

Code of Conduct

Being a highly responsible corporate citizen, Aisha Steel Mills Ltd. expects its employees to uphold and enhance the reputation of the Company by:

- maintaining an unimpeachable standard of integrity in all their business relationships both side and outside the Company;
- fostering the highest standard of conduct and competence amongst those for whom they are responsible;
- ensuring transparency in business transactions and rejecting any business practice which might be deemed improper; and
- promoting fair business practices and ensuring compliance with legal and regulator requirements.

In applying these rules, employees should use the following guidelines:

1. Conflict of Interest

- Any personal interest which may affect or might reasonably be deemed by others to affect an employee's impartiality should be declared up front in writing.
- The company's property must not be used for personal work unless specific permission is obtained.
- Each staff member is employed in the company on a full time basis and therefore they should not be involved, directly or indirectly, in any vacation, business or commercial activity. Any departure from this can only be made with the written permission the Chief Executive Officer.

2. Confidentiality and Accuracy of Information

The confidentiality of information received in the course of business must be respected and never be used for personal gain. Information given in the course of business must be honest and never be designed to mislead. Further, all company affairs are to be treated as confidential and should not be discussed with third parties not only during service with the Company but even after departing from service. Interaction with competitors beyond the approved level will be regarded as gross misconduct.

3. Gifts

All staff members are forbidden to accept gifts or borrow money from another staff member of the company or from Dealers, Vendors or customers.

4. Proper Recording of Funds, Assets, Receipts and Disbursements

- I. All funds, assets, receipts and disbursements should be properly recorded in the books of the Company. In particular, no funds or accounts should be established or maintained for purposes that are not fully and accurately reflected in the books and records of the Company.
- II. In principle, all resources and supplies telephone, printing, internet, office van, stationary, other supplies and most importantly office time etc. are for official use.

5. Health & Safety

Every staff member should take reasonable care to ensure the health and safety of him / her and others who may be affected by his / her acts at work.

6. Environment

To preserve and protect the environment, all staff members should:

- design and operate the Company's facilities and processes so as to ensure the trust of adjoining communities;
- promote conservation of resources and waste minimization;
- strive continuously to improve environment awareness and protection; and
- help assist in ensuring minimum wastage of resources.

7. Work Place Harassment

The staff will maintain an environment that is free from harassment and in which all employees are equally respected.

8. Legal Proceedings

It is essential that a staff member, who becomes involved in legal proceedings, whether civil or criminal, should immediately inform his superior with a copy to the CEO in writing.