



# **PUNJAB INDUSTRIAL ESTATES DEVELOPMENT AND MANAGEMENT COMPANY**

## **POLICY ON CONFLICT OF INTEREST**



**PUNJAB INDUSTRIAL ESTATES DEVELOPMENT & MANAGEMENT COMPANY**  
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**PUNJAB INDUSTRIAL ESTATES  
DEVELOPMENT AND MANAGEMENT COMPANY**

**CONFLICT OF INTEREST**

**FARHAN MUNAWAR**

Sig: GM (Admin & HR)

**GM (Admin & HR)**

**PIEDMC, (Govt. of the Punjab)**

Revision No: \_\_\_\_\_

Date: \_\_\_\_\_

**PIEDMC - POLICY ON CONFLICT OF INTEREST**

**General**

1. PIEDMC believes that effective governance and operation depend on unbiased decision making by Board of Directors (Board) and staff. In order to avoid impermissible conflict between the personal interests of members of the Board or staff, the Board of PIEDMC adopted the following policies regarding conflicts of interest.

**Objective**

2. The objective of this policy is to ensure that PIEDMC is receiving fair value in the transactions and cases with potential conflict of interests are properly disclosed to avoid or limit the affect on the process of decision making in the best interest of PIEDMC.

**Scope**

3. The conflict of interest policy is applicable to all directors, management employees, contractors and consultants.

**Conflict of Interest**

4. A conflict of interest may exist when a director, employee or member of his or her immediate family has a financial interest in a decision by or on behalf of PIEDMC or when affiliations or other conflicts of loyalties of a director or employee, with or without having any financial interest, may lead to, or suggest influence in, a decision by or on behalf of PIEDMC. This policy is part of the PIEDMC's Code of Conduct.

**Policy**

5. It is the policy of PIEDMC that no member of Board of Directors or any of its Committees, employees shall derive any personal profit, or gain, directly or indirectly, by reason of his or her directorship or employment of PIEDMC, except as authorized by the Board.

6. Each director and employee shall disclose to the Board any personal interest or possible conflict of interest which he or she may have in any matter pending before the Board or any action taken or to be taken by or on behalf of PIEDMC.

7. Each individual covered by this policy agrees that such individual, except as authorized by the Board, will not participate in any decision by or on behalf of PIEDMC that materially benefits;

- (a) such individual,
- (b) a member of such individual's immediate family, or
- (c) any organization with which such individual has a formal relationship (regardless as to whether the organization in question is for profit or no profit).

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8. Notwithstanding the foregoing, with respect to subsection (c) above, members of the Board shall not be prevented thereby from participating in any general policy-making decision (i.e., a decision that is not being made with reference to such organization) by or on behalf of PIEDMC even if such decision will, directly or indirectly, affect such organization.

**Disclosure Statement / Procedure**

9. A conflict of interest disclosure statement shall be furnished annually by each Director and covered employees disclosing any anticipated or possible conflict situation. The covered employees mean the employees who have a decision making role in hiring / contracting or any other employee to whom the Executive Director determines should be a covered employee. Each new Director or employee shall be advised (*through Company Secretary and GM (Admin & HR) for BOD members and employees respectively*) of the policy and he / she should furnish a disclosure statement upon undertaking the duties of such position. (Format attached)

**Implementation and Voting**

10. When any conflict of interest is involved in a matter requiring action by the Board, the interested director shall call it to the attention of the Board and said director shall not vote on such matter. However, the interested person may, if they elect to in their sole discretion, briefly state her/his position on any matter or answer pertinent questions of other Board or committee members since her/his knowledge may be of assistance with respect to the Board's deliberations on such matter. In each such case, the interested person shall recuse him/herself when the vote on the matter is called. If a person recuses him/herself, he/she shall leave the room during the discussion and during the vote on the issue if requested to do so by a majority vote of the Board or applicable committee.

11. When there is a doubt as to whether or not a conflict exists, the matter shall be resolved by a vote of the Board, excluding the potentially interested person.

12. When any conflict of interest may be involved in a matter involving an employee, such employee shall notify the Chief Executive Officer PIEDMC, which shall constitute notice to the Board, and if the conflicted person is the Chief Executive Officer, he/she shall notify the Board Chair.

**Policy review Mechanism**

13. This policy shall be reviewed after every two years by the Risk Committee of the BOD.

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