SUBJECT: **CODE OF CONDUCT**

1. Purpose

The purpose of this Code of Conduct is to establish clear standards of professional behaviour, ethical practices, workplace discipline, occupational health and safety, and accountability for all employees of NDE Steel Structures Ltd.

2. Scope

This Code applies to all employees, officers, management personnel, factory workers, project-site personnel, trainees, interns, security personnel, and other individuals working under the Company's supervision. Contractors and visitors must comply with applicable workplace safety, security, and conduct requirements.

3. Core Principles

All employees are expected to demonstrate the following principles:

1) **Integrity:** Act honestly and ethically in all work-related activities.
2) **Respect:** Treat colleagues, supervisors, subordinates, customers, and visitors with dignity.
3) **Accountability:** Take responsibility for assigned duties, decisions, and actions.
4) **Discipline:** Follow Company rules, lawful instructions, and approved procedures.
5) **Safety:** Protect the health and safety of oneself and others.
6) **Professionalism:** Maintain a productive, respectful, and cooperative working environment.

4. Professional Behaviour and Workplace Discipline

All employees shall:

1. Report to work on time and maintain regular attendance.
2. Follow approved working hours, attendance procedures, and leave policies.
3. Perform assigned duties diligently and meet reasonable performance expectations.
4. Comply with lawful instructions issued by authorized supervisors and management.
5. Maintain respectful communication and professional relationships.
6. Avoid fighting, threatening behaviour, abusive language, harassment, intimidation, and workplace violence.
7. Refrain from unauthorized absence, leaving the workplace without permission, or abandoning assigned duties.
8. Cooperate with colleagues and other departments to achieve Company objectives.

5. Occupational Health and Safety (OHS)

Considering the risks associated with NDE steel structure Ltd, safety is a mandatory responsibility for everyone.

5.1 General Safety Requirements

a) Follow all approved safety rules, risk assessments, work permits, and emergency procedures.

b) Wear appropriate personal protective equipment (PPE), including safety helmets, safety shoes, gloves, eye protection, welding shields, hearing protection, and respiratory protection as required by the task.

c) Operate machinery and equipment only when authorized, trained, and competent.

d) Never remove, bypass, or disable machine guards, safety interlocks, or other protective devices.

e) Report accidents, injuries, near misses, unsafe conditions, and equipment defects immediately.

f) Keep emergency exits, fire extinguishers, electrical panels, walkways, and access routes unobstructed.

g) Do not engage in horseplay or any activity that may endanger people or property.

5.2 Production and Fabrication Safety

Employees working in cutting, pre-fitting, fitting, welding, grinding, shot blasting, painting, forming, loading, and related operations must:

a) Follow task-specific safe operating procedures.

b) Use appropriate lifting equipment and approved material-handling methods.

c) Secure steel plates, beams, sections, and other materials against movement or falling.

d) Follow hot-work, electrical safety, and fire-prevention procedures.

e) Ensure proper ventilation and use suitable respiratory protection when exposed to welding fumes, paint vapours, dust, or other hazardous substances.

f) Follow confined-space, work-at-height, and lifting procedures wherever applicable.

g) Never operate cranes, forklifts, hoists, or other lifting equipment without the required authorization and competence.

5.3 Prohibited Safety Practices

The following are prohibited:

a) Working under the influence of alcohol, illegal drugs, or any substance that impairs safe performance.
b) Smoking or using open flames in prohibited areas.
c) Misusing, tampering with, or removing safety equipment.
d) Performing hazardous work without required authorization or protective equipment.
e) Engaging in unsafe shortcuts that may cause injury, damage, or environmental harm.

6. Ethical Conduct and Conflict of Interest

Employees must:

1. Act in the best interests of the Company while performing their duties.
2. Avoid conflicts between personal interests and Company responsibilities.
3. Disclose any actual or potential conflict of interest to HR or authorized management.
4. Never solicit or accept unauthorized commissions, kickbacks, bribes, or personal benefits from suppliers, contractors, customers, or other business partners.
5. Avoid using Company resources, information, or authority for personal gain.
6. Maintain accurate and honest records, reports, attendance information, expense claims, and other official documents.
7. Never falsify documents, manipulate records, or knowingly provide misleading information.

7. Protection of Company Property and Assets

Employees are responsible for protecting Company assets, including machinery, tools, vehicles, computers, furniture, raw materials, finished products, and equipment.

The following are prohibited:

- Theft, fraud, unauthorized removal, or misuse of Company property.
- Unauthorized use of Company vehicles, machinery, tools, or equipment.
- Deliberate damage, negligence, or misuse of materials and assets.
- Unauthorized use of Company funds, fuel, stores, or inventory.
- Personal use of Company property without proper authorization.

Any loss, damage, suspected theft, or misuse must be reported promptly to the relevant department or authorized management.

8. Confidentiality and Information Security

Employees must protect confidential Company information, including:

- Customer and supplier information.
- Engineering drawings, structural designs, and technical specifications.
- Quotations, tender documents, pricing, and commercial information.
- Financial records, payroll, employee information, and HR documents.
- Production plans, procurement records, business strategies, and passwords.

Employees shall not disclose, copy, transfer, photograph, publish, or share confidential information with unauthorized persons. Company information must be accessed and used only for legitimate business purposes.

These obligations continue after employment ends, subject to applicable law and contractual terms.

9. Attendance, Leave, and Timekeeping

Employees must comply with the Company's approved attendance and leave procedures.

a. Attendance must be recorded accurately using the designated system.
b. Proxy attendance, falsification of attendance, and unauthorized manipulation of time records are prohibited.
c. Leave must be requested and approved through the prescribed process, except where applicable emergency procedures provide otherwise.
d. Employees must obtain the necessary permission before leaving work during working hours.
e. Overtime must be authorized and recorded in accordance with Company procedures and applicable law.
f. Employees must not pressure or instruct others to falsify attendance or overtime records.

10. Drugs, Alcohol, Smoking, and Gambling

The possession, use, distribution, or sale of illegal drugs on Company premises or during Company duties is prohibited.

Reporting to work under the influence of alcohol or other impairing substances is prohibited. Smoking is permitted only in designated areas, where provided. Gambling and other disruptive or unauthorized activities during working hours or on Company premises are prohibited, subject to applicable law.

11. Environmental Responsibility and Housekeeping

All employees must contribute to a clean, orderly, and environmentally responsible workplace.

I. Keep workstations, production areas, stores, offices, and walkways clean.
II. Dispose of waste, scrap metal, used containers, paint residues, and hazardous materials according to approved procedures.

III. Prevent unnecessary energy, water, and material wastage.

IV. Report chemical spills, gas leaks, fire hazards, and environmental incidents immediately.

V. Store paints, solvents, gas cylinders, fuels, and other hazardous materials safely.

VI. Follow applicable environmental requirements and the Company's environmental procedures.

12. Use of Information Technology and Social Media

Employees must use Company computers, email, internet access, software, and communication systems responsibly.

a) Do not access, download, or distribute unlawful, offensive, or malicious content using Company systems.

b) Do not share passwords or provide unauthorized access to Company systems.

c) Do not disclose confidential Company information through social media or other communication platforms.

d) Do not publish statements, photographs, videos, drawings, or project information on behalf of the Company without proper authorization.

e) Report suspected cyber incidents, phishing attempts, and unauthorized access to the relevant department.

13. Customer, Supplier, and Visitor Relations

Employees representing the Company must maintain professional relationships with customers, suppliers, contractors, regulators, and visitors.

They shall provide accurate information, protect confidential business information, avoid unauthorized commitments, and comply with approved procurement and commercial procedures.

Visitors and contractors must follow applicable access-control, PPE, induction, and safety requirements while on Company premises or project sites.

14. Reporting Violations

Employees are encouraged to report suspected misconduct, fraud, theft, corruption, harassment, safety violations, environmental hazards, or other breaches of this Code.

Reports may be submitted to:

- The immediate supervisor or department head.
- The Human Resources Department.
- The designated complaint-handling authority or authorized senior management.

All reports shall be reviewed objectively and handled appropriately. Retaliation against a person who raises a concern in good faith or participates honestly in an investigation is prohibited.

Knowingly making a malicious or deliberately false allegation may itself constitute misconduct, subject to fair investigation and applicable law.

15. Investigation and Disciplinary Action

Any alleged violation of this Code may be investigated by authorized Company representatives.

Depending on the nature and seriousness of the established misconduct, the Company may take appropriate action in accordance with its approved policies, applicable employment terms, and relevant Bangladesh labour laws.

Possible actions may include:

a) Counselling or documented advice.

b) Written warning.

c) Further disciplinary proceedings.

d) Suspension or other action where legally permissible.

e) Termination of employment where justified and lawfully carried out.

No disciplinary action shall be imposed automatically merely because an allegation has been made. The employee shall be afforded the applicable notice, opportunity to respond, inquiry, and other procedural safeguards required by law and Company policy.

16. Roles and Responsibilities

All Employees

- Read, understand, and comply with this Code.
- Participate in required training and report violations.

Supervisors and Department Heads

- Communicate the Code to their teams.
- Enforce workplace standards consistently.
- Identify and report safety, ethical, and disciplinary concerns.

Human Resources Department

- Communicate and maintain this Code.
- Conduct awareness sessions and maintain relevant records.
- Coordinate complaints, investigations, and disciplinary procedures in accordance with applicable requirements.

Safety / EHS Personnel

- Communicate safety requirements.
- Monitor compliance with applicable safety procedures.
- Recommend corrective and preventive measures.

Management

- Demonstrate ethical leadership.
- Provide appropriate resources for implementation.
- Review and approve revisions to this Code.

17. Employee Acknowledgement

I acknowledge that I have received, read, and understood the Code of Conduct of NDE Steel Structures Ltd. I agree to comply with its provisions, applicable Company policies, safety procedures, and lawful instructions. I understand that violations may result in appropriate disciplinary action in accordance with applicable law and Company procedures.

Employee Name: _____

Employee ID: _____

Designation / Department: _____

Signature: _____

Date: _____

Approval

Prepared by
Human Resources Department

(Imran Mustafiz)
Managing Director
Date:

Reviewed by:	Management Representative
Name	**:** Md. Tariqul Islam
Signature	**:**