



Bangladesh Engineering & Construction Corporation Ltd. (BECC)

Code of Conduct

INTRODUCTION:

BECC's code of conduct serves as a guideline for our daily business interactions, reflecting our standard for appropriate behavior and our corporate values. The code clearly conveys to each of us that the manner in which we achieve our business results matters just as much as achieving them. The BECC's code of conduct applies to all the BECC's persons, including directors, officers and all employees of the Company.

Most importantly, each employee is responsible for demonstrating integrity and leadership by complying with the provisions of the code of conduct; Global Business practices guidelines, Company policies and all applicable laws. By fully including ethics and integrity in our ongoing business relationships and decision making, we demonstrate a commitment to a culture that promotes the highest ethical standards. Complying with the code is easily to ensure by using good judgment and seeking guidance when questions arise. Each of us is responsible for our decision-making and for our compliance with the code.

If you have any questions or concerns about interpreting or applying the Code of Conduct or any related BECC standard, policy or procedure, you should discuss the situation with your reporting Manager, HRD, Chairman/Managing Director of the company. No adverse action will be taken against anyone for complaining about, reporting, or participating or assisting in the investigation of a suspected violation of the code of conduct, unless the allegation made or information provided is found to be intentionally false. To the maximum extent possible, BECC will maintain the confidentiality of all complaints.

NATIONAL INTEREST:

BECC is committed to benefit the economic development of the countries in which it operates. BECC shall not undertake any project or activity to the detriment of the wider interests of the communities in which it operates.

BECC's management practices and business conduct shall benefit the country, localities and communities in which it operates, to the extent possible and affordable, and shall be in accordance with the laws of the land.



BECC, in the course of its business activities, shall respect the culture, customs and traditions of each country and region in which it operates. It shall conform to trade procedures, including licensing, documentation and other necessary formalities, as applicable.

POLITICAL NON-ALIGNMENT:

BECC shall be committed to and support the constitution and governance systems of the country in which it operates. BECC shall not support any specific political party or candidate for political office. The company's conduct shall preclude any activity that could be interpreted as mutual dependence / favor with any political body or person, and shall not offer or give any company funds or property as donations to any political party, candidate or campaign.

WE WANT TO HAVE EXCELLENT WORKING RELATIONSHIPS:

At BECC, we take pride in the strong personal commitment of our Employee and the excellent achievements that result from that commitment. But this level of commitment can only be achieved in a climate of trust, open and honest communication, and respect. All of your dealings with your peers, your direct reports and your supervisors should be conducted as a partnership, in which each individual's behavior is governed by an overriding commitment to maintaining the highest ethical standards.

Your relationship with those you work should be as a member of a winning team. For dynamic team relationship to work, each individual must fulfill his or her responsibilities and feel assured that others will do the same. This means providing the necessary support to others, at every level, to get the job done. No individual or business unit can place its own priorities before those of the Company.

Your relationship with those you work with or supervise should promote ethics and compliance by setting an example of decency, fairness and integrity. As a leader, you are responsible for clearly defining standards of performance and creating an environment that promotes teamwork and ethical behavior.

WE NEED HONEST COMMUNICATIONS:

Encourage creative and innovative thinking, and if you are a supervisor, treat subordinates as individuals, provide them the freedom necessary to do their jobs. Provide suggestions for performance improvement.



Your relationship with your supervisor should be one of mutual respect and trust. You and your supervisor are a team with the shared purpose of achieving the goals set for your unit by the Company. You are as responsible as your supervisor for ensuring that the communication between you is open and honest. Take the initiative as often as you can. Be innovative in solving problems. Your cooperation and creativity are essential to achieving the goals of your unit and the Company.

WE BELIEVE THAT OUR EMPLOYEE AS OUR GREATEST RESOURCE:

Our commitment to caring for people is manifested in the workplace through a variety of programs designed to promote and reward individual and team achievement. You are encouraged to advance as far as you can and to make a meaningful contribution to the success of the Company. In the end, it is the efforts of our talented and skilled people all over the world that make the success of our business possible.

Specifically, following matters of employment:

- It is the policy, practice and desire of BECC to provide employment opportunities to all qualified persons on an equal basis. The Company will not discriminate against any employee or applicant for employment because of race, color, religion, sex, gender identity, national origin, ethnicity, age, sexual orientation, disability, marital status, veteran status or any other characteristic protected by law in any of the terms or conditions of employment. This includes, but is not limited to recruitment, hiring, promotion, transfer, compensation, training, demotion or layoff.
- We do not use child labor. Child labor is defined as employing any person younger than the minimum age allowed by law of Bangladesh. However, in no event will we knowingly employ anyone younger than Eighteen (18) years of age.
- We maintain an inclusive work environment and achieve excellence by attracting and retaining people of all backgrounds in our workforce.
- We provide performance, festival, profit sharing & promotional opportunities that permit development and career advancement for our entire employee.
- We pay for performance and recognize and reward contributions by individuals and teams that exceed their normal job duties.
- We prohibit sexual or any other kind of harassment of our employee by any person in the workplace or while conducting Company business.
- We strive to avoid favoritism or the appearance of favoritism in the workplace in accordance with the policies and procedures adopted by the Company.



- We strive to eliminate potential hazards from the workplace and to comply with all applicable occupational safety and health laws and standards.
- We help maintain a safe, healthy and productive work environment, for all BECC's Employee and others, by:
 - prohibiting the possession, use, sale or transfer of illegal drugs or drug paraphernalia on Company property or time;
 - prohibiting the conduct of Company business while under the influence of alcohol;
 - prohibiting any acts that could be perceived as violent, threatening, degrading or intimidating, and requiring that any instance of drug or alcohol abuse, violence or unlawful weapons possession be reported to management immediately.

WE AVOID CONFLICTS:

Your judgment is one of your most valuable assets. You should avoid any activity, interest or association that conflicts with or appears to compromise your exercise of independent judgment in the Company's best interests. Conflicts can arise in many situations. It is impossible to cover them all here, and it will not always be easy to distinguish between proper and improper activity. When in doubt, consult your manager, Human Resources or the Chairman/Managing Director before taking any action.

WE PROTECT THE COMPANY'S TRADE SECRET AND CONFIDENTIAL INFORMATION:

BECC's trade secrets, other confidential information and much of its internal data are valuable assets. Protection of these assets, including maintaining their secrecy, plays a vital role in our continued growth and ability to compete. A trade secret is information used in connection with BECC's business that is not generally known or easily discovered, and for which efforts have been made to maintain its secrecy & also other confidential information has to be protected as well.

BECC's trade secrets and other confidential information may consist of any formula, design, device or information that is used in our business and that gives us an opportunity to obtain an advantage over our competitors. Trade secrets and other confidential information cannot be publicly known.

Your obligations with respect to BECC's trade secrets and other confidential information are:

- Not to disclose this information to other employee or third parties except on a "need to know" or "need to use" basis and, in those instances, with confidentiality designations and other data protection mechanisms such as password protection or encryption, as appropriate; and not to otherwise disclose this information.



- Not to engage third parties to handle this information without an appropriate review of the security and information technology controls of the third party.
- Not to post or discuss this information on publicly available websites or social media sites.
- Not to use this information for your own benefit or the unauthorized benefit of persons outside of BECC.
- To take all other reasonable measures to protect trade secrets and confidential information.

If you leave BECC, your obligation to protect BECC's trade secrets and other confidential information. You should also remember that correspondence, printed matter, electronic information, documents or records of any kind, specific process knowledge, procedures, and special ways of doing things. BECC reserves the right to restrict or terminate any user's access or use of company information at any time, for any reason, with or without advance notice, except where prohibited by law.

WE PROTECT PERSONAL INFORMATION:

We respect the personal privacy rights of our employees, consumers, customers, suppliers and other individuals with who has a business relationship. As part of their employment with BECC, employees may provide certain personal information to the company, such as home and e-mail addresses, family information for benefits purposes, and other personal information. We use such information only for the reasons it was supplied to us, unless an employee consents to other uses and as necessary for business purposes and consistent with local laws.

WE ADHERE TO PRESS AND MEDIA REQUEST:

Requests for BECC's financial or business information from the media, press, financial community or the public must be referred to the Managing Director of the company. It is critical that no employee respond to any such inquiry or contact themselves, because any inappropriate or inaccurate response, even a denial or disclaimer of information, may result in adverse publicity and could otherwise seriously affect the Company's legal position.



WE MAINTAIN & PROTECT BECC'S ASSETS, RELIABLE RECORDS AND REPORTS:

Company assets and liabilities should be properly recorded and appropriately valued. Company assets, facilities or services must be used only for lawful, proper and authorized purposes. The theft of money, property or services is strictly prohibited. BECC's equipment, systems, facilities, must be used only for conducting business or for purposes authorized by management. You are personally responsible not only for protecting BECC property entrusted to you, but also for helping to protect the Company's assets in general. You should be alert to any situations or incidents that could lead to the loss, misuse or theft of Company property and you must report all such situations to your manager or Managing Director as soon as they come to your attention.

The financial position of our Company and the results of its operations must be recorded in accordance with the requirements of law through annual budget. Company policy, as well as the law, requires BECC to maintain books, records and accounts that accurately and fairly reflect the nature of the business transactions.

WE DEAL ETHICALLY WITH SUPPLIERS AND CUSTOMERS:

Our aim in conducting our purchasing operations is to ensure continuing, reliable sources of supply.

Honest dealing with customers and suppliers is essential to sound, lasting relationships. We view our suppliers as partners and expect them to make a reasonable profit. Decisions are based on objective criteria such as price and quality, as well as a vendor's reliability and integrity. Giving or receiving any kickbacks, bribes or similar payments of any sort is prohibited.

We extend no personal favors to customers on prices, promotional allowances, marketing assistance or the like; we treat all customers on the same business basis. Dealings with customers and suppliers are discussed in the section of this Code addressing our responsibilities under the competition/antitrust laws.

WE DEMONSTRATE OUR COMMITMENT TO UNIVERSAL HUMAN RIGHTS:

BECC is committed to respect for human rights. BECC practices and seeks to work with business partners that promote the following standards:

- equal opportunity for all employees at all levels regardless of race, color, religion, sex, gender identity, national origin, ethnicity, age, sexual orientation, disability, marital status, veteran status or any other characteristic protected by law in any of the terms or conditions of employment;



- A safe and healthy workplace protecting human health and the environment;
- Paying employees a wage that enables them to meet at least their basic needs, and providing employees the opportunity to improve their skills and capabilities;
- Respecting employees' lawful freedom of association; and
- Working with governments and communities in which we do business to improve the educational, cultural, economic and social well-being in those communities.

HEALTH, SAFETY AND ENVIRONMENT:

BECC shall strive to provide a safe, healthy, clean and ergonomic working environment for its people. It shall prevent the wasteful use of natural resources and be committed to improving the environment, particularly with regard to the emission of greenhouse gases, and shall Endeavour to offset the effect of climate change in all spheres of its activities.

BECC, in the process of production and sale of its products and services, shall strive for economic, social and environmental sustainability.

THE CODE APPLIES TO ALL OF BECC's PEOPLE AND COMPANY ACTIVITIES:

The Code is applicable to everyone who works for the BECC and its subsidiaries, including officers, and also applies to the Company's directors and agents in accordance with applicable law. BECC's code of conduct is available of our website & management team. All of the BECC's employees are need to read, understand and comply with the code of conduct.

However, compliance does not just happen; it requires a commitment from each of us.

THANKS TO ALL

BANGLADESH ENGINEERING & CONSTRUCTION CORPORATION LTD. (BECC)

**National Scout Bhaban (10th floor), 70/1 Inner Circular Road,
Kakrail, Dhaka-1000, Bangladesh.**

Phone: + 88 02 9360568, Fax: +88 02 9360569,

E-mail: beccltd.info@gmail.com, Web: www.beccltd.com