



2022/2024

BUSINESS CODE OF CONDUCT

SHEAM AVIATION SERVICES LTD.



Department of Strategy & Policy Development

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BUSINESS CODE OF CONDUCT

Sheam Aviation Services Ltd..



Sheam Aviation Services Limited is dedicated for achieving the highest ethical standards and responsible business practices, which ensures our success and the right thing to do.

This Business Code of Conduct ("the Code") is intended to govern how we conduct business throughout the Sheam Aviation Services Ltd. This policy defines the standards to which all employees must adhere as part of their operations.

All employees have a role for upholding the organization's reputation as a responsible business ambassadors and are required to adhere to this code and encourage colleagues to do the same.

This code is not a complete set of rules but a guiding set of business principles to ensure that decisions are made with integrity and compliance. Our policies are reviewed from time to time and all the updates are communicated with the employees and stakeholders accordingly.

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1. Purpose

The Employee code of conduct outlines standards of personal and professional conduct that all employees must strive to uphold and behave in an ethical and professional manner at all times. The Code provides a basis for all employees to maintain a working environment that is productive, positive, enjoyable, safe and free from harassment and discrimination. It will also assist managers to induct employees into the company and address any circumstances that may arise and may conflict with the stated standards and Values.

2. Compliance with Laws, Rules and Regulations

The Employee code of conduct outlines standards of personal and professional conduct that all employees must strive to uphold and behave in an ethical and professional manner at all times. The Code provides a basis for all employees to maintain a working environment that is productive, positive, enjoyable, safe and free from harassment and discrimination. It will also assist managers to induct employees into the company and address any circumstances that may arise and may conflict with the stated standards and Values.

4. Environmental Sustainability

We are committed for reducing the environmental impact of our operations across all of our businesses and operations, including our supply chain management. It is not only the right thing to do, it is also the key to our long-term business success. We will comply with environmental regulations and standards applicable with our operations to reduce environmental pollution and for contributing in environmental protection. Our Environmental Policy reflects our commitment to environmental sustainability

3. Safety

Safety is at the focus of everything in SAVS. Our mission is to comply with local and international laws by ensuring a safe and healthy environment for all our products and employees. We rely on our employees to report any security concerns to us in a timely manner through the appropriate channels.



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5. Data Protection, Privacy and Confidentiality

We attach great importance to the confidentiality of our customers, employees and partners and the security of their personal information. SAvS is committed for maintaining operations that treat individuals' privacy with respect, fairness, transparency, and integrity. SAvS respects the privacy of any information of our customers, employees and partners. All our employees are expected to maintain the highest standards of confidentiality of information and other sensitive data of our customers, employees and partners

6. Cyber Policy

The protection of an organization's information assets is non-negotiable and key to ensuring our competitive advantage. We aim to protect our operations in compliance with applicable laws and regulatory authorities governing our business and members of the public, as well as to provide a secure and resilient environment for the information of our employees, contractors and vendors. We have a robust Security Governance Framework that includes Policies, Standards, Procedures and Guidelines that all employees, contractors, and vendors are expected to comply with

8. Public Statements and Social Media

All SAvS employees are expected to uphold its organization reputation at all times. Our employees should not represent themselves as representatives of any entity within the organization. Our employees are responsible for anything they write, publish or present on social media and must be aware that their views posted on social media could be seen as those of the organization. SAvS employees must comply with the Social Media Guidelines when posting anything on social media

7. Disclosure of Organization Confidential Information

All employees must not disclose SAvS limited confidential information to any third party, verbally or in writing, without obtaining any permission in accordance with internal procedures. If law or regulation expressly requires disclosure of confidential information, the organization must notify the legal entity of the disclosure.



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9. Anti-bribery and Corruption

We are committed to complying at all times with applicable anti-bribery and anti-corruption laws in our countries where we conduct business. All SAVS employees are expected to comply with the Anti-Bribery and Corruption Policy, which forms part of the group's employment conditions. This policy provides clear rules to ensure compliance with applicable anti-bribery and corruption laws. of note, our employees and business partners are prohibited from:

- a)** or receiving bribes in connection with organization business;
- b)** offering or receiving any financial or other advantage to or from another party with the intention to influence or reward the improper performance of an activity; and
- c)** Contributing to any political parties or public international organizations through donations or contributions.

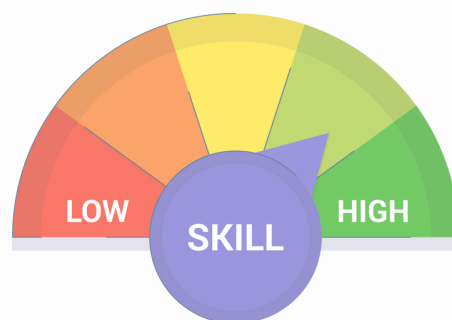
In addition to the above prohibitions, the policy also contains additional guidance for dealing with government officials, lobbying, facilitation payments and acceptable gift and hospitality activity. It is the responsibility of all organization employees to understand and comply with the policy.

10. Professional Development

Employees must continually strive to improve their professional competence, maintain their knowledge and encourage the development of their skills and competence of associates.

11. Sanctions and Trade Controls

We respect and abide by all relevant trade sanctions and import/export restrictions imposed by governments that are applicable to our business. Sanctions and trade controls are official orders applied by one or more countries against a targeted country, group or individual and may include various forms of trade barriers and tariffs



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12. Termination Policy

The Employee Termination Policy of SHEAM Aviation Services Ltd. outlines the procedures and guidelines to be followed when terminating an employee's employment. The policy ensures compliance with the labor laws of Bangladesh and aims to handle terminations with fairness and respect.

Grounds for Termination Employees may be terminated for the following reasons, but not limited to:

- a) Poor performance or failure to meet job expectations.
- b) Violation of company policies, rules, or code of conduct.
- c) Misconduct, including but not limited to dishonesty, theft, fraud, or harassment.
- d) Breach of confidentiality or conflict of interest.
- e) Unsatisfactory attendance or habitual absenteeism.
- f) Insubordination or refusal to follow reasonable instructions.
- g) Downsizing, restructuring, or other organizational reasons.
- h) Completion of a fixed-term contract or probationary period.
- i) Any other valid and lawful reason as per the Bangladesh labor laws.

13. Termination Process

Termination process in SAVS are as terms:

Notice Period: The company will provide the employee with advance notice of termination, as per the labor laws of Bangladesh or as specified in the employment contract. The notice period may vary based on the length of service and the reason for termination.

Severance Pay: If required by the labor laws or employment contract, employees may be entitled to receive severance pay upon termination. The amount of severance pay will be based on the duration of service and any other relevant factors specified in the labor laws.

Final Settlement: The company will conduct a final settlement with the terminated employee, which will include payment for any outstanding dues, accrued leave balances, and other applicable benefits, as per the labor laws and company policies.

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Termination Meeting: In cases of termination, the employee will be invited to a termination meeting with the appropriate HR personnel and the immediate supervisor. The purpose of the meeting will be to explain the reasons for termination, discuss the final settlement, and answer any questions the employee may have.

Return of Company Property: Upon termination, the employee must return all company property, including but not limited to keys, access cards, laptops, mobile devices, and any confidential documents or information.

Exit Interview Employees being terminated may be offered an exit interview to provide feedback on their work experience and identify areas for improvement within the organization. The information shared during the exit interview will be kept confidential and used for improving company policies and practices.

Policy Review This Employee Termination Policy will be reviewed periodically to ensure its compliance with the labor laws of Bangladesh and to adapt to the changing needs of the organization and its employees.

This policy is subject to approval by the management of SHEAM Aviation Services Ltd. Any updates or modifications will be communicated to all relevant stakeholders.

14. Recruitment

SAvS conduct recruitment in the following ways:

The Interview and Hiring Policy of SHEAM Aviation Services Ltd. outlines the procedures and guidelines to be followed during the recruitment and selection process. This policy ensures compliance with the labor laws of Bangladesh and promotes a fair, transparent, and merit-based hiring process.

Job Descriptions Before initiating the hiring process, detailed job descriptions will be created, outlining the roles, responsibilities, qualifications, and experience required for the position.

Internal Posting Job vacancies will be communicated internally to give existing employees an opportunity to apply for internal transfers or promotions.

External Advertisement For positions not filled internally, job vacancies will be advertised externally through appropriate channels, such as the company's website, job portals, newspapers, or other relevant media.

15. Application & Sorting

Application Review All applications received for the advertised positions will be carefully reviewed to assess candidates' qualifications and alignment with the job requirements.

Shortlisting Based on the review, a shortlist of qualified candidates will be prepared for the interview stage.

Interview Panel An interview panel will be formed for each position, consisting of relevant department heads, HR representatives, and other stakeholders, as required.

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.Interview conducting process:

Interviews may include various formats, such as face-to-face interviews, phone interviews, video interviews, or assessment tests, depending on the nature of the position.

Interview Questionnaires: Standardized interview questions will be prepared for each position to ensure fairness and consistency in the evaluation process.

Interview Evaluation: The interview panel will evaluate candidates based on their qualifications, experience, skills, and alignment with the company's values and culture.

Reference Checks: For candidates who pass the interview stage, reference checks may be conducted to validate their employment history and qualifications.

Job Offer: A formal job offer will be extended to the selected candidate, outlining the terms and conditions of employment, including compensation, benefits, start date, and any other relevant details.

Employment Contract: Each new employee will be required to sign a written employment contract that outlines the terms and conditions of their employment, in compliance with the labor laws of Bangladesh.

Policy Review: This Interview and Hiring Policy will be reviewed periodically to ensure its compliance with the labor laws of Bangladesh and to adapt to the changing needs of the organization.

16. Final Settlement

Final Settlement The company will conduct a final settlement with the self resign/terminated employee, which will include payment for any outstanding dues, accrued leave balances, and other applicable benefits, as per the labor laws and company policies.

17. Retirement

Every employee shall retire on attaining the age of sixty-six years. In the absence of a birth certificate, the date of birth given at the time of joining will be deemed to be the age for the purpose of determining the retiring age. The company may in special circumstances and its sole discretion after a further period of employment beyond the age of sixty-six years.



18. Equal Employment Opportunity

We are proud to have an inclusive and diverse workforce, where people from all cultures and backgrounds around the world comes together for contributing to the success of our business. To support this, we ensure that equal opportunities are provided for employment, development, and promotions.



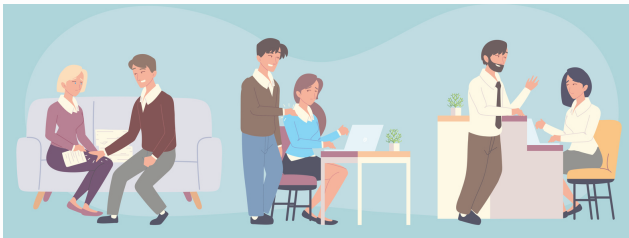
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19. Harassment and Bullying

We are committed to providing a workplace that is free of harassment and bullying, and where everyone is treated with dignity and respect. SAVS does not tolerate any form of harassment and bullying behavior on any grounds. Bullying is an unacceptable conduct within the company and all reported incidents would be investigated. While it is the responsibility of all SAVS employees to ensure that SAVS premises and facilities are free from harassment, high officials/managers have a particular and clear responsibility to meet this requirement. Managers who become aware of serious breaches of policy must immediately notify their manager or the Executive Council.



20. Conflict of Interest

We protect employees and the business by providing the means to identify declare and manage any actual, potential, or perceived conflict of interest. We acknowledge that employees may have business interests outside of their role with the company and recognize that financial investment in another venture and other business interests may be acceptable providing it does not compete and is not in conflict with the interests of the organization having a personal relationship with other employees, candidates, customers, suppliers, regulators, or competitors does not necessarily give rise to a conflict of Interest, but where it may or does, it should be declared. Failure to declare an actual, potential, or perceived conflict of Interest, may result in disciplinary action up to and including termination to protect our interests and of those involved

21. Record Management

Employees need to be aware of their record keeping responsibilities and are well informed that there is a legal requirement for adhering of proper records management practices and procedures. All employees must therefore instructed that company documents should not be placed in unofficial or private filing systems. Instead of it should be placed in official files. Employees must not remove documents from official files without proper instructions from his supervisors or from any senior officials. Employees are to be instructed well about record keepings, and it must be maintained, up-to-date on regular basis and they will be capable enough for providing organizational accountability when officially scrutinized. Employees must not damage, dispose of, or in any other manner, interfere with official documents or files. The destruction of records may only take place in accordance with a disposal and retention schedule.

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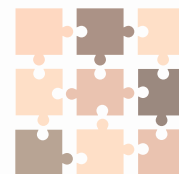
22. Reporting & Accountability

Making proper decisions can be difficult in our complex business environment. You may occasionally need to seek advice or assistance in order to resolve an issue. You are encouraged to seek information or guidance about our ethics and compliance standards. Reliance is a non-retaliatory environment, Making it safe for employees to raise ethics and compliance concerns in good faith. Our non-retaliation policy is actively supported by our board of Directors and senior management.



23. Discrimination and Equal Employment Opportunity

Anti-discrimination laws provide guidelines on respecting personal difference. Treating people differently based on personal characteristics is unlawful. The following are examples of attributes: age, industrial activity, parental status, political belief, personal association, race, ethnic background, carrer status, marital status, pregnancy/potential, lawful sexual activity, unrelated criminal record, impairment, religious belief/activity, physical features, gender identity, disability and sex



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24. YOUR RESPONSIBILITIES



- Seek help if you are ever unsure on a course of action.
- NO ONE, even senior officers, has the authority to tell you to do something illegal or unethical.
- Raise concerns about any violations of our Code that you see or suspect.
- Never retaliate against anyone who makes a good faith report of suspected misconduct.
- Cooperate fully and honestly in any internal investigation of alleged misconduct.

By the order of the Executive Council

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The END



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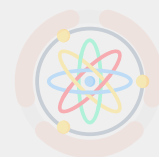
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