well as a commercial advantage from another to influence a business outcome improperly, to induce or reward improper conduct or to gain any commercial, contractual, regulatory or personal advantage. It can be direct or indirect through third parties.
- Corruption may occur by the misuse of a position of trust in order to gain an undue advantage. It may include misuse of entrusted business resources for personal gains, living beyond one’s means, theft of funds and company assets, etc.
- At PTML, we have a top-level commitment to preventing bribery. Compliance with ABAC Policies is ensured through a set of procedures, processes, controls, training & awareness and whistle-blowing mechanism.
- Bribery and corruption on the part of our business partners/associates and third parties may expose us to various risks, even without our involvement. To mitigate the exposure to such risks, PTML, during the course of its business relationship, strives to vigilantly monitor their ethical business conduct and requires them to adhere to the following ABAC Policy Guidelines:

#### 1. Facilitation Payments

- Do not pay/accept or offer to pay/accept any facilitation or "grease" payments to speed up business activities or secure any business for PTML.
- If someone demands or expects an illegal payment, we do not yield to such demand.

#### 2. Gifts, Entertainment, Meals, Travel and Hospitality

- Gifts, entertainment, meals, travel and hospitality may be construed as a form of bribery and corruption if they influence business decisions.

- Do not give or even promise to give or accept lavish gifts, extravagant entertainment, meals, travel, or hospitality to/from any person or entity, to influence business decisions.

### **3. Political Contributions**

- Do not make political contributions for and/or on behalf of PTML.

### **4. Avoiding and Managing Conflicts of Interest (COI)**

- Avoid COI situations, especially in cases involving, whether directly or indirectly, investment, employment and/or business opportunities etc. related to PTML.

### **5. Managing transactions with Intermediaries and Third Parties**

- All third parties that work with or on behalf of PTML must operate in accordance with the standards of ethical business conduct and applicable laws.
- When dealing with intermediaries and third parties, PTML conducts due diligence of their business activities, including, but not limited to, a reasonable investigation into their background, reputation, and adherence to ABAC guidelines and applicable laws.

### **Reporting Violations:**

Any violation of this policy can be reported at [ptmlwb@ufone.com](mailto:ptmlwb@ufone.com) or by calling at + 923340000911 in accordance with [PTML Whistle Blowing Policy](#).