



TDEA Human Resources Manual

As Updated on: January 07, 2023

List of Abbreviations and Acronyms

CEO	Chief Executive Officer
COI	Conflict of Interest
CPF	Contributory Provident Fund
CRC	Conflict Resolution Committee
CSO	Civil Society Organization
CV	Curriculum Vitae
FAFEN	Free and Fair Election Network
HR	Human Resources
IDC	Internal Disciplinary Committee
MoV	Mean of Verification
OPD	Out Patient Department
PRF	Personnel Requisition Form
ToR	Term of Reference
TDEA	Trust for Democratic Education and Accountability

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1. PURPOSE OF THE MANUAL¹

This manual summarizes all major human resources policies and procedures that are currently in force at the Trust for Democratic Education and Accountability (TDEA). Any terms and conditions of employment not covered, in part or in whole, in this manual shall be subject to the provisions of labour legislation effective in Pakistan. The manual intends to serve as a reference guide for all employees on TDEA's human resources policies and procedures, as well as on the rationale behind and the principles underlying their implementation and enforcement. The provisions stipulated in this manual shall be subject to change from time to time at the discretion of TDEA's Board of Trustees, hereafter referred to as the "Board".

1.1. Introduction

TDEA recognizes the contributions of its employees and treats each individual employee fairly and consistently in all matters, with uniform application of human resources principles as defined in Section 2.

1.2. Approval and Maintenance

The Board can amend, delete, replace or add any human resources policy in this manual through resolutions. The Human Resources (HR) Unit is responsible for updating this manual in line with the Board's resolutions.

1.3. Communication/Distribution

The Human Resources Manual shall be uploaded on TDEA's website. The HR Unit shall also provide its electronic copy to all TDEA units and projects. All employees shall be notified through e-mail whenever the Board approves any change(s) in the manual.

1.4. Non-Substantive Changes

TDEA's Chief Executive Officer (CEO) is authorized to approve non-substantive changes to this manual, including the following:

- Numbering.
- Title pages.
- Appendices/Links containing examples or guides.
- Table of contents.
- References.
- History part of individual sections.
- Grammar or style in a manner that does not affect content, meaning or interpretation.
- Punctuation like adding a comma or an apostrophe.
- Format of the document.
- Titles of staff, sections or divisions where the change affects only internal operations and does not impact employee or employer rights or responsibilities.
- Consistency between the manual's provisions and the Board's resolutions.

1.5. Review Cycle

The Human Resource Manual may be reviewed as and when required.

¹ Effective date of implementation: May 26, 2018.

2. HUMAN RESOURCES PRINCIPLES²

TDEA recognizes the contributions of its employees and treats each individual employee fairly and consistently in all matters, with uniform application of the following human resources principles:

- Human resources are best allocated to achieve optimum productivity and efficiency.
- Pay and benefits offered are fair, equitable and competitive.
- The employees are encouraged to equip themselves for their present job, as well as for TDEA's future development.
- Reward is based on merit. High performers are given priority in taking up more responsible positions.
- Two-way communication between the employees and the management is promoted as a means of building mutual understanding and trust.
- Workplace safety is given top priority to protect human health and enable the employees to give their best performance.
- The employees' freedom of speech and association is respected as long as it is within the legal boundaries.
- Equal opportunities of employment are practiced. There is no discrimination on the basis of race, color, ancestry, nationality, ethnic origin, place of origin, creed, religion, age, disability, sex, sexual orientation, gender identity, marital status, family status, political belief, political association and social condition, provided that these do not impede the ability of prospective appointees to carry out normal job duties or affect the health and safety of fellow employees).
- Affirmative action to uphold the protection for females, transgender, disabled persons, and persons from backward and far-flung areas.

² Effective date of implementation: May 26, 2018.

3. EMPLOYMENT POLICY³

It is TDEA's policy to recruit the best qualified people and maintain a pool of human resources as per its current requirements and future needs. TDEA also aims to transfer/promote well performing and capable employees to fill vacancies, so that they are provided with opportunities to widen their exposure and advance in their career development within the organization.

The job applicants are treated fairly and equally. Employment is offered only to the best qualified applicants with reference to their merits and abilities to meet the requirements of the job. The HR Unit provides recruitment advice and services to all divisions/departments and is responsible for the entire process leading to employment. TDEA shall not be bound by offers of employment other than those extended by the HR Unit.

³ Effective date of implementation: May 26, 2018.

4. HUMAN RESOURCES AND CONTROL⁴

4.1. Purpose

The aims of TDEA's human resources planning are to:

- Ensure that the organization acquires and retains the optimum number of employees with the required skills, expertise and competence.
- Exercise effective control of staffing and the associated cost.
- Assist in optimum resource allocation so that potential human resources surplus or shortage could be anticipated and alleviated as much as possible.

4.2. Human Resources Plan

The directors are required to conduct a thorough review of the operations, structure and human resources of their units at the time of preparation of annual budget, and furnish recommendations for the human resources plan for the next financial year to the HR Unit.

This plan shall include positions by level that are to be funded by TDEA through its non-project funds, as well as all positions to be funded by projects as approved on June 30 of the preceding financial year. The HR Unit is responsible for preparing TDEA's human resources plan for the next financial year.

4.3. Changes to Approved Human Resources Plan

The Human Resources plan for the next financial year, once approved by the Board, is regarded as official. However, the Board in its quarterly meetings may approve amendments to the plan in case of major developments or in line with TDEA's functional requirements.

4.4. Human Resources Control

In order to optimize human resources utilization and maintain cost effectiveness, stringent HR control shall be exercised, and the recruitment shall only be carried out in accordance with TDEA's operational and program needs.

⁴ Effective date of implementation: May 26, 2018.

5. RECRUITMENT POLICY⁵

5.1. Purpose

The purpose of recruitment at TDEA is to acquire, in a cost effective manner, the optimum number of qualified employees as required by the approved Human Resources Plan, and different programs and projects. The following guidelines seek to ensure transparency and fairness throughout the recruitment process and maximize diversity of applicants.

5.2. Human Resources Committee

The Human Resources Committee shall be appointed by the Chief Executive Officer for a period of two years and may comprise at least three staff members of grade D and above including one female staff member. ⁶The Committee will ensure that the vacancies are filled in line with the institutional commitment to participation and emancipation of women, persons with disabilities and members of minority communities. The Committee will also adopt measures to ensure that the staffing reflects geographic and ethnic diversity as far as practicable.

5.3. Types of Appointments

5.3.1. Long-Term Contract

All appointments for a minimum period of one year shall be considered as a long-term contract. The long-term employees shall be eligible to staff benefits including Life and Health Insurance, Contributory Provident Fund (CPF), and all types of leaves.

5.3.2. Short-Term Contract

All appointments for a period of less than one year shall be considered as a short-term contract. The short-term employees shall be eligible to avail Life Insurance and all types of benefits including Health Insurance, Contributory Provident Fund (CPF), and all types of leaves on a pro-rata basis subject to availability of funds. ⁷

5.3.3. Consultants

For external technical services, TDEA may hire consultants as and when necessary. The consultants shall be hired in line with the organization's Procurement Policies.

5.3.4. Interns/Volunteers/Part-Time Staff

TDEA may hire Interns, Volunteers and Part-Time Staff from time to time on the following terms and conditions:

5.3.4.1. Intern

An intern shall primarily work for his/her own benefit in order to gain experience, as well as for TDEA's benefit. Interns may be paid a reasonable stipend at the rate notified by the Finance Unit annually. Intern will be entitled to life insurance benefit for the period of internship with TDEA. ⁸

⁵ Effective date of implementation: May 26, 2018.

⁶ Amended in 48th Meeting of Board of Trustees: January 07, 2023

⁷ Amended on 32nd Meeting of Board of Trustees: August 03, 2019

⁸ Added on 47th Board of Trustees meeting: January 07, 2023

5.3.4.2. Volunteer

A volunteer shall actively take on a task without promise, expectation or receipt of compensation. TDEA may issue certificates/appreciation letters for the services rendered.

5.3.4.3. Part-Time Staff

A part-time employee shall work for less than 40 hours per week. He/She shall be paid in line with his/her level of effort as defined in the contract.

5.4. Levels of Appointment

The different levels of appointment in accordance with the level of seniority and responsibility have been presented in the following table:

Category	Level	Grade	Minimum Education and Experience
Senior Management	Chief Executive Officer	A	Master's or above in relevant field with 16 years' experience, of which 10 years at senior management level of relevance to TDEA programs
	Director	B	Master's degree in relevant field with 14 years' experience, of which 10 years at senior management level of relevance to TDEA programs
	Deputy Director	C	Master's or above in relevant field with 12 years' experience, of which 8 years at senior management level of relevance to TDEA programs
Management	Team Lead	D	Master's degree in relevant field with 10 years' experience, of which 4 years at management level of relevance to TDEA programs
	Deputy Team Lead	E	Master's degree in relevant field with 7 years' experience, of which 3 years at management level of relevance to TDEA programs
	Thematic Lead	F	Master's degree in relevant field with 6 years' experience, of which 2 year at management level of relevance to TDEA programs
Mid-Level Management	Deputy Thematic Lead	G	Master's degree in relevant field with 5 years' experience, of which 1 year at management level of relevance to TDEA programs
	Senior Officer	H	Master's degree and 4 years' experience in relevant field
	Officer	I	Preferably Master's degree and 3 years' experience in relevant field
Junior Staff	Junior Officer	J	Preferably Master's degree in relevant field with 2 years' experience or Bachelor's degree with 4 years' experience in relevant field
	Assistant	K	Preferably Fresh Master's degree in relevant field or Bachelor's degree with 2 years' experience in relevant field
Support Staff	Skilled Support Staff (Cook, Driver etc)	L	Preferably Matriculation with prerequisite skills, experience, certification, licensing documents, 5 years' professional experience, etc.
	Non Skilled Support Staff (Office Boy/ Office Support Chowkidar / Office Cleaner/ Gardener)	M	Primary with relevant experience

As concerns the table above, 16 years of education (Bachelor's degree) shall be considered equivalent to Master's degree in certain cases (in order to cater to maximum number of best performing employees) and included in the selection criteria.

5.5. Personnel Requisition Form

The relevant supervisor/manager shall complete and forward a Personnel Requisition Form (PRF) – *attached as Annex No. 2* – to the HR Unit. The form shall include terms of reference (ToRs) of the requisitioned position on the defined format approved by the relevant director.

After the HR and Finance Units have reviewed the recruitment request, the former shall employ the most efficient means to submit the PRF to the Human Resources Committee. The PRF shall include the following information:

1. Project.
2. Position.
3. Grade.
4. ToRs.

The Human Resources Committee shall decide on one or more of the methods of sourcing for filling the requisitioned position as described in Section 5.5 and inform the HR Unit accordingly.

If the PRF requests additional employee(s) who are not budgeted and not approved as part of the Human Resources Plan, the HR Unit shall seek the CEO's approval and submit the PRF to the Human Resources Committee. The Board may grant ex-post facto approval to such positions at its quarterly meeting.

5.6. Sourcing

One or more of the following sourcing methods may be adopted to identify suitable candidates:

5.6.1. Internal Sourcing

5.6.1.1. Competition among Staff

The HR Unit shall issue an internal vacancy announcement to invite applications from employees.

5.6.1.2. Transfer

The HR Unit shall follow the procedure as provided in Section 7 in case the Human Resources Committee decides to fill the vacancy through transfer, which may include staff of partner organizations.

5.6.1.3. Promotion

The HR Unit shall follow the procedure as provided in Section 8 in case the Human Resources Committee decides to fill the vacancy through promotion.

5.6.2. External Sourcing

The HR Unit shall adopt one or a combination of external sources of recruitment that is/are considered most appropriate and cost effective. It may consult the Human Resources

Committee and/or the relevant supervisor/manager before taking the decision. The external sources of recruitment may include the following:

5.6.2.1. Advertising the Post

Advertising the post helps communicate clearly and openly to the public the requirements of the position and the selection criteria. Some of the methods used for advertising the post are:

1. Advertising in newspaper(s), journals and/or other publication(s).
2. Advertising on TDEA website and/or recruitment website(s) as appropriate.
3. Social Media.
4. Appointment services of universities, college and related programs.
5. Any other medium.

5.6.2.2. Executive Search via Third Party Sourcing

Recruitment consultants can tap into private sector networks and they are skilled at promoting opportunities to potential candidates. They can reach a wide pool of candidates and can reduce the time burden on TDEA.

5.6.2.3. Professional Referrals

Professional referral is one of the most widely used methods for identifying potential candidates in both public and private sectors. Possible referral sources may include TDEA staff members and senior executives of other public, private and non-governmental organizations. The HR Unit, in consultation with the Human Resource Committee, may recommend one or more candidates. In case of multiple candidates, they shall undergo an assessment process according to TDEA's policies. The HR Unit shall document reasons for opting for this method of sourcing.

5.6.2.4. Partner Organizations' Recommendations

Considering project requirements and in the interest of effective field implementation, recommendations for recruitment may be sought from partner organizations with which TDEA has any contractual arrangement. The Human Resource Committee shall decide about the selection process for such recruitments.

5.7. Recruitment Committee

If the Human Resources Committee opts for external sourcing or competition among staff, a Recruitment Committee shall be formed comprising a minimum of three staff members, including the relevant manager to be nominated by the CEO. External subject experts may also be included. The head of the HR Unit shall facilitate the Recruitment Committee, while the relevant manager shall head it. The Committee shall be responsible for the following:

5.7.1. Finalizing the Selection Criteria

The Recruitment Committee, in consultation with the HR Unit, shall determine the selection criteria before the initiation of external sourcing or competition among staff. One or all or a combination of factors may be considered in determining the recruitment criteria (*table below*):

Sr. No.	Criteria	Maximum Weightage
1.	Cover Letter	Up to 20
2.	Educational Qualifications	Up to 40

3.	Relevant Experience	Up to 40
4.	Written or Skill Test (Typing Speed, Presentation, Driving, etc.)	Up to 60
5.	Interview	Up to 60

Criteria development means determining factors that shall be used and how these factors shall be scored during the interview. The criteria shall be related directly to the job analysis and job specifications. Some aspects of the job analysis and specifications may be the actual criteria.

This involves discussion between the HR Unit and the Recruitment Committee on which skills, abilities and personal characteristics are required to be successful at any given job. By developing the criteria before reviewing any résumés, the HR Unit and the Recruitment Committee can be sure that they are being fair in selecting candidates for the interview.

5.7.2. Longlisting of Candidates

The long-listing of all received applications shall be conducted by the HR Unit keeping in view the requirements of qualification and experience for the position. The long-listing shall be conducted on the basis of the following factors before submission to the Recruitment Committee for shortlisting:

1. Suitability expressed in Cover Letter.
2. Curriculum Vitae (CV) / Résumé tailored to respond to the advertised job⁹.
3. Minimum qualifications.
4. Total work experience.

5.7.3. Shortlisting of Candidates

The shortlisting shall be done by the Recruitment Committee based on the following factors:

1. Technical qualifications of applicants are in line with the requirements of the advertised position.
2. Work experience of applicants is relevant to the requirements of the position.
3. If applicable, management experience of applicants is appropriate for the requirements of the advertised position.

The Recruitment Committee shall submit the list of shortlisted candidates to the HR Unit, which shall review the list to ensure that the shortlisted candidates meet the requirements of the advertised position. In case, the HR Unit has reservations on any shortlisted candidate, it shall seek reasons in writing from the Recruitment Committee. The HR Unit shall record any disagreement in writing. The final determination of candidates to be invited for assessment rests with the HR Unit, which shall call the shortlisted candidates for assessment process via email and/or telephone call.

5.7.4. Conducting Written and Skill Tests and/or Interviews

5.7.4.1. Written and Skill Test

As determined by the Recruitment Committee, the shortlisted candidates shall undergo a written/skill test that shall be of two hours maximum. The test shall be designed to assess subject comprehension, job understanding, general knowledge and language proficiency of the applicants. The development of test shall be the responsibility of the relevant director or

⁹ Repealed on 47th BOT meeting: January 07, 2023 “Curriculum Vitae (CV) / Résumé tailored to respond to the advertised job.”

any other staff in Grade B and above, who shall submit the test along with the answers key to the HR Unit a day before the test date.

However, in case the relevant director is on the Recruitment Committee, the HR Unit may solicit any internal or external services for the development of the test. The HR Unit shall keep the test in safe custody and shall only share it with the candidates. Moreover, the HR Unit may assign any staff of relevant expertise to score the tests.

5.7.4.2. Interview

The interview schedule shall be developed by the Recruitment Committee in close collaboration with the HR Unit. During the interviews, the interviewers shall only ask pre-defined questions or the ones that relate directly to the job requirements. Where it is necessary to assess whether personal circumstances shall affect job performance, the interviewers shall objectively discuss these without questioning the candidates about their age, marital status, pregnancy, family status, race, nationality or religion (*Interview Evaluation Form attached as Annex No. 7*).

In case of a disabled applicant, job-related information on disability and medical history can be sought to determine his/her ability, and the need for special services and facilities to carry out normal duties. It is, however, unlawful to request medical information for the purpose of discriminating against applicants on the basis of pregnancy or disability. Each member of the Recruitment Committee shall independently mark the candidates and submit the evaluation sheets to the HR Unit with one of the following recommendations:

1. Recommended for hiring (in order of priority, up to three).
2. Not recommended for hiring.

In case the Recruitment Committee's recommendations do not provide a clear decision, the HR Unit may decide to call selected candidates with highest scores for a second interview. Moreover, the HR Unit shall check all original academic and professional degrees and certificates, reference letters from previous employers and any other relevant documentation as requested in their call for interview. A candidate who has not provided these documents in original shall not be assessed.

5.7.5. Furnishing Recommendations for Recruitment

The HR Unit shall consolidate the marking for each candidate against the criteria determined by the Recruitment Committee along with the final recommendations by the members. A comparative sheet shall be presented to the Recruitment Committee for discussion and finalization of prioritized recommendations for the CEO's approval. In case the process has not yielded any candidate for hiring, the HR Unit shall revert the case to the Human Resource Committees for the adoption of appropriate measures in line with TDEA's policy.

Before submission to the CEO for approval, the HR Unit shall ensure that the recruitment process has been conducted in line with TDEA's recruitment policy, as well as document its comments on the integrity of the process. This shall be certified by the head of the HR Unit. The Comparative Sheet for Recruitment (*attached as Annex No. 6*) along with the HR Unit head's comments shall be presented to the CEO for approval.

5.8. Offer and Approval

After the CEO's approval, the HR Unit shall prepare an offer letter for the prospective employee that includes the following information:

1. Project.
2. Position.
3. Grade.
4. Salary.
5. Fringe benefits (if applicable).
6. Date of joining.

The determination of salary offer shall be made on the basis of one or a combination of the following factors:

- Recent earnings/Last drawn salary.
- Prevailing market rate of the vacant position.
- Job grade, salary range and available budget of the vacant position.

In case a prospective employee declines the offer, the HR Unit shall make the offer to the next candidate on the recommendations approved by the CEO.

5.9. Reference Checks

On receiving the verbal/written consent of the selected candidate, the HR Unit shall conduct reference checks with their current/previous employer as far as practicable, before formally sending the offer letter.

If a candidate/employee is found to have provided false information or have misrepresented any information or have not disclosed any material facts in his or her application, it shall be deemed to be sufficient grounds for TDEA to withdraw the offer or immediately terminate his/her services, as the case may be (*Reference Check Form attached as Annex No. 3*).

5.10. Employment Formalities

At the time of joining, the HR Unit shall ensure that the candidates produce all originals of their academic and professional credentials, reference letters from previous employers and other relevant documentation as stated in their CV/application. The HR Unit shall attest all copies of the same documents and shall mark them as "originals seen". The copies shall be placed in employees personal files for record.

For prospective employees who require an employment visa to work in Pakistan, the offer of appointments shall be subject to their obtaining a valid employment visa from the Government of Pakistan. The HR Unit shall assist in the process of visa application when necessary. The employees are required to sign a confidentiality undertaking as a condition of employment.

5.11. Requirements for Disclosure

To promote the culture of transparency and accountability, staff in Grade B and above shall disclose the following information after signing the contract:

- Annual Wealth Statement.
- Annual Income Tax Return.
- Any association, membership or other form of engagement with government and/or non-governmental entity.

TDEA, on receiving their consent, may publish or upload the same on its website and/or any of its publications or public presentations (*Disclosure of Affiliations Form attached as Annex No. 1*).

5.12. Reporting Duties and Orientation

On their first day of employment, new recruits shall report to the HR Unit to complete the employment formalities and attend a brief orientation session before they report for duty to the designated unit.

5.13. Record of Service

Service record/personal files of all the staff members shall be maintained and updated by the HR Unit (*Personal File Checklist attached as Annex No. 4*). The documentation shall include:

1. Duly filled-in Job Application Form (*Annex No. 5-A or Annex No. 5-B*).
2. CV of the employee, supported with all the necessary documentation, including copies of educational testimonials, experience certificates and record of other achievements.
3. Interview Evaluation Form (*Annex No. 7*).
4. Comparative Sheet for Recruitment (*Annex No. 6*) duly signed by the recruitment committee.
5. Duly filled-in Employee Information Form (*Annex No. 8*).
6. Acknowledgement of Receipt of Policies and Procedures Manual (*Annex No. 9*).
7. Conflict of Interest Disclosure Forms (*Annex No. 10-A and Annex No. 10-B*).
8. Joining Report (*Annex No. 11*).
9. Designation of Beneficiary Form (*Annex No. 12*).
10. Acknowledgement of Code of Ethics and Conduct (*Annex No. 30*).
11. Copy of National Identity Card.
12. Copy of contract/letter of employment duly signed by the employee.
13. Record of probation appraisal, annual performance appraisal, promotions, increments, etc. as and when applicable.
14. Record of training acquired during period of employment.
15. Disciplinary action proceedings along with details of penalties imposed, if any.
16. Copy of driving license (for authorized drivers only).
17. Any other relevant documentation (*New E-mail ID Form attached as Annex No. 13*).

Although each personal file will be treated as confidential, it shall be accessible to the CEO, the HR focal person, internal auditor and the concerned staff member. The head of the HR Unit shall periodically review the service record/personal file checklists to ensure that these are complete.

The frequency of these reviews shall be at the time of new hiring and at least once every quarter. Such reviews shall be evidenced through signatures and date of review by the head of the HR Unit. For any documents that are missing or removed from personal files, a log shall be maintained.

5.14. Recruitment Process for Chief Executive Officer

The Board appoints the CEO through a majority vote for a period of three years. Similar procedure is adopted in case of extension of the tenure of the incumbent. The procedure for the termination is also similar.

When the CEO's post becomes vacant, recruitment procedures as laid down in the HR Manual shall be followed and/or as decided by the Chairperson of the Board. The Board shall interview the shortlisted candidates and take a decision through a majority vote.

5.15. Recruitment Process for Interns/Volunteers and Part-Time Staff

Staff under this category will be hired via recommendations given by relevant Supervisor, which will be approved by the relevant unit head. Such appointments may undergo test and interview if deemed necessary by the relevant unit head.

In consideration with the organization's requirements, only CEO shall have the authority to appoint such staff.

6. PROBATION¹⁰

All new employees shall undergo a one to three-month probationary period. This enables:

- The employee to assess whether he/she enjoys the work environment and opportunities provided by TDEA.
- The supervisor/manager to assess whether the employee has the ability, initiative and skills required to productively function in his/her newly appointed position.

The HR Unit shall ensure the following:

- The supervisor to set and communicate clearly defined outputs and deliverables to the new employee for the probationary period within two days of his/her joining. The supervisor to also communicate agreed deliverables and outputs to the HR Unit.
- The employee's performance to be assessed and he/she be given reasonable evaluation, instruction, training, guidance and counselling in order to allow him/her to render satisfactory services.
- In case a former employee re-joins TDEA in the same unit or in a capacity in which the job nature is similar to his/her previous position with TDEA, the probationary period may be waived off after the recommendations of the Human Resources Committee.
- If an employee re-joins TDEA in a different unit or in a position where the job nature is different from his/her previous position, a probationary period will be required in order to ensure that the employee is suitable for the job.
- The decision to terminate the services of a probationer to be preceded by a full consultation with the employee who has the right to representation.
- A dismissal can take place at any stage of the probationary period and the level of substantive fairness for probationers to be seen as the same as that for long-term, short-term or part-time employees.
- During the probationary period, the employees to be allowed all leave on pro-rata basis (for example, one casual leave a month).
- In case employment is not confirmed after the probationary period, the employee will not be eligible to avail CPF, or medical expenses.
- During the probationary period, the notice period required to terminate employment by either TDEA or the employee not to exceed one week for new employees and one month for existing employees placed on probation.

6.1. Procedure

The supervisor shall ensure that the following requirements have been met:

- Discussion has taken place on the probationer's job description, including the expected outputs, activities and deliverables.
- Agreement has been reached between him/her and the probationer on the outputs, activities and deliverables, following which both have signed the job description.

The following requirements shall be met in the last month of the probationer's employment:

¹⁰ Effective date of implementation: May 26, 2018.

- The supervisor to evaluate all the deliverables and provide recommendation to HR Unit.¹¹ The supervisor to furnish his/her recommendation after completing the assessment on the given Performance Appraisal Form.
- The Performance Appraisal Form to be forwarded to the HR Unit.
- The HR Unit to verify that the appraisal has been conducted on the deliverables/ outputs assigned to the employee by his/her supervisor at the time of joining and may request the supervisor to furnish relevant means of verification (Mo's).
- After ensuring that the performance appraisal has been done fairly and in line with the relevant TDEA policy, the HR Unit to complete its rating and forward the completed Performance Appraisal Form to the relevant director for approval.
- Subject to the approval of the relevant director, the HR Unit to issue the letter of confirmation or termination to the employee, as the case may be.

6.2. Extension of Probation Period

The period of probation may only be extended if an employee on probation has been unable to meet expectations because of factors that are force majeure. Only one-time extension to the period of probation may be granted, which shall not exceed four weeks. The following procedure shall be followed when probation is extended:

- The supervisor to seek approval of the HR Unit through email justifying the need for extension.
- The supervisor to inform the employee of the reason why it is necessary to extend the probationary period (based on facts).
- The HR Unit to develop an action plan for both the supervisor and the employee with their consultation, and specify responsibilities and duties of both in order to achieve the expected outputs/deliverables.
- The HR Unit to give the employee a letter informing him/her of the extension of the probationary period. The action plan will be attached to this letter and the employee will sign an acknowledgement of its receipt.
- The employee to again be appraised before the end of the probationary period in line with the procedure defined in Section 6.1.

¹¹ Amended on 47th Meeting of Board of Trustees held on January 07, 2023.

7. TRANSFER¹²

7.1. Purpose

Internal transfer is encouraged by TDEA since it gives employees opportunities to widen their exposure and pursue development in other streams within the organization. It also enables TDEA to deploy employees to areas where they can best contribute to and meet its human resources requirements and planning.

7.2. Policy and Procedure

It is TDEA's policy to consider internal transfer for existing employees whenever a suitable job opportunity arises. The purpose of transfer can be to retain the outstanding performers and utilize the available talent to its fullest. TDEA will prefer the retention of its existing employees by transferring them to a new project from a project near its completion or from a position near its termination.

This will only be allowed if their existing job descriptions and responsibilities match the new positions, and if they meet the required set of expertise. The transfers may only be recommended to same grades. All employees shall have equal opportunities for transfer. All transfers are subject to the willingness of the employee and recommendation of the Human Resources Committee.

The HR Unit prepares Staff Transfer Form after consultation with the Human Resources Committee to document reasons and need for the transfer keeping in view factors such as need for retention, staff performance, career development and job requirements. The members of the Human Resource Committee will sign the form. The HR Unit shall develop the schedule of transfer, which will be an integral part of the Staff Transfer Form, in consultation with the relevant supervisor/manager.¹³

7.2.1. Changes in Terms and Conditions of Employment in Transfer Cases

The HR Unit shall seek written consent of the transferring employee on any amendment to the conditions of employment that may be necessitated because of project needs, donor requirements or funding situation. The transferring employee will, however, be required to sign the ToRs of the new position. Any change in salary and/or fringe benefits will require the CEO's approval.

¹² Effective date of implementation: May 26, 2018.

¹³ Repealed on 47th Board of Trustees Meeting held on January 07, 2023: *"The employees may be transferred from one post to another or from one project to another. Transfer shall not be used as a means to shift undesirable or problematic employees to another unit."*

8. PROMOTION¹⁴

8.1. Purpose

TDEA aims to provide career advancement opportunities for employees to develop and utilize their potential whenever possible, while at the same time recognizing their outstanding performance. Promotion is linked with performance appraisals and succession planning that will increase motivation level of employees and eventually improve the retention rate.

It is in the interest of TDEA that employees are encouraged to seek and gain advancement within the organization. While the management reserves the right to appoint the most suitable person to any particular post, whether an internal candidate or an external one, it is TDEA's policy to promote staff from within the organization whenever and wherever possible.

Promotion based on merit provides pathways or potential avenues for the employees to aspire for higher grades, to maintain a clear and stable career development structure enabling advancement and retention of quality staff.

8.2. Policy

Whenever vacancies arise or after each appraisal cycle, the Human Resources Committee shall consider the possibility of promoting existing employees. The Human Resources Committee shall provide its recommendation for the promotion and submit the same to the HR Unit, which will ensure that it is in line with the provisions of Section 8.2.1. After documenting its comments on the recommendation, the HR Unit shall submit it for the consideration and approval of the CEO, who is also authorized to approve changes in the terms and conditions of the employment contract.

8.2.1. Eligibility Criteria

To be eligible for promotion to the next grade, an employee shall have exceeded the expectations in performance appraisals; demonstrated potential for further development; and possessed relevant experience, qualifications and attributes prescribed for the position. Promotion shall be based on merit after giving due consideration to the following factors:

- Job knowledge and technical know-how.
- Competence and potential.
- Performance and quality of work.
- Academic/Professional/Technical qualifications.
- Honesty, integrity and commitment to work.
- Working attitude and interpersonal skills.
- Personal attributes.
- Tenure at TDEA.

¹⁴ Effective date of implementation: May 26, 2018.

9. EMPLOYEE EXIT POLICY¹⁵

9.1. Purpose

This policy sets out the procedures and conditions related to ending the employment with TDEA. It aims to ensure that TDEA is in line with best practices and complies with the statutory requirements. Resignation, termination and expiry of contract are three main categories of the exit policy.

9.2. Resignation

9.2.1. Notice Period

A contract of employment may be terminated by either party (TDEA or employee) by giving notice in writing or payment in lieu, as specified in the employment contract. Unless specified otherwise in the employment contract, the notice period or payment in lieu for termination of employment for all grades shall be one month.

An employee who fails to complete the required notice period shall have his/her final payment deducted proportionately. Any request to waive the whole or part of the notice shall only be entertained if a valid justification has been provided by the employee; and if recommended by the relevant manager for the CEO's approval through the HR Unit.

Similarly, an employee cannot extend his/her notice period to take advantage of the off days or public holidays falling immediately after its expiry. The extended notice shall only be accepted if a valid justification has been provided by the employee; and if approved by the relevant supervisor/manager and the head of the HR Unit.

9.2.2. Leaves During Notice Period

An employee cannot use his/her outstanding compensatory or annual leaves in lieu of the notice period. Similarly, maternity leave cannot be served as notice for termination of employment.

If an employee has applied for annual leave prior to the submission of his/her resignation, the notice period shall start from the date he/she re-joins the office after availing the annual leave.

9.2.3. Submission of Resignation

An employee who wants to end his/her employment with TDEA shall have to submit or email his/her letter of resignation to the HR Unit with a copy to the relevant supervisor/manager, who will endorse the same to signify acknowledgement before forwarding it to the HR Unit.

On receipt of the endorsed resignation, the HR Unit shall acknowledge it in writing and confirm with the employee his/her last working day and the effective date of his/her resignation, as well as convey the same to the relevant supervisor/manager.

9.2.4. Withdrawal of Resignation

The withdrawal of resignation by an employee can only be made in writing and with the approval of the relevant supervisor/manager. A copy of the approved withdrawal letter shall be immediately sent to the HR Unit.

¹⁵ Effective date of implementation: April 17, 2016.

9.3. Termination

9.3.1. Purpose

While the law recognizes an employer's right to terminate the employment of an employee with legitimate reasons, the relevant supervisors/managers must cautiously exercise this right in order to minimize the adverse impact on other employees, their Units and TDEA. Unless the matter is of a serious nature and termination of employment is inevitable, the supervisors/managers are advised to adopt the disciplinary procedures specified in Section 14.

9.3.2. Policy

TDEA may terminate an employee's contract of employment with notice in writing or payment in lieu, as specified in the contract of employment, if his/her performance is not up to the mark; his/her work ethics are poor; he/she is excessively absent from duty; he/she is guilty of gross misconduct, harassment or theft; he/she is guilty of possession, sale or use of illegal drugs; he/she is found to be unsuitable for the job; or under any other circumstances warranting a summary dismissal, other than those specified in Section 9.3.4.

9.3.3. Suspension of Employment

If an employee is suspected of a violation that could lead to summary dismissal, TDEA may, during the investigation, suspend his/her employment for a period not exceeding 14 days. However, if the investigation is of a criminal nature and cannot be completed within 14 days, the suspension may be extended until the conclusion of the criminal proceedings.

During the period of suspension, the employee shall be paid salary as per normal and provided with an opportunity to state his/her case. During the hearing of the case, he/she may be accompanied by a colleague if so desired. In exceptional cases, suspension without salary may be warranted but such a decision can only be made with the approval of the relevant supervisor/manager and the head of the HR Unit.

9.3.4. Prohibition against Termination from Employment

The Employment Ordinance puts the following restrictions on termination from employment:

9.3.4.1. Maternity Protection

After a female employee's pregnancy has been confirmed by a medical certificate and she has served notice of the same, termination of her employment on grounds other than summary dismissal because of serious misconduct is prohibited. The prohibition against termination is applicable from the date on which she served notice of pregnancy to the date on which she is due to return to work.

If a pregnant employee is terminated from employment before she has served notice of pregnancy, she may do so immediately after being informed of her termination. Under these circumstances, the employer must withdraw the notice of termination. Where it has been explicitly agreed that the employment is on probation, termination during pregnancy is not prohibited; however, an employee cannot be terminated because of her pregnancy.

9.3.4.2. Sick Leave Protection

An employer cannot terminate an employee from while he/she is on paid sick leave; however, this restriction does not apply to summary dismissal because of an employee's misconduct.

9.3.4.3. *Annual Leave*

Neither an employer nor an employee can terminate employment by giving the other party notice of termination during the period that is being taken as annual leave; however, this restriction does not apply to annual leave that is in excess of the provisions of the Employment Ordinance.

9.3.4.4. *Giving Evidence or Information to the Labor Department*

An employer cannot terminate an employee for giving evidence or information in any proceedings or inquiry in connection with the enforcement of labor legislation, industrial accidents or breach of work safety regulations.

9.3.4.5. *Injury at Work*

An employer cannot terminate an injured employee before having entered into an agreement with him/her for his/her compensation or before the issuance of an assessment certificate.

9.3.5. **Procedure**

This approach to termination of employment shall only be applied to cases where an employee has committed serious misconduct or failed to improve his/her performance even after repeated warnings. Before any dismissal decision is made, the relevant manager is advised to study all the facts leading to the dismissal and seek advice from the HR Unit with regard to the approach and action to be taken.

If dismissal is deemed necessary, the manager shall complete and forward the Employee Termination Request Form (*attached as Annex No. 19*) with reason(s) to the HR Unit. The manager shall provide substantial evidence in writing to the HR Unit, including record of verbal and written warnings issued to the employee over time.

The HR Unit shall probe the evidence including the written warnings earlier issued as per chapter 14 of the HR Policy Manual and forward the case to the Termination Committee, comprising at least three staff from grade D or above, with its recommendation¹⁶. The Committee may decide *prima facie* or may decide to interview the complainant manager and the employee being considered for termination. All the recommendations for termination shall be submitted to the CEO for approval.

Notwithstanding any provision in Sections 9.3 (Termination) and Section 14 (Disciplinary Process), the Board has vested powers to terminate the services of any employee with the CEO, who may follow any procedure as may be described in the policy or any other process that is transparent, accountable and efficient without compromising the right to a due process of an employee for the time being so long as a thorough revision of the relevant policies is not made and approved by the Board.

9.4. **Return of Company Property on Exit**

On leaving the service with TDEA, the employee shall handover to the relevant manager or designated officer all accounts, contacts, data, records and documents, whether in paper or electronic form, related to his/her job.

On the last working day, the exiting employee shall return all company property to the relevant manager, the Administration Unit and/or the HR Unit, as appropriate. TDEA reserves the right

¹⁶ Amended on 47th Board of Trustees Meeting held on January 07, 2023

to deduct from the resigned employee's final payment an amount equivalent to the value of any property that is not returned or is damaged, as well as any amount that is due to it.

The Employee Exit Form (*attached as Annex No. 18*) shall be signed by all relevant officials to issue clearance to the exiting employee that he/she has returned all TDEA property. The determination of monetary value of any damaged property shall also be included in the form. The assessment shall be made by the Administration Officer and agreed to by the exiting employee. The HR Unit shall forward the form to the Finance Unit for the processing of the employee's outstanding dues.

9.5. Exit Formalities

9.5.1. Exit Interview

The HR Unit may conduct an exit interview with the resigning employee to gain a better understanding of his/her needs and solicit his/her feedback in TDEA's policies and procedures so as to improve the overall working environment and conditions (*Exit Interview Questionnaire attached as Annex No. 17*).

9.5.2. Final Payment

On receipt of the completed Employee Exit Form (*Annex No. 18*), the Finance Unit shall process the exiting employee's final payment including salary, job related payments or reimbursements, payment in lieu of accrued annual leave (if applicable), CPF and any other amount due to the employee (if any) within seven days of his/her effective date of resignation. The payment shall be transferred to the bank account of the exiting employee.

9.5.3. Calculation of Salaries¹⁷

9.5.3.1. Salary Payments in lieu of Termination Notice

The salary payment in lieu of termination notice shall be calculated on the basis of working days using the following formula:

$$\frac{(\text{Last drawn gross salary} * 12)}{260} \times \text{Number of Working Day(s) in lieu of Notice}$$

9.5.3.2. Final Salary Payment

The final salary payment shall be calculated on the basis of working days using the following formula:

$$\frac{(\text{Last drawn gross salary} * 12)}{260} \times \text{Number of Day(s) Worked}$$

9.5.3.3. Salary Payment in lieu of Accrued Annual Leave

The salary payment in lieu of accrued annual leave or salary deduction for advanced annual leave shall be calculated on the basis of working days using the following formula:

$$\frac{(\text{Last drawn gross salary} * 12)}{260} \times \text{Number of Annual Leaves}$$

¹⁷ Effective date of implementation: March 18, 2017.

9.5.4. Experience/Reference Letter

The HR Unit shall issue experience/reference letter and facilitate the provision of tax deduction certificate to an existing employee at the time of clearance of his/her final dues.

10. SALARY AND FRINGE BENEFITS POLICY

10.1. Purpose

TDEA aims to provide employment that offers fair and equitable remuneration in relation to responsibility and performance. The salary policy is designed to attract, motivate and retain a high-caliber workforce. This policy sets out the guidelines for salary administration at TDEA. It should be noted that while the HR Unit formulates the salary policy and oversees the salary administration, it is primarily the responsibility of directors/managers to execute the policy in accordance with the laid down principles.

10.2. Principles

TDEA's salary policy shall be governed by the following principles:

10.2.1. External Competitiveness

The organization shall pay salaries that are competitive in the market for similar jobs. Consideration shall be given to pay levels, pay trends, and supply and demand in the market.

10.2.2. Internal Equity

All jobs are categorized into grades with reference to their job requirements and associated responsibilities. The same salary range shall apply to the employees in the same job grade.

10.2.3. Individual Profile

The salary shall be commensurate with an employee's qualifications and experience.

10.2.4. Performance

The results achieved and personal efforts shall be primary factors in determining the salary progression of an employee.

10.2.5. Cost Efficiency

TDEA shall achieve these principles at a reasonable cost and within available budget.

10.2.6. Minimum Wage

TDEA shall not pay an employee a salary that is below the minimum wage determined by the Government of Pakistan.

10.3. Salary for New Recruits

The Board has approved the salary ranges for new recruits (*see table on the following page*) and any negotiation shall be confined within these. The salary ranges may be reviewed after every three years keeping in view the cumulative inflation and market competition.

Max limit of years with in band ranges															
Grade	Position	Minimum	Maximum	Maximum after 10 year	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
					0	1	2	3	4	5	6	7	8	9	10
A	Chief Executive Officer	706,188	1,900,000	1,831,670	706,188	776,807	854,488	939,936	1,033,930	1,137,323	1,251,055	1,376,161	1,513,777	1,665,155	1,831,670
B	Director	564,950	1,350,000	1,465,336	564,950	621,446	683,590	751,949	827,144	909,858	1,000,844	1,100,929	1,211,022	1,332,124	1,465,336
C	Deputy Director	451,960	1,200,000	1,172,269	451,960	497,156	546,872	601,559	661,715	727,887	800,675	880,743	968,817	1,065,699	1,172,269
D	Team Lead	361,568	950,000	937,815	361,568	397,725	437,498	481,247	529,372	582,309	640,540	704,594	775,054	852,559	937,815
E	Deputy Team Lead	258,263	670,000	669,868	258,263	284,089	312,498	343,748	378,123	415,935	457,529	503,282	553,610	608,971	669,868
F	Thematic Lead	184,474	490,000	478,477	184,474	202,921	223,213	245,534	270,088	297,097	326,806	359,487	395,436	434,979	478,477
G	Deputy Thematic Lead	131,767	350,000	341,769	131,767	144,944	159,438	175,382	192,920	212,212	233,433	256,776	282,454	310,699	341,769
H	Senior Officer	94,119	250,000	244,121	94,119	103,531	113,884	125,273	137,800	151,580	166,738	183,412	201,753	221,928	244,121
I	Officer	67,228	180,000	174,372	67,228	73,951	81,346	89,480	98,429	108,271	119,099	131,008	144,109	158,520	174,372
J	Junior Officer	48,020	130,000	124,552	48,020	52,822	58,104	63,915	70,306	77,337	85,070	93,577	102,935	113,229	124,552
K	Assistant	34,300	90,000	88,965	34,300	37,730	41,503	45,653	50,219	55,240	60,765	66,841	73,525	80,878	88,965
L	Skilled Support Staff	24,500	65,000	63,547	24,500	26,950	29,645	32,610	35,870	39,457	43,403	47,744	52,518	57,770	63,547
M	Non-Skilled Staff	17,500	47,000	45,390	17,500	19,250	21,175	23,293	25,622	28,184	31,002	34,103	37,513	41,264	45,390

10.4. Salary on Transfer and Redeployment

An employee's salary on transfer shall be decided as per the terms and conditions mentioned in Section 7. Considering the increased workload, a special project allowance may be given to him/her on the recommendation of the relevant supervisor/manager with the CEO's approval. Similarly, an employee's salary on redeployment shall be decided considering his/her workload on the recommendation of the relevant supervisor/manager with the CEO's approval.

10.5. Salary on Promotion

In case of an employee's promotion to a higher grade, a promotional increase equitable to other employees in the new grade or a salary progression scheme shall be recommended by the relevant supervisor/manager and HR for the CEO's approval.

10.6. Remuneration for Temporary Appointments, Interns/Part Time Staff and Consultants

The remuneration to be offered for temporary appointments (interns/part time staff/consultants) does not fit into the salary structure defined in Section 10.3; therefore, it shall be determined considering the following factors:

- Prevailing market rate.
- Nature of work and assessment of workload.
- Academic, professional and technical qualifications.
- Relevant work experience.
- Recent earnings/Last drawn salary.
- Budget availability.
- Availability of suitable candidates in the market.

The remuneration package shall be recommended by the relevant supervisor/manager and approved by the CEO after endorsement by the Finance and HR Units.

10.7. Annual Salary Increments^{18 19}

TDEA will have two performance appraisal cycles during the year, on June 30, and December 31. Based on performance appraisals, annual salary increments may be given to the employees who have completed one year of employment including their probation period on June 30 or December 31. Annual performance based Increments are defined in performance appraisal policy.

10.8. Confidentiality of Salary Information

Salary information of all employees is strictly confidential. Only the individual employee, the relevant supervisor/manager or the designated officer, and the employees who manage salary and benefit administration shall have access to an employee's salary information. However, the salary information of all staff in Grade B and above shall be posted on TDEA's websites along with their annual income and wealth tax returns as part of institutional transparency. Other staff may also choose to be part of this initiative.

10.9. Fringe Benefits

The provision of fringe benefit shall be defined in the employment contract. Subject to availability of resources, TDEA offers the following fringe benefits to eligible employees after the completion of their probation:

¹⁸ Repealed Clause: Based on their performance appraisals, annual salary increments may be given to the employees who have completed one year of employment including probation on June 30 or December 31 of a fiscal year. TDEA shall have two performance appraisal cycles during the year. Annual performance based Increments shall not exceed more than 8 percent of the Gross salary of any employee and shall be approved by the CEO.¹⁸

Repealed Clause: Annual salary increments are applicable only for 'Permanent' and 'Contract' employees who either have contracts of more than one year or continue their employment on expiry of yearly contract without break and without any significant change in responsibilities. The salaries of other staff shall be reviewed/re-negotiated at the time of renewal of contract based on their performance appraisal. The eligibility criteria for annual salary increment based on performance appraisal are as follows:

- Eligibility Criteria 1: Tenure with TDEA is of six months at the end of a fiscal year.
- Eligibility Criteria 2: No promotion in the current year.
- Eligibility Criteria 3: No substantive salary raise in the last fiscal year.
- Eligibility Criteria 4: Employment is long-term.

Effective date of implementation: July 1, 2014.

¹⁹ Repealed Clause (November 17, 2017): Based on performance appraisals, annual salary increments may be given to the employees of TDEA and its projects who have completed one year of employment on June 30. Annual Increments shall not exceed more than 10 percent of the basic salary of any employee and shall be approved by the CEO. The employees who join in the mid of fiscal year shall not be eligible for annual salary increment.

10.9.1. Contributory Provident Fund²⁰

TDEA provides the CPF Scheme to its contractual employees, in line with the Rules of the Provident Fund Deed. TDEA and an employee shall make equal contribution to the CPF at the end of each month. The contribution from each party shall be equivalent to 4.17% of Gross monthly salary (both contributions shall add up to one Gross salary per year).

The contribution of employees shall be deducted from monthly salaries with their consent (*Employees' Contributory Provident Fund Rules attached as Annex No. 22*). The Management shall form a Provident Fund Committee to manage the CPF. The composition, tenure and functions of the Committee have been defined in the Provident Fund Deed and Rules.

10.9.2. Long-Term Disability Benefits

TDEA shall ensure that long-term disability benefits are available to its contractual employees as part of their life and accidental insurance plan. However, such arrangement shall be made when funds are available.

10.9.4. Health Insurance

TDEA shall provide health insurance to contractual employees from the very first day of their joining. TDEA insurance policy also covers the dependents of employees, including spouse, children and children (legally adopted) to be referred to as eligible family members in the document.

10.9.4.1. Hospitalization (In-Patient Department)

Hospitalization insurance up to a certain prescribed limit, as defined in the Insurance Policy, is provided to all employees who are eligible for benefits and as described in their employment contract. Its terms and conditions are available with the HR Unit in the form of Insurance Policy provided by the insurance company for the fiscal year. The insurance policy may vary from time to time and the HR Unit shall notify all employees if any change in policy occurs.

In case an employee wants to avail medical facility from a non-panel hospital and prior payment by him/her may result in hardship or delay of essential treatment, TDEA may make payment directly to an approved medical center, registered medical practitioner or other competent authority. The employee shall provide the appropriate documentation along with the Medical Treatment Payment Form (*attached as Annex No. 23*), setting out the need for treatment and the estimated cost.

An employee who wants to avail this facility shall complete the Medical Treatment Payment Form (available with the HR Unit) and submit it to the HR Unit after the CEO's approval. The Finance Unit shall issue a cross cheque in favor of the concerned medical center or hospital. An employee found to be misusing the facility shall be subject to disciplinary action.

²⁰ Effective date of implementation: March 18, 2017.

Repealed Policy 10.10.3. Gratuity Fund

TDEA shall establish a Gratuity Fund for the benefit of its contractual employees to be named 'Trust for Democratic Education and Accountability Gratuity Fund'. The Gratuity Fund shall be managed in line with the Gratuity Fund Deed and Rules. All contractual employees having completed a continued service of a minimum of six months shall be entitled for the Gratuity Fund.

10.9.4.2. Out Patient Department Facility²¹

For Out Patient Department (OPD) facility, the eligibility of an employee is the same as mentioned in Section 10.10.4.1. The out-patient medical treatment expenses incurred during that calendar year shall be included. The annual ceiling of outpatient expenses of an employee or his/her family shall be approved by the CEO on an annual basis. Any OPD allowance consumption over the defined limit shall be deducted from the employee's salary.²²

Any employee who joins TDEA during the year will be provided a pro-rated outpatient expense allowance up to his/her contract tenure or insurance policy tenure, whichever expires earlier. Similarly, any employee who leaves the organization after receiving the full outpatient expense allowance will be responsible to reimburse the over-utilized benefit.

The outpatient expenses of employees or their families that exceed the limit approved by the CEO for that calendar year shall not be a liability of TDEA and shall be deducted from the employee's salary.

10.9.4.3. Medical Claim Processing

The HR Unit shall be the processing unit for all medical claims regardless of the nature of claim, whether In-Patient Department (Non-Panel) or OPD. It is up to an employee for which ever option of hospital (panel or non-panel) he/she goes for.

For claims of non-panel hospital, an employee shall submit all medical bills, lab investigations, discharge slip, doctor's prescriptions and reports or any other relevant document needed for processing of claim to the HR focal person so that complete documentation could be sent to the insurance company.

An employee shall have to submit all claims at his/her earliest convenience to the HR Unit to avoid any objection from the insurance company. Any medical claim submitted after the end of policy for that calendar year shall not be a liability of TDEA.

10.9.5. Life Insurance

As a policy, TDEA supports insurance coverage for the contractual employees under a Group Insurance Scheme. Subject to the availability of adequate funds, the insurance coverage shall be provided in consultation with the staff and with the approval of the Board.

10.9.6. Bonus

Subject to the availability of funds, all employees from Grade M and L shall be given one bonus, not more than one month of their last drawn gross salary. The Board may also allow bonus to other TDEA staff on the recommendation of the Chairperson, but such bonus shall only be subject to the availability of funds.

10.9.7. Advance Salary

Advance against salary shall only be made under exceptional circumstances. A confirmed staff member can request for a maximum of one months' salary in advance by completing the Advance Request Form (*attached as Annex No. 24*). All such requests shall be approved by

²¹ Repealed Clause (November 17, 2017): The OPD allowance for all eligible employees shall be announced every year by the HR Unit.

²² Added Clause in Twenty-Sixth Meeting of the Board of Trustees: Resolution No. bot26-11/17-01
Effective date of implementation: November 17, 2017.

the CEO and submitted to the Finance Unit. The advance shall be recovered in two equal installments, starting from the next month in which advance is issued.²³

Repealed Policy (December 22, 2019): 10.10.8. **Gratuity Fund Loan Scheme**

Repealed Clause (December 22, 2019): All employees in Grade 1 to 1.75 shall be given at least one bonus equivalent to their basic salary, subject to the availability of funds. Such bonus may be given to the employees before religious festivals.

²³ Added Clause in Twenty-Seventh Meeting of the Board of Trustees: Resolution No. bot27-02/18-01
Effective date of implementation: February 24, 2018.

Repealed Clause (February 24, 2018): Salary advances shall only be made under exceptional circumstances. A confirmed staff member can request for a maximum of two months' salary in advance, by making a written request on the prescribed Salary Advance Form (*attached as Annex No. 24*) along with two guarantees of office colleagues of at least a grade higher and/or members of Loan Approval Committee. All such requests shall be approved by the CEO and submitted to the Finance Unit. All loans shall be recovered in equal instalments or within the contractual year of the employee, whichever is applicable.

11. HOURS OF WORK

11.1. Working Hours²⁴

The regular working hours for TDEA shall fall between 8:30 a.m. and 7:30 p.m. However, employees will decide their daily working schedule in consultation with their respective supervisors²⁵. As per Pakistan's law and donor requirements, all staff is required to work for eight hours in a regular day excluding breaks. Any shortfall in daily working hours shall be deducted from their salary on a monthly basis. If an employee works for less than four hours on any working day, he/she must apply for a half day leave, however, late arrivals/short hours will not be adjusted against half-day leave, except for emergency. Employees are requested to seek prior approval from their supervisors.

TDEA Project Offices can schedule their working hours as per the agreed terms and conditions with respective donors. However, the maximum working hours shall not exceed 40 hours and shall not be less than 35 hours. All employees are required to register their arrival and departure time on the attendance register and/or Biometrics machine. They are also required to submit a time sheet at the end of the month to the HR Unit for processing of salaries.

11.2. Unit Timings²⁶

The employees who are required to work in the evening owing to the nature of their duties may request HR Unit a change in the Unit and/or any staff timing in advance. The CEO shall approve all such changes on the recommendation of the relevant Director.

11.3. Overtime Work

The employees may be required to work additional hours when operational or contingency needs arise. The policy and procedure governing overtime compensation have been detailed in Section 12.

11.4. On-call Duties

In exceptional cases, there may be a need for the employees to be on-call outside normal working hours to handle operational or contingency matters. If the matters cannot be dealt with over the telephone, TDEA may require the employees to return to the workplace for emergency assignments. Extra hours worked may be compensated in accordance with the policy and procedure governing overtime compensation as detailed in Section 12

11.5. Late Arrivals²⁷

It is the responsibility of the supervisor/manager to manage staff time and discipline. The supervisor/manager shall communicate the late comings to the HR Unit. Habitual late arrivals

²⁴ Effective date of implementation: April 17, 2016.

²⁵ Amended on 47th Board of Trustees Meeting held on January 07, 2023 (effective from December 01, 2022)

²⁶ Effective date of implementation: April 17, 2016.

²⁷ Repealed Clause: (December 22, 2019): If there are more than five late arrivals in a month, one day basic salary shall be deducted for every additional late arrival.

will be dealt under the provisions of the disciplinary process. Late arrivals will be marked after 11:00 a.m.

11.6. Work from Home/Telecommuting Policy²⁸

For justifiable and compelling administrative reasons to be notified to the HR in advance, team leads may assign work from home to the staff members. However, any such arrangement involving working over the weekend or exceeding a week shall be approved by the CEO. ²⁹³⁰

²⁸ Repealed Clause (November 17, 2017): Telecommuting is the practice of working at home or at a site near home on an agreed-upon, scheduled basis instead of physically traveling to a central workplace. It is a work alternative that TDEA may offer to some employees when an employee has valid reasons to work from home in certain cases and it would benefit both TDEA and the employee. Telecommuting is an alternative method of meeting the needs of the organization and is not a common employee benefit. An employee employed for working from home is bind to follow TDEA's Compendium of Policies and Procedures except the waivers provided under this policy for the purpose of regulating working from home mechanism.

Telecommuting or working at home is sometimes allowable and doable within certain job functions. Therefore, working from home should never be taken lightly or be a spur of the moment decision. The decision to work from home must be made with (and approved by) an immediate supervisor. TDEA has the right to refuse to make telecommuting available to an employee and may terminate a telecommuting arrangement at any time for any reason.

Either an employee or a supervisor can suggest telecommuting as a possible work arrangement. The employees who believe telecommuting can enhance their ability to get the job done should complete self-nomination and eligibility forms and make their case to their direct supervisor. Occasional work-at-home arrangements are considered informal arrangements and are approved at the discretion of the CEO on recommendation of the supervisor. Forms can be obtained from the HR Unit. The decision to approve a telecommuting arrangement shall be based on factors such as the following:

- Nature of position and job duties.
- Performance history.
- Related work skills.
- Impact of proposed telework arrangement on the organization.
- Appropriateness of telework site.

Both the employee's supervisor and the HR Unit shall make the recommendation and the CEO shall approve the work from home. The arrangement shall be reviewed periodically. The employee shall establish an appropriate work environment within his or her home for work purposes. TDEA shall not be responsible for costs associated with initial setup of the employee's home office such as remodeling, furniture or lighting, nor for repairs or modifications to the home office space. The employees shall be offered appropriate assistance in setting up a workstation suitable for safe, data-secure and comfortable work.

The employee's compensation, benefits, work status, work responsibilities and the amount of time he/she is expected to work per day or per pay period shall not change due to participating in the telecommuting program (unless otherwise agreed to in writing). An employee's at-home work hours shall conform to a schedule agreed on by the employee and his/her supervisor. Changes to this schedule must be reviewed and approved in advance by the employee's supervisor.

Exempt employees shall be compensated on a salaried basis for all time worked while telecommuting. Non-exempt employees are required to record all hours worked while telecommuting. Overtime (work in excess of 40 hours per week) is not to be worked unless the employee receives prior written authorization to work overtime from his/her supervisor. The employees who fail to obtain written proper authorization before working overtime shall be subject to corrective action, including termination.

²⁹ Amended on 47th Meeting of BOT on January 07, 2023 (effective from December 01, 2022)

³⁰ Added Clause in Twenty-Sixth Meeting of the Board of Trustees: Resolution No: bot26-11/17-01
Effective Date of implementation: November 17, 2017.

12. JOB RELATED PAYMENTS AND REIMBURSEMENTS

12.1. Purpose

This section sets out the compensation to eligible employees for hours worked in excess of normal working hours as specified by management in the form of compensation time, or job related payments and reimbursements when granting of compensatory time is not feasible.

12.2. Policy

It is the Management's responsibility to ensure that overtime work is only performed when necessary and unavoidable. Regular or perpetual overtime is discouraged and considered inappropriate. The Management should review the circumstances leading to regular overtime and should look for other means to improve the situation. Consideration should be given to 'shift' or staggered working hours. Overtime work should be compensated by compensation time whenever situation permits.

12.3. Compensatory Time³¹

The employees may apply for compensatory time for work over the weekend with approval of their Team Lead. They shall be eligible to take as many hours of compensation as they have worked extra but not more than eight hours. The employees who worked on any weekend / holiday will be required to mark their attendance. The compensatory time will be added to employee's Compensatory Time after the approval of the 'Work on Weekend Request' from the relevant Team Lead. In addition to events planned over the weekend, compensatory time will only be availed for urgent additional assignment³². All such forms shall be approved by the relevant manager and director; and they shall specify the need for working extra. Late submissions of Compensatory Time Claim Forms shall not be entertained. The compensatory time balance expires at the end of the fiscal year. If an employee is sitting late on a working day due to any urgent meeting or special assignment, he/she can avail relaxation in arrival time next day with the approval of his/her supervisor.

Except for emergency situations, and approved by the relevant director after ascertainment and recommendation of HR Unit, employees are required to submit their request for compensatory leave with HR, prior to availing the leave. HR will communicate to employees about the approval status of their applications.³³

12.4. Overtime Payment

Eligible employees in Grade M and L may be compensated by overtime payment whenever compensation time cannot be granted. They may apply for overtime payment provided that they work for at least one hour beyond the normal working hours.

However, the relevant supervisors shall seek prior approval of payment of overtime for employees in Grade M and L. Any ex-post-facto claim shall not be approved. Subject to the availability of funds, compensation for overtime work will be paid equivalent to the approved

³¹ Effective date of implementation: April 17, 2016.

³² Amended on 47th Board Meeting on January 07, 2023 (effective from December 01, 2022)

³³ Added in 31st Meeting of Board of Trustees: May 5, 2019

over time. The payment will not be more than double per hour rate of the gross monthly salary.³⁴

12.5. Meal and Drop Facility³⁵

The supervisors of all staff members who are required to stay late due to some special assignment/urgent work shall inform the Administration Unit in writing; in case any support, drop facility or meal arrangement is required.

The employees who are required to work on off days or beyond normal working hours shall be entitled to a reasonable meal, with the approval of the supervisor. The employees who do not own a vehicle and are required to work beyond the normal working hours/off days on some special assignment/urgent work shall be entitled to either taxi fare to their home or home drop by the official vehicle, with the approval of the supervisors/managers.

³⁴ Effective date December 22, 2019

³⁵ Effective date of implementation: April 17, 2016.

13. LEAVE³⁶

13.1. Policy

The objective of providing leave benefits to TDEA employees is to release pressure of work and provide them time-off under circumstances such as sickness, marriage and pregnancy. The leave benefits set out in this section are applicable to the employees eligible for leave entitlement as defined in their employment contract.

The application for leave is subject to the approval of TDEA and must be supported by relevant documents proving the eligibility of the employee to the satisfaction of the organization. The details of the leave policy have been set out in the following paragraphs. The policy shall be subject to change from time to time at the discretion of the Board. HR will communicate to employees about the approval status of their applications.

13.2. Public Holidays³⁷

The employees are granted paid public holidays as gazetted by the Government of Pakistan. The gazetted holidays are inclusive of statutory holidays. The employees working on gazetted holidays are eligible to claim compensatory time with the supervisor's recommendation in accordance with compensatory time claim policy.³⁸

TDEA may announce a workday on a weekend or public holiday during times of work pressure such as General Elections or any other incident as seen fit by the Senior Management. However, all such days shall be compensated as leaves or as addition to compensatory time. Similarly, TDEA may announce a holiday off in light of organizational requirements, on account of a special event such as New Year.

13.3. Annual Earned Leave

13.3.1. Entitlement

The employees entitled for annual leaves, as defined in employment contract, shall earn 15 days annual leave, calculated on pro-rata basis.³⁹ However, the employees having at least a one year contract may avail annual leaves in advance subject to the CEO's approval.

If such an employee resigns or is terminated before the completion of his/her contract, he/she is required to compensate TDEA for any advance leave taken in excess of his/her pro-rata entitlement. Salary deduction in lieu of advanced annual leave is calculated based on working days in accordance with the following formula:

³⁶ Effective date of implementation: April 17, 2016.

³⁷ Updated: June 9, 2016.

³⁸ Effective date of implementation: March 18, 2017.

³⁹ Effective date of implementation: July 1, 2017.

Repealed Clause (June 30, 2017): The employees entitled for annual leaves, as defined in employment contract, shall earn 22 days annual leave, calculated on pro-rata basis.

$$\frac{(\text{Last drawn gross salary including COLA}) * 12}{260} \times \text{Number of Annual Leaves}^{40}$$

The employees, after submitting their resignation letters, are not allowed to use their outstanding annual leave in lieu of termination notice. However, under special circumstances, annual leave in lieu of notice period can be taken with the approval of the relevant managers and the head of the HR Unit. An employee shall not be allowed to serve his/her resignation notice during his/her annual leave. All earned annual leaves shall be approved in advance by the supervisor/manager and the CEO⁴¹. However, the employees may take their annual leave(s) without prior approval in case of a family emergency such as death, accident or illness of immediate family member/ blood relation.

13.3.2. Leave Requests

Employees may take their earned annual leave with the recommendation of supervisor/Unit Head and the approval of CEO.⁴² Approved annual leave form should be submitted to HR Unit in as much advance as possible. Annual leaves can be refused due to work-related reasons.

13.3.3. Accumulation and Encashment of Earned Annual Leave(s)⁴³

An employee who has completed 12 months of continuous service with TDEA shall be eligible for accumulation and encashment of earned annual leave(s). An employee who has completed 12 months of continuous service with TDEA and failed to utilize earned annual leaves, his/her annual leaves quota shall be added to the succeeding year.

However, the maximum number of earned annual leaves, which may be carried forward to the succeeding year, shall not exceed 14 days. If an employee, who has completed 12 months of continuous service with TDEA, resigned or discharged before availing the earned annual leaves, or if, having applied for and having been refused the earned annual leaves, TDEA shall pay him/her leave encashment for up to 28 days on gross salary basis. Notwithstanding the above, employees should be encouraged to avail their annual leave(s) as far as possible during the year.

13.4. Casual Leaves⁴⁴

Employees eligible for casual leave entitlement as defined in employment contract can avail 10 casual leaves during the year annualized on pro-rata basis. However, following rules shall apply on the use of casual leaves:

⁴⁰ Effective date of implementation: March 18, 2017.

⁴¹ Updated: June 24, 2016.

⁴² Effective date of implementation: March 18, 2017.

⁴³ Effective date of implementation: July 1, 2016.

⁴⁴ Repealed Clause (November 17, 2017): The employees eligible for casual leave entitlement as defined in employment contract can avail 10 casual leaves during the year calculated on pro-rata basis. However, the following rules shall apply on the use of casual leaves:

1. More than three casual leaves at a time shall not be granted.
2. A maximum of three casual leaves can be availed in a month. An extra leave shall be marked as absent and equivalent salary shall be deducted.

1. A maximum of three casual leaves can be availed in a month.
2. Employees are responsible to communicate to the HR and their manager/supervisor in case they are taking a casual leave. Application for casual leaves MUST be submitted to HR Unit as soon as employees join the office. No late submission will be accepted. The Leave Application Form duly accepted by the HR, may be approved by the supervisor.
3. Casual Leaves⁴⁵ on Friday and/or Monday can only be availed in emergency situations. Specific reason (s) for casual leave availed on Friday/Monday may be given on the Leave Request Form. It has to be approved by the relevant Director on the ascertainment and recommendation by HR Unit. In case, HR Unit is not satisfied, deduction will be made from the earned leaves balance of the employees. If the employee has already exhausted his/her earned leaves, his/her compensatory time balance will be adjusted. In case the employee has exhausted leave balances of both earned and compensatory leaves, h/she will be marked absent and a day's gross salary will be deducted.

13.5. Sick Leave⁴⁶

In case of sickness, a maximum of 15 working days fully paid sick leave is allowed in a year to eligible employees as defined in employment contract. In case of prolonged sickness, any extension to this quota of sick leave may be allowed by the CEO, which may not exceed 15 additional days' sick leave with full gross salary. The leave application must be approved by supervisor/manager and reason for sick leave must be mentioned.

3. Employees are responsible to communicate to the HR Unit and their supervisor/manager in case they are taking a casual leave. Leave Application Form duly approved by the supervisor/manager shall be submitted to the HR Unit before the 25th of every month, failing which an absent shall be marked and equivalent salary will be deducted.
4. Sandwich leave rule will apply. Three or four earned leaves will be deducted if an employee avails a casual leave on Friday and/or the following Monday.

⁴⁵ Added Clause in Twenty-Sixth Meeting of the Board of Trustees: Resolution No. bot 26-11/17-01
Effective Date of implementation: November 17, 2017. Then Repealed Clause in 31st Meeting of Board of Trustees: May 3, 2019

Unless due to compelling circumstances, duly approved by the relevant director, an employee shall not be allowed casual leave on Friday and Monday

Added Clause in 31st Meeting of Board of Trustees:

⁴⁶ Repealed Clause (November 17, 2017): In case of sickness, a maximum of 15 working days fully paid sick leave is allowed in a year to eligible employees as defined in employment contract. In case of prolonged sickness, any extension to this quota of sick leave may be allowed by the Chief Executive Officer, which may not exceed 15 additional days' sick leave with full gross salary.

The leave form must be approved by supervisor/Manager and reason for sick leave must be mentioned. Doctor's certificate is required along with the leave form for any sick leave.⁴⁶ Failure to submit both the verification of illness and leave application will result in the employee's absence being treated as "leave without pay".

In case the sickness continues, the CEO may also allow a maximum of three-month leave with full basic salary, subject to availability of resources. TDEA may continue the employment of the concerned staff if the illness continues beyond three months without any salary.

However, TDEA shall continue the payment of premium towards medical insurance of the concerned employee, if applicable, for a maximum of one year. TDEA may extend possible assistance in terms of long term disability benefits, if applicable, subject to the availability of resources.

For availing sick leaves for up to 3 days, doctor's prescription or medicine slip shall be required that shall suffice as verification of illness, along with leave form. Doctor's certificate/Discharge slip/Hospitalization proof shall be required along with the leave form for any sick leave exceeding three working days. Failure to submit both the verification of illness and leave application shall result in the employee's absence being treated as 'leave without pay'.

Subject to the CEO's approval, for special circumstances including existing medical conditions, a one-time certification by a registered medical practitioner to be renewed every year shall be sufficient to avail medical leaves along with the leave form. In case the sickness continues, the CEO may also allow a maximum of three-month leave with half gross salary, subject to availability of resources.

TDEA may continue the employment of the concerned staff if the illness continues beyond three months without any salary. However, the organization shall continue the payment of premium towards medical insurance of the concerned employee, if applicable, for a maximum of one year. TDEA may extend possible assistance in terms of long term disability benefits, if applicable, subject to the availability of resources.

13.6. Education/Examination Leave

Eligible employees can avail their annual earned leaves with prior approval from unit head for either preparation or appearing in an examination on submission of adequate evidence (date sheet or examination notification) as required by the HR Unit. The leave shall be approved by the supervisor/manager and relevant unit head in advance.

13.7. Maternity Leave

13.7.1. Eligibility

Paid maternity leave shall be granted to female employees who:

1. Have worked with TDEA for at least four months and have one year contract with the organization.⁴⁷
2. Have properly given notice of pregnancy to their supervisor/managers.
3. Have produced a medical certificate issued by a registered medical practitioner specifying the expected date of delivery.
4. Have expressed the intention to continue their job with TDEA after the maternity leave. Staff members not intending to return are entitled to six weeks maternity leave with full gross salary.

13.7.2. Entitlement

Paid maternity leave should be for a maximum of three months:

1. With the agreement of her supervisor/manager, a female pregnant employee may decide to commence her maternity leave from two to four weeks before the expected date of delivery. The employee should, as soon as possible, reach a mutual agreement with her supervisor/manager on the commencement date of her leave so that appropriate work arrangement during her absence could be made in advance;

⁴⁷ Effective date of implementation: March 18, 2017.

2. If the employee does not decide on the date, or the date is not agreed between the employee and her supervisor/manager, the employee shall commence her maternity leave four weeks before the expected date of delivery;
3. Apart from the three months paid leave, if delivery of children is delayed beyond the expected time, the employee may apply annual leave or unpaid leave for a further period equal to the number of days from the day after the expected date of delivery to the actual date of delivery. In addition, the employee may apply unpaid leave for a further period of not more than four weeks on grounds of illness or disability due to the pregnancy or confinement.
4. In case of miscarriage after twenty eight weeks of pregnancy, the female employee shall be eligible for maternity leave for three months as well.⁴⁸

13.7.3. Procedure

Application for maternity leave must be submitted as soon as the expected date of delivery is known but not later than 12 weeks prior to the expected date of delivery. The employee must produce a medical certificate issued by a registered medical practitioner, specifying the expected date of delivery. A copy of the birth certificate of the children must be submitted to the HR Unit on resumption of duty for enrolment of employee benefits.

13.7.4. Breastfeeding Breaks

Breastfeeding mothers are entitled to two half-hour breastfeeding breaks daily until the baby becomes one year old and the breastfeeding break shall be curtailed to half an hour break until the baby becomes two years old. If an employee is availing the day-care facility, she shall be eligible for breastfeeding breaks within the office premises.⁴⁹

13.7.5. Childcare

TDEA shall provide an adequately equipped Childcare facility. The facility shall be availed as per the guidelines developed by and available with the HR Unit.

13.7.6. Prohibition of Harmful Work

TDEA shall ensure that a pregnant employee shall not be exposed to any work that is injurious to pregnancy.

13.8. Paternity Leave

A male employee who is the expectant father or father of a new born child shall be granted a maximum of five working days' paid paternity leave subject to the following criteria:

- The male employee has worked with TDEA for at least four months.⁵⁰
- Application for paternity leave must be supported by documents proving the eligibility of the employee to the satisfaction of TDEA and must be approved by supervisor/manager. The supporting documents include a medical certificate issued by a registered medical practitioner specifying the expected date of birth of the child, a medical certificate issued by a registered medical practitioner specifying the date

⁴⁸ Effective date of implementation: March 18, 2017.

⁴⁹ Effective date of implementation: March 18, 2017.

⁵⁰ Effective date of implementation: March 18, 2017.

of birth of the child if so required by TDEA and a copy of the birth certificate of the child showing that the employee is the father of the child.

- The period within which paternity leave must be taken is one month before the expected date of birth of the child up to one month immediately following the birth of the child. Leave can be taken in one single block or in blocks of day or days during the eligible period.
- In case of miscarriage after twenty eight weeks of pregnancy, male employee shall be eligible for paternity leave for five days.⁵¹

For the avoidance of doubt, an employee who has submitted notice of resignation is not eligible to apply for paternity leave. If an employee's application for paternity leave has been approved prior to his submission of notice of resignation and the approved leave falls within his notice period, the approved leave shall be subject to cancellation.

13.9. Unpaid Leave

Employees are not encouraged to apply for unpaid leave(s) unless they have valid reasons. In addition, unpaid leave(s) shall only be granted if there are sufficient human resources in their Unit/Department during their absence and approval is obtained from their supervisors/managers.

However, if unpaid leave(s) exceed(s) 14 consecutive days, including rest days and public holidays; further approval from CEO is required. Unpaid leave taken shall result in a salary deduction, calculated on the basis of working days, in accordance with the following formula:

$$\frac{(\text{Last drawn gross salary}) * 12}{260} \times \text{Number of Workdays}^{52}$$

13.10. Leave Balance on Transfer between Projects

Any employee who is transferred from one project to another shall have all his/her leaves continued on the basis of his/her confirmed employment with TDEA.

13.11. Adjustment of Leave(s)

In case of any system error or updating issues, because of which leave has been charged in wrong category by the employee, The HR Unit is authorized to adjust the leaves of the employees from any available balance without any change in timesheets.

⁵¹ Effective date of implementation: March 18, 2017.

⁵² Effective date of implementation: March 18, 2017.

14. DISCIPLINARY PROCESS

All TDEA employees are required to observe high standards of performance, discipline, norms and customs of service, and behavior appropriate to their employment. All staff members shall observe and abide all lawful orders and directions issued by the respective supervisors. They shall never violate the fundamental principles of good human conduct and the dignity of beneficiaries.

At all times, information, publicity and advertising activities shall recognize TDEA beneficiaries as dignified human beings, not hopeless objects deserving alms. Any breach of the expected code of conduct shall result in a written warning to the employee by the relevant manager or the HR Unit.

The table on the next page details the acts of misconduct and penalties. All referrals by the HR Unit and terminations shall, however, be approved by the Internal Disciplinary Committee (IDC) within five days. The IDC shall comprise the following:

1. Staff member/s to be nominated by CEO
2. One female staff member to be part of IDC.
3. One representative of the HR Unit for facilitation.⁵³

The IDC shall meet every month and review the disciplinary report furnished by the HR Unit. The report shall comprise details of all warnings issued and list of all warnings that need to be decided by the IDC.

⁵³ Amended on 47th Meeting of Board of Trustees held on January 07, 2023

Sr.#	Act of Misconduct	Issuing Authority	Evidence	First Instance	Second Instance	Third Instance	Fourth Instance
Category 1							
1	Habitual Tardiness	HR Unit	Attendance Record, Working Hours, Leave Records	Verbal Warning	Written Warning	Written Warning	Termination
2	Not completing required working hours	HR Unit	Attendance Record, Working Hours, Leave Records	Deduction of Gross Salary of Short Hours calculated on monthly basis			
3	Repeatedly leaving job or work area during the office timings without informing or taking authorization from concerned official or taking short leave	HR Unit	Working Hours, Leave Records	Verbal Warning	Written Warning	Written Warning	Termination
4	Habitual absence without leave or absence from duty without approved leave for more than 5 days	HR Unit	Working Hours, Leave Records	Written warning	Termination		
5	Misuse of staff members and/or office resources including utilizing to carry out personal work without official consent	HR Unit	Eyewitness'	Written Warning	Deduction of equivalent amount spent by an employee from the salary	Deduction of twice the amount spent by an employee from the salary	Deduction of thrice the amount spent by an employee from the salary
6	Intentional faulty complaints	HR Unit	Evidence	Written Warning	Written Warning	Termination	

Category 2							
7	Conviction by a court of law for any criminal offence or offenses of turpitude	HR Unit after finding records of conviction	Conviction Record	Termination			
8	Smoking in the enclosed premises of TDEA	HR Unit after verifying the complaint	Eyewitness' Account	Deduction of PKR 1,000 from salary on advice of HR Unit	Deduction of PKR 5,000 from salary on advice of HR Unit	Deduction of PKR 10,000 from salary on advice of HR Unit	Deduction of PKR 25,000 from salary on advice of HR Unit

9	Reporting for work or being on duty with intoxication	HR Unit after verifying the complaint	Eyewitness' Account	Written Warning	Termination		
10	Gambling or promoting gambling in the office	HR Unit after verifying the complaint	Eyewitness' Account	Termination			
11	Wrangling/Brawling	HR Unit after verifying the complaint	Eyewitness' Account	Written Warning by Manager notified to HR Unit	Written Warning	Written Warning	Termination
12	Deliberate falsification of TDEA/FAFEN records/Deliberate submission of fake personal records such as medical claims/ educational certificates etc.	HR Unit after verifying the complaint	Evidence of Falsification	Termination with withholding of terminal benefits			
13	Giving wrong information about personal particulars and previous service(s)	HR Unit after verifying the complaint	Evidence of Falsification	Termination with withholding of terminal benefits and possibility of legal action			
14	Undertaking private paid work of any nature without taking prior approval	HR Unit after verifying the complaint	Evidence of Paid Work	Written Warning	Termination		
15	Taking or giving of bribes or any illegal gratification	HR Unit after verifying the complaint	Evidence of Bribe	Termination			
16	Unauthorized media appearance or statements or approaching any business firm, government or private organization without following the procedures set by the organization or obtaining necessary approvals	HR Unit after verifying the complaint	Evidence of Representation	Written Warning by Manager notified to HR Unit	Written Warning	Written Warning	Termination
17	Taking or accepting any gift or award from any individual or institution whatsoever, in connection with the	HR Unit after verifying the complaint	Evidence	Written Warning by Manager notified to HR Unit	Written Warning	Written Warning	Termination

	official work, without prior approval of authority; or accepting hospitality while working outside the office beyond cultural norms of the area, which may place an unreasonable burden on the host or expose the staff member(s) and/or TDEA/FAFEN to future liabilities						
18	Deliberately giving confidential or restricted information to unauthorized person(s)	HR Unit after verifying the complaint	Evidence	Termination			
19	Misuse of office premises/equipment and facilities or personal use out of the limits set by the organization or without prior approval from the Administration Officer	HR Unit after verifying the complaint by Admin Officer or Network Administrator	Evidence	Written Warning	Written Warning	Termination	
20	Watching restricted content such as pornographic materials on office computers	HR Unit after verifying the Complaint by Network Administrator	Evidence	Written Warning	Termination		
21	Malicious/Willful damage or destruction of TDEA property	HR Unit on after verifying Complaint to be submitted by Admin Officer	Written Affidavit by Admin Officer of the damage, estimation of damage and eyewitness' account	Deduction of amount equivalent to damage as determined by the Admin Officer and Written warning	Deduction of twice the amount equivalent to damage as determined by the Admin Officer and Written warning	Termination	
22	Theft, fraud or dishonesty in connection with TDEA funds or property/valuables of other colleagues;	HR Unit on Complaint by Admin Officer, Internal Auditor	Written Affidavit by Admin Officer/internal auditor of the damage, estimation of damage and	Termination with withholding of terminal benefits			

			eyewitness account				
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Category 3							
23	Work output is not in accordance with the standard set in the work-plan and job description	Relevant Manager	Manager's Correspondence with Employee	Written Warning by Manager notified to HR Unit	Written Warning	Written Warning	Termination
24	Excessive defective work due to staff members own errors;	Relevant Manager	Manager's Correspondence with Employee	Written Warning by Manager notified to HR Unit	Written Warning	Written Warning	Termination
25	Gross/Willful insubordination or disobedience, misbehavior with any lawful and reasonable instructions by Manager	Relevant Manager	Manager's Correspondence with Employee and eye witness account	Written Warning by Manager notified to HR Unit	Written Warning	Written Warning	Termination
26	Gross misbehavior with immediate subordinate	Relevant Manager on the complaint of subordinate	Eyewitness Account	Written Warning by Manager notified to HR Unit	Written Warning	Written Warning	Termination
27	Violation of TDEA Code of Ethics {Minor}	HR Unit after verifying the complaint	Any Evidence of Falsification	Written warning by supervisor, notifying to HR Unit	Written warning	Written warning	Termination
	Termination and withholding of terminal benefits						
28	Violation of CRC Policy of TDEA {Minor}	Appointed CRC Committee	Any Evidence of Falsification	Written warning (with recovery of any loss to organization)	Termination and withholding of terminal benefits and recovery of any loss to Organization		
	Termination and withholding of terminal benefitsand recovery of any loss to Organization ⁵⁴						

Category 4							
29	Harassment of all kinds, especially sexual harassment of all types as per	Sexual Harassment Committee		Termination with withholding of terminal benefits			

⁵⁴ The CEO approved the addition in Section 14 under Category 3 (Serial Nos. 27 and 28).
Effective Date of Implementation: May 1, 2015.

	organizational policy;						
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Complaints Procedure

Category of Misconduct	First Warning					Second Warning	Third Warning	Termination	Enquiry Procedure
1	HR Unit fills out the form and furnishes the evidence	Warning 1 Issued				Same procedure as Step 1	Same procedure as Step 1	IDC to approve Termination on Fourth Instance	IDC is not an investigation body. Its mandate is to only verify that the misconduct has been committed and penalize according to the defined procedure. Any referral to the IDC shall be by the Friday of the week it meets
2 and 3	HR Unit receives the complaint	HR Unit verifies the evidence	Warning Issued			Same procedure as Step 1	Same procedure as Step 1	IDC to approve Termination on Fourth Instance	
		HR Unit rejects the evidence	Complainant Informed and in case complaint found to be intentional and frivolous, complainant issued warning 1			Same procedure as Step 1	Same procedure as Step 1	IDC to approve Termination on Fourth Instance	
		HR Unit forwards the evidence to IDC	IDC takes up the evidence at its fortnightly meeting	IDC verifies the evidence	Warning Issued	Same procedure as Step 1	Same procedure as Step 1	IDC to approve Termination on Fourth Instance	
				IDC rejects the evidence	Complainant Informed and in case complaint found to be intentional and frivolous, complainant issued warning 1	Same procedure as Step 1	Same procedure as Step 1	IDC to Approve Termination on Fourth Instance	
4	HR Unit or complainant forwards complaint to Sexual Harassment Committee								

15. PERFORMANCE MANAGEMENT AND DEVELOPMENT⁵⁵

The Performance Management and Development policy applies to all TDEA employees. The purpose of this policy is to ensure the Performance and Development System supports and maintains a culture of learning, innovation, leadership, and accountability. The policy will support the achievement of enhanced leadership and performance management across the organization.

Performance Management is a systematic approach towards maximizing both individual as well as organizational performance. TDEA assesses the performance of employees against assigned outcomes, outputs, and deliverables given in the work plan. The word “Task” is broadly used for outcomes, outputs, deliverables, and sub-deliverables in this document and Task Management System. TDEA has two performance appraisal cycles, conducted respectively on June 30 and December 31, during each financial year.

15.1. Performance Management Process

TDEA prepares consolidated work plans based on a tier-focused work planning structure. The performance management process of employees at an individual level will be linked with TDEA’s consolidated work plan.

At the beginning of the performance period, the Chief Executive Officer (CEO) will determine strategic-level ‘**Outcomes**’ for the organization and assign to the Directors. Based on the outcomes, the teams will develop work plans. All Team leads will hold a quarterly work planning meeting in the last week of the closing quarter, to review and reconcile deliverables and sub-deliverables and adjust any remaining targets/deliverables. The work plan will then be finalized by Directors, and Team Leads during review meetings, based on which, the implementation process will be initiated. All the relevant stakeholders may consider reasonable flexibility in the work plan during the course of implementation, to cater to any unplanned or urgent tasks.

15.2. Assignment of Responsibilities

Once the overall organizational level work plan has been reviewed, reconciled, and finalized, responsibilities or tasks will be assigned through the ‘Task Management System’ in the following order during the performance period.

- CEO will assign ‘**outcomes**’ to the Directors
- Directors will assign ‘**outputs**’ to the Team Leads
- Team leads will assign ‘**deliverables**’ to the Thematic leads
- Thematic leads will assign ‘**Sub-deliverables**’ to their respective team members

15.3. Task Management System

All new employees will be given an orientation of the Task Management System, which is a part of TDEA’s online Human Resources Management System (HRMS). The system is primarily used for assignment of tasks along with tracking the progress and evaluation of

⁵⁵ Old Performance Appraisal Policy Repealed. New Task Management System based Performance Appraisal policy approved in 36th Board Meeting and effective date of implementation is January 01, 2021.

performance against assigned tasks. It caters to both, planned as well as unplanned tasks. For each task, the supervisor provides feedback and evaluation scores for the team member's performance on the assigned task. The system enables both supervisors as well as employees, to review their performance on an active basis throughout the year. A feedback mechanism for employees regarding their supervisor is also a feature of the system. Similarly, Directors and Team leads can also view the progress of tasks assigned to each team member in their respective units. This gives a broader opportunity to Directors and Team Leads to resolve any visible decline in performance and to provide support to employees promptly. This also provides high-performing employees with a platform to showcase their work and commitment, and serves as an incentivization medium for other employees to improve on their past performances.

This consistent mechanism of performance delivery and monitoring serves as an opportunity for both, employee as well as supervisor, to ensure:

- Performance delivery is in line with expectations;
- Challenges are discussed promptly, and solutions are offered in terms of support/remedy;
- Performance goals are still relevant in relation to any changes in the institutional outcomes; and
- Development activities are progressing at a rate that supports optimal performance.

The monitoring of performance and provision of feedback may take place through a number of methods which may include, among others, updates on task status, progress review meetings, and coaching, etc.

TDEA ranks performance on the basis of established tasks performed and measures them on a scale ranging from 1 to 3:

Performance Rating	Ranking
Below Expectations	1
Meets expectations	2
Exceeds expectations	3

All tasks assigned to an employee will be evaluated on this ranking scale during the performance period.

15.4. Performance Review Procedure

The annual performance appraisal process will be a combination of tasks evaluated in the Task Management System. During the evaluation process, the supervisor will have a consultative meeting with the respective team member to discuss employee feedback with regards to performance and subsequently, record overall feedback about the performance of an employee. It is also important that supervisors and employees agree on professional development activities for the next appraisal cycle to enable capacity building and professional development. The Performance Appraisal Form, after the endorsement of the second-line

supervisor, will be submitted to the HR Unit. The Director's performance appraisal will be evaluated on the basis of outcomes assigned to them. Similarly, the performance of Team Lead's will be assessed on the basis of the outputs assigned to them during the performance period.

The HR Unit will then tabulate the scores and formulate the overall scoreboard, which will be presented to the CEO for approval.

The Annual Performance Appraisal Form shall comprise of the following sections:

Section 1:	Task Evaluation Module
Section 2:	Overall Performance Grid
Section 3:	Individual Learning Plan
Section 4:	Human Resources Score

15.5. Section 1: Task Evaluation Module

TDEA's Task Evaluation Module consists of tasks evaluated through HRMS during the course of the performance period, providing employees access to continuous feedback on their performance throughout the year. Evaluation score available against each task shall be taken into account and tabulated for the total performance appraisal score of the employee under this section.

15.6. Achievements

Key achievements may be noted by the employee and supervisor during the performance period where instances of exceptional scores for certain tasks or performance along with a note of evidence justifying the achievement will be documented by the supervisor through the Task Management System.

15.7. Disagreements

In case of disagreement on the nature, performance, output, or evolution of task, the team members may discuss it with their relevant supervisor for swift resolution of issue. In instances where the disagreement is not resolved through the supervisor, the next in line supervisor along with a HR representative may be engaged to reach an agreement.

15.8. Ratings

1. The assessment shall be carried out by the supervisor against each task during the performance period.
2. Evidence is required for rating 1 and 3, the relevant supervisor shall provide reason(s) as to how the output remained below or above expectations.

The primary responsibility of submitting adequate documentation lies with the supervisor. The HR Unit shall not accept any incomplete Performance Appraisal Forms or forms that lack adequate documentation through evidence. However, the HR Unit will remain available for

guiding employees and supervisors on the proper procedure of establishing evidence and resolve any queries or concerns regarding the process. In case the score in any form is not substantiated by valid evidence, it shall be scored at 2, the discretion of which lies with the Performance Review Committee.

15.9. Section 2: Overall Performance Score

After submission of the complete performance appraisal form, HRMS will calculate the overall performance score summary of an employee. The supervisor may write an Overall Performance Feedback at the time of submission. This may include positive feedback and/or areas of improvement.

15.10. Section 3: Individual Learning Plan

The other objective of the performance appraisal process is to identify capacity building needs, which may be required to fill gaps or observed lapses in key performance areas, in addition, to enhance knowledge and skills for career advancement at TDEA. Supervisors may identify suitable learning and development needs of the team member(s) during the performance period.

In instances where an employee has worked with more than one supervisor during the appraisal period, the performance appraisal ratings shall be carried out jointly by them, and after the agreement, the appraisal form shall be signed off by both or all of them.

Format available on HRMS is given below:

Development area (knowledge, skill, or behaviours)	Action to meet development area	Target date	Review notes (enter date and summary/key points of review)

Agreed upon by:

Line Manager signature:		Date:	
Employee signature:		Date:	

15.11. Implementation

Performance appraisal of all employees will be conducted through online HRMS. The Task Management System is a key component in the performance appraisal process, which will provide evolution score against each task performed. The online performance appraisal may be customized/amended, if required, which is subject to directions by the Annual performance appraisals must be initiated at least one month prior to the due date of annual appraisal.

Indicative Timelines for Performance Appraisal Process

Step	Responsibility	Function	Timeline for Annual Appraisal
1	HR Focal Person	Email alert to supervisor to initiate the assessment process	One month prior to due date of annual appraisal
2	Supervisor of concerned staff member(s)	Submission of complete form <i>Note:</i> Failure of timely submission may result in written warning to the supervisor by the HR Unit	One day per subordinate, maximum within 5 days of alert
3	Review Committee	To furnish recommendations for cases of exceeding expectations	Five days after submission of appraisals
4	HR Focal Person	Calculation of final Task-based and furnishing first draft of report to review committee Forward to Finance Unit for financial review Forward to management for approval	7 days
5	Senior Management	Review of ratings, implications and sign off by Senior Management	5 days
6	HR Focal Person	Finalization and presentation of Performance Analysis Report and sharing scores with staff	7 days
7	HR Focal Person	Renewal of Contracts/Increment Letters	7 days

15.12. Marking and Calculations

Apart from the assessments mentioned above, the following points contribute to the scoring of an employee:

1. *Human Resources:* 20 of every employee's overall performance appraisal score shall be calculated by the HR Unit as per the following table:

1	Human Resources Score	Required Score
	Habitual Tardiness (Attendance Record, on time arrival)	5
	Uninformed Absents	5
	Timesheet submission (Timely Submission of timesheets)	5
	Performance Appraisal Submission (Timely submission of Appraisal)	5
	TOTAL	20
2	Deductions	Rate of Deduction
	Deduction per warning letter	5
	Action for minor offense recommended by IDC or Harassment Committee	5
	Action for major offense recommended by IDC or Harassment Committee	10
	NET TOTAL	20

2. *Overall Score Board:* The following categories of assessment shall contribute to the score of an employee:
 - Task-Based Assessment.
 - Human Resources Score – As per Human Resources Score table above.

The weightage for the above is as follows:

Sections	Weightage
Task Based Performance Appraisal	80%
Human Resources	20%
Total	100%

Example: Below is an example of how HRMS will tabulate scores.

Task Based Performance Appraisal (85% weight)	Ratings	Task	Total	Weighted Average	GRAND TOTAL
	1	5	5		
	2	25	50		
	3	10	30		
Sum		40	85		
Average			28		
Weighted Average on Task (score average / number of tasks evaluated)				70.8	
Total Contribution (80% of Weighted Average)					63.04
Human Resources (20% weight)					
Total HR Score				18	18
TOTAL Appraisal Score					81.04

15.13. Review Committee

In order to review and resolve cases of employees that are performing below expectations or exceeding expectations, a Review Committee will be set up. The committee shall comprise of the following personnel:

- Chief Executive Officer
- HR Representative
- Relevant supervisor

The relevant supervisor shall provide justification for the proposed additional performance increment to the review committee or highlight instances of decreasing performance for further action.

15.14. Implications

The aim of a 3-point rating system is to ensure that the assessment exercise provides maximum benefit to the employees who have performed better than what was expected of them. Ratings of 1 and 3 will be treated as exceptional circumstances, which have been well above or below the expectations.

15.15. Performance Rewards

TDEA may reward best performing employees.

- Employees scoring lower than 65 in the overall performance score will be categorized as below expectations performers and may not be entitled for any upcoming increments.
- Employees who are meeting expectations with an overall performance score of 65 or above, may be rewarded 5% increment on their gross salaries.
- Employees with overall performance scores of 80 or above shall be eligible for an increment ranging from 5% to 15%. However, this will be strictly dependent on the provision of adequate justification by the supervisor.

The CEO shall be the final approving authority for the increments. The top five highest scoring employees may receive a shield and/or a certificate. The highest scoring employee may also receive a cash award, subject to the availability of resources/funds. The amount of the cash award shall be decided by the CEO. All appraisal-based increments shall be effective from July 1 or January 1.

16. TRAINING AND DEVELOPMENT GUIDELINES⁵⁶

16.1. Purpose

The main objective of training and development at TDEA is to help develop key competencies which enable individuals to perform current or future jobs successfully. In this regard, all training and development programs organized by the Human Resources Department shall be geared towards the following objectives:

- Strengthening the job skills/knowledge of employees;
- Improving operational efficiency and productivity; and/or
- Developing the potential of employees for maximizing mutual benefit to individuals and TDEA.

16.2. Policy

The basic policy in administering and implementing any type of training or development activity is in accordance with the strategic business objectives of TDEA. The HR Unit shall work closely with heads of other Units/Departments in assessing areas that need training and development support.

TDEA emphasizes the development of its staff for pursuance of its both short-term and long-term objectives. TDEA encourages and allows its staff to avail opportunities for new learning and developments in the relevant fields to keep their knowledge and skills updated. Staff development also attains importance as TDEA's work, strategy, and approach is unique in the country which requires development of human resource at its own.

At the same time TDEA acknowledges that capacity building is a legitimate need of staff members for their career growth. Capacity building is a process in which staff members are expected to take proactive responsibility for their development, which also benefits the organization by expanding its work, improving efficiency, and effectiveness. To formalize the staff development program, a procedure has been introduced for capacity assessment of each staff member at the time of performance appraisal which is carried out twice a year.

Actions undertaken in such instances shall be mutually agreed on. Updated progress on capacity building efforts shall also be reported in the next performance appraisal. The HR focal person shall coordinate and facilitate capacity building efforts.

16.3. Guidelines

1. For staff capacity building, all possible means must be considered and used as appropriate. Various methods include reading reference materials (books, reports of similar work done by organizations in other countries, etc.), establish reading groups, making presentations and/or leading discussions on topics/functions agreed for capacity building, website reviews, distant learning, formal or informal trainings, workshops, seminars, joining and contributing in relevant e-mail groups, participation in relevant meetings, exposure visits, sending staff to other CSOs or departments for short-term assignments, enhancing academic qualifications (studying part time), etc.
2. For all new appointments the capacity need assessment shall be done at the time of completion of probation period and required actions shall be agreed between the staff member, the supervisor, and the HR focal person.

⁵⁶ Professional Membership Fee Reimbursement Policy Repealed on 32nd Board Meeting on August 03, 2019.

3. TDEA invites all the staff members and their respective supervisors to propose capacity needs, preferably at the time of performance appraisal in relation to the specific job objectives and functions. However, due to several limitations including financial constraints, TDEA may not be able to fulfil all needs. Proposing capacity building needs is not restricted to performance appraisal, it can also be indicated at any time by the staff member and/or the supervisor;
4. The HR focal person shall facilitate the staff members in execution of capacity building plans, through identifying available opportunities, prompting follow ups of agreed actions to the concerned staff and the respective supervisors. The focal person shall also facilitate staff in availing identified and approved capacity building opportunities.
5. Staff members themselves are primarily responsible for ensuring that their capacity building needs are reflected in their performance appraisal forms. The immediate supervisor is expected to take active part and pursue staff for their capacity building plans including identification of capacity building needs, planning, implementing and evaluating the impact of capacity building.
6. Staff Development Application Form (*attached as Annex No. 27*) may be used to identify, get necessary approval, document benefits and details, and carryout/attend capacity building activities/opportunities.
7. Capacity buildings opportunities shall not and must not be viewed as perk or break from work and must be utilized for the benefit of TDEA.
8. Several unknown but relevant capacity building opportunities turn up during the year which are not only cost efficient but also allow interactive learning. TDEA shall utilize the relevant opportunities for the relevant staff subject to the availability of funds, suitability of timing, and as per the criteria given below.
9. For external capacity building opportunities, the Secretariat staff, Members of Board, staff members of member organizations shall be considered. All invitations/announcements for capacity building opportunities shall be received at the Secretariat for nomination(s) from TDEA. All capacity building opportunities, whether in country or abroad shall be decided by the CEO as per the nature of opportunity. If an opportunity is decided for the Secretariat staff (*see Section 12*), it shall be circulated to the relevant staff members for nominations.
10. If the relevant staff member already have availed a similar opportunity, the next opportunity shall be offered to the next relevant person. However, any staff member shall not be barred from attending successive opportunities relevant to his/her field of work.
11. Keeping in view the possible conflict of interests, the CEO shall decide the nature of capacity building opportunity (for members or staff). In case of self-nomination, the CEO shall obtain approval from the Board.
12. All training and other capacity building invitations received shall be forwarded to the CEO. After deciding the nature of opportunity, the invitation shall be circulated to the relevant staff, who can apply for the capacity building opportunity by filling the Staff Development Application Form.

16.4. Types of Training/Development Activities

1. Staff training/development activities can be initiated by the employer or employee. In either case, it has to be approved by the manager in charge of the department or

- above with additional endorsement from the HR Unit or the CEO.
- 2. Employee-initiated training/development activities may include external programs that are organized by external training institutes or by TDEA or with other institutes for the general public.
- 3. Employer-initiated programs may take the form of offering sponsorship or employees to attend external programs or organizing such programs in-house.
- 4. Depending on the nature of needs and operational requirements, training/development programs may also be implemented as job induction, job rotation, on-the-job coaching, counselling, individual or group projects, and inter-project transfer.

16.5. Annual Training Needs Assessment

The HR Unit shall be responsible for conducting an analysis of the competency and skill-based assessments of all employees and identify areas of improvement as *Critical*, *Room for Improvement* and *No Need for Training*. Once the areas have been identified, the HR Unit shall raise the need for proposed trainings in the required areas and may develop a priority-based annual calendar that can be forwarded to the Capacity Building Unit for implementation.

16.6. Conditions for Sponsorship

The employees are eligible to apply for sponsorship under the following conditions:

16.6.1. External Training Programs

1. *Identification*: If the available training/option has relevance to the aspects identified in the capacity building needs of the staff member or is considered relevant to the staff member work objectives by the relevant supervisor; private interest or personal career aspirations are not sufficient reasons for seeking training sponsorship.
2. *Credibility of the training event*: The training is offered by a credible institution, the credibility shall be assessed by the HR focal person and the CEO;
3. *Length of service*: The applying staff member is confirmed (not on probation). However, exception can be made if an employee on probation is highly recommended by his/her Unit Manager to attend a program urgently required for his/her job. Seniority of staff members shall be considered in cases where more than one relevant staff members have applied for any specific opportunity.
4. *Redundancy*: They have not previously been sponsored for the same or similar programs. Refresher programs shall normally not be sponsored.
5. *Positive action*: Preference shall be given to the women staff and the ethnic minorities to help them prepare for senior positions and others roles in which they are under-represented.
6. *Manager support*: The manager of the applying staff member agrees to and approves of the application form.
7. *Opportunity*: They shall normally be sponsored for only one program at a time unless the additional program is a luncheon or short seminar, an in-house program or a sit-in securities/derivatives-related program that is highly recommended by their Unit Managers and urgently required for their jobs.
8. *Personal endeavors*: If the program is initiated and implemented by the employees themselves and takes place within office hours, they are required to apply for annual leave to cover their absence.
9. If the training is conducted after office-hours, the time taken to attend training shall

not be considered as overtime.

10. Their release to attend the program shall not affect the operation of their Unit.

16.6.2. Overseas Training

Overseas training shall be granted subject to the following conditions:

- The training is genuinely required and not available locally.
- Confirmation of employment.
- Flight passage and hotel arrangement should follow TDEA Travel Policy.
- Prior written approval by the CEO is required for all overseas travel.
- Overseas training should be approved by the supervisor/manager and the HR Unit.
- Any exceptions to the above conditions should be approved by the CEO.

A completed Staff Development Application Form must be submitted to the HR Unit at least a week prior to the commencement of the program or its enrolment deadline, whichever is earlier. Failure to do so, the applications may not be approved or the applicants shall be required to pay the institute first if the application is approved.

16.7. Academic Programs

TDEA may consider staff requests about supporting their academic advancement by giving time relaxation, financial assistance or other facilitation on case to case basis. Such requests must indicate the plan, any effect on the job and help required from the organization to be forwarded to the CEO through the respective supervisor using the prescribed form. All such academic enrolments must be in the knowledge of the supervisor, the Unit manager, the HR Unit and the CEO. The CEO is the approving authority for such requests, after considering different aspects of the request and its impact on the staff member's job.

16.7.1. Obligatory Service

For all categories of programs, if the sponsorship exceeds PKR 50,000 the employee shall be required to serve an obligatory service period on satisfactory completion of the whole program, counting from the calendar date after the last trainings assigned or the issuance date of result/certificate, which ever comes later.

16.8. Trainee Programs for Fresh Graduates

TDEA's Trainee Program is designed to allow fresh graduates a learning start to their career and for TDEA to induct fresh blood into the organization. Fresh graduates may be recruited on an internship program for learning and development opportunities.

17. SUCCESSION PLANNING

17.1. Policy

TDEA is committed to ensuring its structure and people have the capabilities and capacity to meet its goals and objectives.

17.2. Purpose

Succession Planning is a process where TDEA seeks to understand its future capability needs, identify potential talent gaps and seek to remedy those gaps through the development and progression of staff. A structured process ensures leadership continuity in key positions, and aims to retain and develop institutional knowledge and relationships for the future. The process ranges from identifying and developing employees in specific positions to fill executive positions and to develop a talent pool with capacity to be effective leaders in any number of key positions in an organization.

17.3. Process

The HR Unit shall maintain a Succession Chart (*template attached as Annex No. 28*) in collaboration with TDEA's Management. The chart shall track succession planning for all leadership roles within the organization and address the following questions:

1. Key leadership designation.
2. Current status (Employed/Vacant).
3. Date of departure/Dissolution of post/End of notice period.
4. Priority (Urgent/High/Medium/Low).
5. Required subject of expertise.
6. Successor secured? (Yes/No).
7. Potential and secondary successor (identified in accordance with task-based performance appraisal and by the Management Committee).
8. Readiness (Prepared/Minor gaps/Major Gaps/Unfit).
9. Lacking competencies (identified in accordance with competency-performance appraisal).
10. Training plan for lacking competencies.

The HR Unit shall manage all areas of succession planning to support the organization in managing smooth transitions and unavailability of TDEA leaders. While the succession chart aims to focus on key leadership positions, the HR Unit shall also be required to maintain the chart for all employees on planned or unplanned leaves up to or exceeding a week.

17.3.1. Identifying TDEA Leaders: Critical Capacity

TDEA believes in building critical capacity in the organization in support for critical roles, this shall provide flexibility when staff take leave or if staff take other roles. The Management Committee shall identify all key leadership positions and share them with the HR Unit, which shall map critical positions and maintain the succession chart for all identified positions.

The Management Committee compares the current and future capability needs against the current capability of the organization to determine gaps. All managers are required to document capability gaps for their department and complete this process after any change in the department and after Staff Performance appraisals.

A completed Succession Chart is to be sent by all Unit Managers to the Manager Human Resources who shall report the overall TDEA Succession Chart to the Management Committee for finalization and approval.

17.3.2. Emergency Succession Plan

In the event that an employee in an identified leadership position suddenly departs, either permanently or for an extended period of time (i.e. longer than three months), the organization should have the following information in hand:

1. Identification of key daily activities of the position that need looking after.
2. Identification of priority functions of the position.
3. Written instructions for temporary/officiating replacement pre-written by the employee.
4. A list of people who should be notified about the absence immediately: subordinates, supervisors, team members, stakeholders etc.

17.3.3. Departure-Defined Succession Planning

Employers risk losing important skills and knowledge when employees retire or move on. Therefore, all TDEA employees serving their notice, expectation post dissolution or contract expiry within a month's time shall be expected to adhere to the following handing/taking over process for the smooth transition of their key responsibilities and transfer of their institutional knowledge:

1. Identification of a permanent replacement or acting substitute.
2. Updated work documentation that can be readily managed.
3. Training and orientation sessions during notice period (if applicable) to replacement.
4. In case of position expiry, organization of all data according to communication and IT policy.
5. List of pending tasks in consultation with supervisor and senior management.
6. Contact list of key stakeholders.

18. SEXUAL HARASSMENT POLICY

18.1. Purpose

The purpose of this policy is to set forth TDEA's procedures for preventing sexual harassment and for investigating and resolving allegations of sexual harassment, and also to ensure compliance with the Protection against Harassment at Workplace Act, 2010 as passed by the National Assembly of Pakistan on March 11, 2010, and as amended. TDEA/FAFEN strictly prohibits all forms of gender-based discrimination and sexual harassment and is committed to providing and promoting an atmosphere in which employees can realize their maximum potential in the workplace and engage fully in learning processes.

All employees are responsible for ensuring that the workplace is free from sexual harassment. Because of TDEA's strong disapproval of offensive or inappropriate sexual behavior at work, all employees must avoid any action or conduct which could be viewed as sexual harassment. TDEA's Management is responsible for periodically conducting awareness sessions for the staff about sexual harassment and its consequences for victim/affected person and accused to ensure a positive and conducive environment for its employees.

18.2. Policy

18.2.1. Definition

Sexual harassment means any unwelcome sexual advance, request for sexual favors or other verbal or physical conduct of a sexual nature or sexually demeaning attitudes, causing interference with work performance or creating an intimidating, hostile or offensive work environment, passing on pornographic material in print or electronic form, or passing on written offensive messages of a sexual nature.

Any such act if made a condition for employment or to obtain certain job benefits (wage increase, promotion, training opportunity, transfer or the job itself) by a person in authority or the attempt to punish the complainant for refusal to comply with such a request is also sexual harassment.

Any expression that suggests superiority of one gender over the other should be avoided. Such expressions may include jokes that demean one gender, unwelcome references to a person's appearance or body, where they cause psychological harassment and serve to deny colleagues their dignity and respect and contribute to an atmosphere in which inequality is emphasized.

Such expressions, if persistent, may constitute gender harassment. Recurring acts which may have a cumulative effect or a single severe incident would be considered enough to establish gender harassment.

Gender harassment includes, but not limited to: verbal harassment or abuse, subtle pressure for sexual acts, sexual advances in the pretext of narrating sexual incidents, touching, patting or pinching, leering at a person's body, demanding sexual favors accompanied by subtle or overt threats concerning employment or advancement; and physical assault including rape.

The above mentioned forms of harassment are not always distinct from each other and can occur simultaneously. Additionally, harassment can happen to men and women at all levels of job hierarchy and between all relationships of equal and unequal power. The harassment can occur outside working hours and workplace. It is the access that a perpetrator has to the person being harassed by virtue of a job situation or relation.

18.2.2. Applicability

Provisions of this section are applicable to all secretariat and field staff of TDEA-FAFEN including temporary staff such as consultants, interns, volunteers, daily paid workers, data entry operators, etc. Sexual harassment of any kind shall be considered as 'misconduct' and strict action shall be taken against the accused person as per the procedure given below.

The provisions shall also be applicable to visitors at the organization and representatives of member organizations of TDEA-FAFEN while they interact with the Secretariat staff or attend a TDEA-FAFEN Secretariat activity and vice versa.

18.3. Inquiry Committee

A three member Inquiry committee consisting of following members shall be constituted to receive complaints of sexual harassment and conduct further proceedings. It is mandatory that out of the three members, at least one member shall be a woman.

1. A member from the Senior Management selected by the female staff.
2. A female senior representative of employees or a senior female employee, nominated by the Management and selected by female staff.
3. One or more members of the Senior Management or the Board may be co-opted to complete the strength of the committee. An external member may also be co-opted in the case that one of the key members is accused or one of the key members reports directly or indirectly to the accused.
4. A Chairperson shall be designated from among the members of the Committee.

The Committee's meetings shall be convened on need basis and the committee members shall be revised after a year. It is in the interest of TDEA-FAFEN to create and maintain a work environment free of intimidation and abuse for collective productivity and individual job satisfaction.

The Committee is expected to discuss and take necessary actions (training, awareness etc.) to prevent incidences of sexual harassment in the organization. The inquiry committee shall have the following powers to:

1. Summon and enforce attendance of any person and examine him on oath.
2. Require the discovery and production of any document.
3. Receive evidence on affidavits.
4. Record the evidence.
5. Inquire into the matters of sexual harassment under this Act and recommend appropriate penalty against the accused as mentioned in.
6. Recommend to the court of law for appropriate action against the complainant if allegations levelled against the accused are found to be false and made with mala fide intentions.
7. Treat the proceedings, statements and other evidence as confidential.
8. Regulate its own procedure for conducting inquiry and for fixing place and time of its sitting.

18.4. Procedure

A complainant may find it difficult to report gender harassment because of fear of embarrassment, publicity, economic vulnerability, and fear of retaliation by the accused, co-worker or employer.

The filing of sexual harassment complaint should not be seen as detrimental to the image of the organization, rather as an opportunity to deal with problem, to restore confidence of staff members and to indicate that management takes such complaints seriously and professionally (*Compliant/Grievance Form attached as Annex No. 29*).

Any victim of sexual harassment may bring the act in the notice of concerned supervisor or any of the Inquiry Committee members informally, if s/he feels appropriate, without making a formal complaint. Any such informal complaint may be resolved through mediation between the parties involved and by providing advice and counselling on a strictly confidential basis. Making an informal complaint does not affect staff member's right to make a formal complaint; s/he can launch a formal complaint at any time.

If the incident reported does constitute gender harassment of a higher degree and the mediator(s) feel it should be formally taken up for disciplinary action, with the agreement of complainant, the case can be taken as a formal complaint. Any aggrieved staff member can launch a formal complaint through her supervisor, directly to any member of the inquiry committee, the HR focal person, or any member of the Senior Management they feel comfortable with, whereby the person approached is obligated to initiate the process of investigation and not to cover up or obstruct the inquiry.

In case a complaint is launched against a member of senior management, to avoid the possibility of influencing the inquiry proceedings, no member of the inquiry committee should be in a position where they directly or indirectly report to the accused. Any such member of the inquiry committee shall not be part of the inquiry. In such cases the strength of committee shall be completed by inviting members from the Board.

18.5. Inquiry

1. On receiving a formal complaint, the inquiry committee shall ask the complainant to prepare a detailed statement of incidents on the prescribed TDEA Complaint Grievance Form, in case the written complaint is not detailed. A statement of charges and allegations shall be drawn by the Committee and sent to the accused within three days of receipt of complaint, the formal receipt of which must be given.
2. The accused shall be asked to respond to the statement of allegations and submit a written response to the committee within the specified time (two days) and on his failure to do so without reasonable cause, the committee shall proceed without his participation or input.
3. The statements and other evidence acquired in the inquiry process shall be considered confidential. The committee shall ensure confidentiality during the whole inquiry process.
4. On receipt of response from the accused, the committee may decide to organize verbal hearings of the complainant and the accused. Hearing(s) may be held either in presence of both the complainant and the accused, or separately, as deemed fit by the committee within three days of receipt of response from the accused.
5. The committee shall enquire into the charge and may examine such oral, electronic, and documentary or any other evidence in support of the charge or in defense of the

accused as the committee may consider necessary and each party shall be entitled to cross-examine the witness against them. Care should be taken to avoid any retaliation against witnesses by giving necessary protection and/or maintaining confidentiality.

6. The investigation procedure should be completed as soon as possible. The inquiry and the implementation of the decision should not take more than two weeks.

The following provisions shall be followed by the committee in relation to the inquiry:

1. An officer may be nominated to provide advice and assistance to each party, if considered necessary.
2. Both parties, the complainant and the accused, shall have the right to be represented or accompanied by a Collective Bargaining Agent representative, a friend or a colleague.
3. No adverse action shall be taken against the complainant or the witness. However, in case the allegations levelled against the accused are found to be false or made with mal-intentions; the appropriate action will be taken.
4. The Inquiry Committee shall ensure that the employer or accused shall in no case create any hostile environment for the complainant so as to pressurize her from freely pursuing her compliant;
5. The committee shall give its findings in writing by recording reasons thereof.

18.6. Conducive Environment for Inquiry

Respective supervisors of the two staff members involved should do their best to temporarily make adjustments so that the accused and the complainant do not have to interact intensely for official purposes during the inquiry period. The Management can also decide to send the accused and/or complainant on leave, in accordance with applicable procedures for dealing with the cases of misconduct, if required.

Retaliation from either party should be strictly monitored. During the process of the inquiry, evaluations, daily duties, reporting structure, and any parallel inquiries initiated should be strictly monitored to avoid any retaliation from either side.

18.7. Evidence

It is common that gender harassment usually occurs between colleagues when they are alone; therefore it is difficult to produce typical evidence(s). It is strongly recommended that staff should report an offensive behavior immediately to someone they trust, even if they do not wish to launch a formal complaint at the time.

However, not reporting immediately shall not affect the merits of the case. Among others, following shall be considered as evidence:

1. Detailed account of the complainant and the accused.
2. Witness statements.
3. Statements of persons with whom complainant might have discussed the incident, statements of persons from whom advice may have informally been sought.
4. Any other evidence including, but not restricted to: documents, circumstantial, audio, video or electronic records.

18.8. Decision

The committee shall take the decision after carefully reviewing the circumstances, evidence, and relevant statements in all fairness maximum within 30 days of the initiation of inquiry. If the accused staff member is found not guilty, the complaint shall be dismissed. If found guilty, the committee shall recommend the imposition of one or more of the following penalties:

18.8.1. Minor Penalties

1. Verbal warning/reprimands that is noted in the person's employment record.
2. Written warning noted in the employment record.
3. Written apology along with a statement of not repeating any such act; if one such apology has already been submitted, repeat act shall lead to termination of the staff member.
4. Stoppage of promotion or financial increment for a specific period.
5. Putting a confirm staff member on probation.
6. Recovery of the compensation payable to the complainant from pay or any other source of the accused.

18.8.2. Major Penalties:

1. Demotion to a lower post.
2. Compulsory retirement.
3. Termination from service with notice period or withholding notice period salary and/or other benefits as recommended by the authority.
4. Dismissal from service without notice or pay in lieu of the notice period.
5. Fine; such that a part of the fine can be used as compensation for the complainant.

The competent officer shall impose the penalty recommended by the Inquiry Committee within one week of the receipt of the recommendations of the Inquiry Committee. If the competent authority or the Board has a reason to doubt the fairness of the decision, they must express their concerns in writing and re-open the investigation.

After its imposition, the inquiry committee is to meet on regular basis and monitor the situation until they are satisfied that their recommendations have been implemented. In case the victim of harassment is in trauma, the organization shall arrange for counselling, medical treatment and additional medical leave as applicable. Compensation may also be offered to the complainant in case of loss of salary or other damages.

18.9. Appeal

In case any of the parties involved is not satisfied with the penalty awarded, an appeal may be filed with the relevant authorities.

19. CONFLICT OF INTEREST POLICY

19.1. Objective of Conflict of Interest Policy

Identifying and managing conflict of interest is central to shaping ethical culture in non-for-profit organizations such as TDEA. While TDEA recognizes the reality of people holding a wide range of legitimate interests outside the workplace, it is the duty of employees and all those associated with TDEA's work to ensure that these interests do not create a conflict of interest or a perception of a conflict of interest.

TDEA's Conflict of Interest (COI) Policy sets out guidelines on how to deal with such situations in order to protect its organizational interests /reputation and to prevent its work from being compromised as a result of familial or business connections of its employees and partners, ranging from donors, grantees and civil society organizations (CSOs). The aim and objective of this policy is to protect TDEA, its Board Members and its Employees from potentially damaging instance of impropriety arising from conflict of interest issues.

19.2. Scope

The COI Policy establishes guidelines and procedures regarding timely and proper disclosure of potential conflict of interest issues which an employee or other party working with TDEA may face in relation to the performance of job and discharge of responsibilities. This early disclosure is necessary to enable the management and Board to set in motion procedure to review conflict of interest issues on case-by-case basis in order to protect TDEA's reputation and institutional integrity.

While this policy is not intended to detail all situations giving rise to a potential conflict of interest, it is mandatory that each, real or perceived, conflict of interest issue is signposted to appropriate member of TDEA in the management chain as outlined in Section 19.3.1 for appropriate advice and required action in line with set procedure.

The COI Policy applies to TDEA's Board members, Sub-Committee members, CEO, Chief of Parties, Project Leads, directors, managers, specialists and other executives and officers of TDEA. The policy provides for specific disclosure and approval procedures to address situations where involvement of the above-mentioned TDEA members may give rise to potential conflict of interest.

19.3. Defining Conflict of Interest

For the purposes of this document, an 'interested person' is that person who is involved in a material or apparent conflict of interest situation. A conflict of interest arises when an individual's private interests compete with his/her professional obligations to an organization which results in the exercise of partial and biased judgment with potentially damaging consequences for the integrity and reputation of the organization.

This can arise when an individual's professional actions/decisions have the appearance of being influenced by considerations of personal financial gains. Thus conflict of interest can compromise an individual's ability to perform his/her duties and responsibilities objectively.

A conflict of interest depends on a situation which poses serious issue of ethics and impartiality in the exercise of decisions and judgments likely to be made by individuals concerned in such situations. Though it is very hard to avoid conflict of interest in certain settings, TDEA is committed to putting in place a policy of identifying and disclosing conflict of interest at the

earliest to manage such situations according to set procedures. If any employee is in any doubt about whether conflict of interest applies in a particular case, they should speak to immediate supervisor at the earliest.

19.3.1. Conflict of Interest Reporting Lines in TDEA's Hierarchy

Managers and employees below manager level report to the Director of the concerned department.

1. Directors report to the CEO.
2. The Chief of Party and Project Leads report to the Board through the CEO.
3. A member of the Board should declare any potential conflict of interest in the meeting of the Board with required quorum in attendance.

19.4. Annual Declaration of Interest

The declaration of interest applies not only to Members of the Board, Members of the Sub-Committees, Executive Director, CEO, Directors, Managers and Specialists but also to any other employee who can potentially influence TDEA's decisions. For example, this holds valid for employees charged with making procurement decisions, proposal vetting, and management decisions at any level, or those with access to proprietary information affecting the interests and reputation of TDEA.

The declaration of interest should be filed every year and should cover the fiscal period from July 1 to June 30 of the following year. The HR Unit should get all files updated within one month of the annual declaration, i.e., by July 31.

19.5. Interest to be Declared on a Case to Case Basis

Conflict of interest situation may arise for Members of the Board, Members of the Sub-Committees, Executive Director, CEO, Directors, Managers, Specialists and Officers of TDEA in relation to the following relationships:

19.5.1. Familial Relationship

1. Family members including an individual's spouse, siblings (whether of whole or half-blood), children (natural or adopted), parents, grandparents, spouses of siblings (i.e. brothers and sisters-in-law), children, grandchildren, great grandchildren, and any member living in the same home as the individual
2. Cousins including all blood relatives with whom an individual shares one or more common grandparents (other than those listed in point 1 above). The definition of cousin, for the purposes of this document, is restricted to "first cousin" as understood. The term covers children (natural or adopted) of the individual's parents' immediate families (i.e. siblings, whether of whole or half-blood) as well as the individual's parents' immediate families themselves (i.e. the individual's aunts and uncles).

19.5.2. Business Relationship

If an employee has shares in any of the following three business concerns, this constitutes conflict of interest and requires to be disclosed:

1. Persons/Firms/Companies receiving awards from TDEA.
2. Persons/Firms/Companies supplying goods and services to TDEA.
3. Persons/Firms/Companies from whom TDEA leases property and equipment.

19.5.3. Donors, Grantees and Member Organizations

Any familial and contractual relationship which carries potential conflict of interest implications should be disclosed.

19.6. Nature and Examples of a Conflict of Interest

A conflict of interest may arise in relation to any persons, firms or companies mentioned in Section 4. This might arise out of familial relationship with a person directly working with/for TDEA, or on other TDEA's programs which involve donors, grantees, sub-grantees and Member Organizations. It may also arise from a business relationship with organizations competing with TDEA for projects.

19.6.1. Familial Relationship

Having a family member or a cousin as defined in Section 19.5.1, of any TDEA member in a managerial or decision making position (e.g. Member of Board, CEO, Directors, Managers and Specialists), or in a key executive position within any organization that TDEA has a running program /or business dealings with.

19.6.2. Business Relationship

1. Owning stock, partnership share, owning a self-proprietor ship or other proprietary interests in a business that TDEA has a business relationship with.
2. Holding office, serving on the board, participating in management, or being otherwise employed with an organization that TDEA has running programs/business with.
3. Receiving remuneration for services from TDEA's competitors, grantees, vendors and business partners in an indirect capacity.
4. Receiving personal gifts or loans from third parties dealing or competing with TDEA.

19.7. Interpretation of this Statement of Policy

The situations and relationships which can give rise to a conflict of interest as listed in Sections 4 and 5 are by no means exhaustive. Therefore conflict of interest issue is likely to arise in others areas and relationships as well. It is expected that members of the Board, Member of the Sub-Committees, Executive Director, CEO, Directors, Managers, Specialists and Officers of TDEA shall be able to identify conflict of interest in areas and relationship not listed in the documents by drawing analogy with the listed areas and relationships.

When a conflict of interest appears to arise, it also means that it does not materially amount to conflict of interest. On the other hand, perceived conflict of interest issues may turn out to be an actual conflict of interest issue on disclosure of all material facts. However, it is TDEA's policy that in case of any perceived or actual conflict of interest as stated in Section 4, there shall be full disclosure before execution of any transaction.

It is incumbent on the Members of the Board, Member of the Sub-Committees, Executive Director, CEO, Directors, Managers, Specialists and Officers of TDEA to continually assess their transactions, business interests and relationships for potential conflict of interest and to make appropriate disclosures where conflict of interest is remotely perceived.

19.8. Disclosure Policy and Procedure

Members of the Board, Members of the Sub-Committees, Executive Director, CEO, Directors, Managers, Specialists and Officers of TDEA are mandatorily required to file annual declaration of interest by submitting Conflict of Interest Disclosure Forms (*attached as Annex No. 10-A and 10-B*). The disclosure declaration shall be governed by the following procedures:

1. All Members of the Board, Members of the Sub-Committees, Executive Director, CEO, Director, Managers, Specialists and officers of TDEA shall file in a declaration of interest form by July 31 of each year.
2. If new TDEA affiliations are formed that may have implications for conflict of interest issues, a declaration of interest highlighting the specific conflict of interest arising out of the new situation should be filed for immediate review.
3. All newly hired employees, from the CEO down to the Officer level, are required to file the Annual declaration of interest from within 30 days of appointment. All new appointees shall be briefed on, and provided with a copy, of the COI Policy by the HR and Administration Units.

19.8.1. Duty to Disclose

In case of any actual or potential conflict of interest issue arising, a fuller disclosure of financial interests or all facts material to the case should be made to the relevant reporting officer in TDEA hierarchy as listed in Section 19.3.1. More important, the employees and Board members of TDEA are required to thoroughly acquaint themselves with the COI Policy and certify in writing annually that they have read and understood it and that they undertake to fully comply with it.

TDEA also may provide copy of the COI Policy to outside parties and obtain from them a written commitment to comply where applicable. The outside parties for the purpose of this document include consultants, partners, sub-recipients, vendors and any other party defined as such by TDEA from time to time.

In case of gross violation of the COI Policy, disciplinary action shall be initiated which may result in termination in extreme cases. All employees' inquiries regarding any aspect of the COI Policy should be directed to the HR Unit.

19.9. Determining if a Conflict Exists

In case of a clear familial or business conflict of interest, the person shall declare the interest and remove him or her from the decision-making process. This shall be duly recorded in the minutes, note for record or other appropriate record-keeping documents.

In case of an ambiguity, the reporting officer in TDEA hierarchy shall bring the material or apparent conflict of interest issue before the CEO who shall then convene Conflict Resolution Committee (CRC), comprising a minimum of three members, for further consultation. The CRC shall be composed of the following members:

1. One member of the Board who shall Chair the committee.
2. TDEA's CEO.
3. One director from a program other than the one involved in conflict of interest issue.

In cases where nominated member of the committee may have conflict of interest and classified as the interested person, that member shall be replaced with another member from the Board. The CRC shall thus make a final determine whether a conflict is involved.

19.10. Procedures for Managing a Conflict of Interest

The best way to manage a conflict of interest is by removing the interested person from the decision making process. However, if CEO is the interested person, a member of the Board or interested person deems conflict of interest to be insignificant and/or the expertise of the person in question is critical to the process, then the following procedure should be followed:

1. The interest and person shall make presentation at the meeting of the CRC explaining why the conflict is insignificant. The presentation shall be followed by discussion and vote in the absence of the interested person to determine whether transaction triggering conflict of interest issue should go ahead.
2. The Chair (i.e. a Member of the Board or, if that Member of the Board is the interested party, another Member of the Board) of the committee shall, if appropriate, appoint a disinterested person or a committee to investigate alternatives to the proposed transaction or arrangement.
3. TDEA exercising due diligence, the CRC shall determine whether TDEA can obtain a more advantageous transaction or arrangement with reasonable efforts from a person or entity that would not trigger a conflict of interest.
4. In case a more advantageous transaction or arrangement is not reasonably obtainable under circumstances that would not give rise to a conflict of interest, the CRC shall determine by a majority vote of the disinterested members whether the transaction or arrangement is in TDEA's best interest and whether the transaction is fair and reasonable to TDEA.

The CRC shall make its decision as to whether to enter into a transaction or arrangement in conformity with such determination and minute the proceedings and decision in detail.

Transactions with parties with whom a conflicting interest exists maybe undertaken only if all of the following procedures are observed:

1. The conflict of interest is fully disclosed.
2. The interested with the conflict of interest is excluded from the approval process of such transaction. However, if the interested person's technical skill is deemed to be critical for the purpose of that transaction, then the CRC, on consultation among its members, may allow the person to take part in the discussion process. However, the interested person can never play a role in the approval process.
3. The transaction is not expressly prohibited by any applicable law or guidelines of the donor agencies of TDEA.
4. A competitive bid or comparable valuation exists.
5. The CRC has determined that the transaction is in the best interest of TDEA.

19.11. Violations of the Conflict of Interest Policy

This section applies to a situation where a conflict of interest was not disclosed by an interested person before the transaction took place. On discovery of the violation, the issue should be brought to the notice of the CRC.

If the Committee has a reasonable cause to believe that a person has failed to disclose actual or possible conflicts of interest, it shall inform the person of the basis for such belief and TDEA shall offer the person an opportunity to explain the alleged failure to disclose.

19.12. Recordings of Proceedings

The minutes of CRC meetings shall contain the following:

1. The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was involved present, and the Committee's decision as to whether a conflict of interest in fact existed
2. The names of the persons who participated in the discussion and vote relating to the transaction or arrangement, the content of the discussion, any alternatives to the proposed transaction or arrangement and a record of any votes taken in relation to the issue under discussion.

All paperwork related to the COI Policy and minutes of CRC meetings shall be maintained by the HR department in a separate cabinet. A copy of every individual's annual Conflict of Interest Declaration shall also be added to the individual files.

19.13. Avoiding Conflict of Interest

19.13.1. Disclose

It is essential to disclose any possible ethical breach or possible conflict of interest immediately. Disclosure should be made as soon as possible to ensure an early resolution without negative consequences at a later stage.

19.13.2. Comply and Circulate

It is the HR Unit's responsibility to circulate the COI Policy and ensure that it is read, understood and complied with as part of established institutional practices.

19.13.3. Be the Change You Want in Others

We learn from each other. One person working with integrity and ethically can act as a role model, exercise a profound influence on the colleagues, and work environment. Managers in particular are expected to set that one as to what is acceptable and what is not.

19.13.4. When in Doubt, Ask!

When unsure about whether a conflict of interest issues arises, TDEA staff can seek the advice of their reporting officer as listed in Section 19.3.1.

- When they are director or employee of a company, or a partner in or proprietor of a firm, that proposes to have any dealing with TDEA including but without limitation tendering for any contractor concession.
- All directorships which their immediate family members (spouse, any person with whom the employee is living in a regular union as if man and wife, child, parent, brother and sister), hold in the business of dealing in securities and derivatives.
- If to their knowledge, a member of their immediate family has any financial interest in any matter being considered by TDEA.

The employees who fail to make declaration of conflict of interests required under this Code shall be liable to account to TDEA for any profit made or benefit received from or in respect of the failure or violation. All declarations should be made in the Declaration of Conflict of

Interests Form to their Heads of Division/Department or the CEO and sent to the HR Unit for record.

20. WHISTLE-BLOWER POLICY

20.1. Commitment

TDEA believes in working with transparency, honesty and integrity in fulfilling its duties and responsibilities. It is not only committed to complying with all laws and regulations applicable in Pakistan, but also to promoting ethical behavior in its work and that of its partners, sub-recipients and communities.

The employees have an obligation to report financial impropriety, unethical behavior and noncompliance with applicable laws, regulations and TDEA policies. This policy provides guidance to TDEA and its project staff and outside parties on reporting suspicion or evidence of financial impropriety, unethical behavior and noncompliance with applicable laws, regulations or TDEA policies without fear of retribution.

20.1.1. Who Does this Policy Apply to?

This policy applies to everyone who carries out work for TDEA, including the following:

- Partner organizations.
- All TDEA staff and project staff.
- Staff of partner and member organizations working on TDEA/FAFEN projects.
- Contractors and sub-contractors.
- Consultants.
- Interns, volunteers, trainees, etc.
- Board members.

20.1.2. Reportable Activities and Behaviors

Some examples of 'Financial Impropriety' include the following:

- Theft of TDEA, donor, partner or sub-recipient funds,
- Unauthorized use of assets,
- Inaccurate effort reporting (i.e., via timesheets),
- Falsification of contracts or records,
- Conflict of interest and
- Other violations of laws, regulations or policies that could negatively affect TDEA and donor funds.

Some examples of 'Unethical Behavior' include the following:

- Dishonesty.
- Discrimination.
- Retaliation.
- Sabotage or vandalism.
- Sexual harassment.
- Disclosure of confidential information.
- Fighting and/or threatening violence.
- Failure to report injuries or policy violations.
- Violation of the Organization's Drug Free Workplace policy.
- Other behaviors that are in violation of TDEA's policies and procedures or not in the spirit of TDEA's Code of Business Ethics and Conduct.

Financial impropriety and unethical behavior also may constitute illegal acts depending on local laws, and donor regulations. Activities such as bribes and kickbacks, discrimination, sex trafficking and drunk driving are examples of acts that are not compliant with local laws and regulations. The employees must inform HR Unit of any conviction (other than minor traffic offences) that occurs during the time they are employed by TDEA.

20.1.3. Non-retaliation Policy

To protect employees, TDEA ensures that none of its staff shall discharge, demote, suspend, threaten, harass, or in any manner discriminate against an employee reporting in good faith within the scope of this whistle-blower policy. The employees are expected to exercise sound judgment to avoid baseless allegations. An employee who knowingly or recklessly makes an allegation or disclosure that proves to be unsubstantiated may be subject to disciplinary action, up to and including dismissal.

20.1.4. Anonymous Allegations

This policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously shall be explored appropriately, but consideration shall be given to the following:

- The seriousness of the issue raised.
- The credibility of the concern.
- The likelihood of confirming the allegation from attributable sources.

20.1.5. Procedure to Report Activities and Behavior

To support the whistle-blower Policy, TDEA has established procedures that shall ensure the proper receipt, retention and treatment of whistle-blower complaints or allegations. Whistle-blower reports are generally made in two ways:

1. Reported by the whistle-blower through internal reporting channels.
2. Entered by the whistle-blower directly into online reporting system.

20.2. Reporting through Internal Channels

Should an employee and or any associate become aware of, or concerned about, financial or other activity believed to be unethical, illegal, fraudulent, or not in compliance with TDEA's policies and procedures, he/she should report this activity to his/her immediate supervisor.

If the concern is related to his/her supervisor or the supervisor does not take appropriate action, an employee may report these concerns to a Human Resource Representative, Internal Audit supervisor.

The supervisors, managers, directors and others to whom reports are made must promptly convey these reports to the CEO. If CEO considers it appropriate he shall forward the concerns to Board. However, staff can also directly report any concerns to the Board.

20.3. Reporting Through Online System

In the event an employee is uncomfortable with reporting through internal TDEA channels, or is not satisfied with the response, the employee may report the activity using online reporting on TDEA website or via email. All reports made through online are confidential and may be made anonymously, at the choice of the reporter.

If the reporter's identity becomes known during the review process of the report, TDEA as an entity, TDEA management, recipients of the reports, auditors and investigators have a fiduciary duty to maintain the confidentiality of the identity of the reporter and of matters reported through online reporting to the extent possible, within the limitations of the law and policy, and the legitimate needs of the investigation. TDEA employee making the report has the same fiduciary duty and must keep whistle-blower matters confidential.

20.3.1. Dissemination of Incident Reports

It is important that all reports and allegations regarding Board Member are entered into online reporting system, regardless of the method of reporting. When the report of an incident or allegation is made via internal reporting channels, (e.g., through a supervisor), a designated Officer should enter the report into a system. This shall enable TDEA to have a complete database of all whistle-blower reports for tracking and record retention purposes.

If the allegation involves a Board member, access must be approved by the Chairperson. Access to incident reports involving the Chief Financial Officer or Director must be approved by the CEO; and the Head of the Internal Audit Committee should authorize access if the incident involves the CEO.

20.3.2. Investigation of Allegations

Disclosing information related to the investigation of a tip, whether reported anonymously or not, is a breach of confidentiality and may put the whistle-blower at risk. Inquiries and comments about an allegation should be made within the whistle-blower record. Care should be taken to limit emails and other correspondence to what is absolutely necessary and not to assert preliminary judgments about the case.

Conversations about a whistle-blower report should be documented and entered into record, including specific details sufficient to preserve a record of TDEA's treatment of the allegations and the case chronology. The First Responders committee is comprised of the initial recipients of the report. This committee is responsible for determining next steps. Preliminary steps include the following:

- Assigning who shall be the lead in terms of keeping the informed committee on progress.
- Identifying who shall take the lead on the investigation.
- Determining how to best preserve confidentiality and anonymity, if applicable.
- Identifying who, outside the investigation committee,, should be included in the correspondence and process.⁵⁷

Following this preliminary planning process, the committee and others authorized to participate shall develop and document the investigation plan This plan should consider the nature of the allegations (isolated incident vs. systemic), financial and reputational risk to TDEA, need for external assistance, level of personnel involved, potential interviewees, assignment of tasks to team members and others, the timeline for completion of tasks, and the internal communication protocols.

⁵⁷ Amended on 47th Meeting of Board of Trustees held on January 07, 2023. Repealed clause "*The First Responder committee shall be reformed every after one quarter.*"

It is important at this time for the team to assess, on a preliminary basis, the materiality of the alleged fraud, and whether it was allegedly perpetrated by exploiting a one-time, temporary gap in internal controls, or a systemic weakness that is present in other departments. If the allegation is material or indicates a potential systemic weakness, the team must determine if operations should be suspended or modified to reduce the risk of further loss.

20.4. Frequently Asked Questions

20.4.1. What is the Difference between Whistleblowing and Making a Complaint?

In practical terms, whistleblowing occurs when a staff member raises a concern about danger or illegality that affects others. The person blowing the whistle is usually not directly, personally affected by the danger or illegality. Consequently, the whistle-blower rarely has a personal interest in the outcome of any investigation into their concerns. As a result, the whistle-blower should not be expected to prove their case; rather he or she raises the concern so others can address it.

This is different from a complaint. When someone complains, they are saying that they have personally been poorly treated. This poor treatment could involve a breach of their individual employment rights or bullying and the complainant is seeking redress or justice for themselves. The person making the complaint therefore has a vested interest in the outcome of the complaint, and, for this reason, is expected to be able to prove their case.

20.4.2. What Information Should a Whistle-blower Provide?

You should state the facts with as much specific information as possible so that your allegations can be investigated. You should not speculate or draw conclusions, and should be prepared to be questioned further. The following are some basic questions you should answer to help describe the situation (these are for illustrative purposes only and may or may not be asked by the interviewer):

- Identify the person(s) engaged in the wrongdoing.
- Do you suspect that a supervisor or management is involved? Or do you know that a supervisor or management is involved?
- Is management aware of this problem?
- What is the nature of the wrongdoing?
- Where did this incident or violation occur?
- How long do you think this problem has been going on?
- How did you become aware of this violation or wrongdoing?
- Provide all details regarding the alleged violation, including the locations of witnesses and any other information that could be valuable in the evaluation and ultimate resolution of this situation.

Supporting evidence for the allegations, if available, is clearly helpful. However, TDEA does not require individuals to have evidence before reporting the matter, but it does say that the individual must reasonably believe the information is substantially true. Individuals should talk to someone in their service line or any other whom he/she feel convenience about their concern at the earliest opportunity rather than wait to collate any evidence.

20.4.3. What Happens after I File my Whistle-blower Report?

A preliminary investigation shall be conducted and you may be contacted with additional questions. The preliminary investigation shall determine if a full investigation should be undertaken and by whom.

20.4.4. Will I be informed of the Outcome of my Report?

You generally have the right to be informed of the disposition of your disclosure and the findings of any investigation, although there might be overriding legal or public interest reasons not to do so.

20.4.5. Can I Discuss the Matter with Friends and Colleagues?

If you self-disclose your identity, TDEA shall no longer be obligated to maintain your confidentiality. To protect your confidentiality and the confidentiality of the investigation, it is advisable not to discuss the matter with friends and colleagues.

21. HEALTH AND SAFETY

Health and safety of staff is an important concern of the organization and shall be protected to the maximum possible extent. Maintaining satisfactory health and safety standards require combined effort of the staff members, the administration and the senior managers. The Administration Officer has overall responsibility of the safety of staff while at work; similarly managers share the responsibility with regard to staff working under their control.

The guidelines for maintaining healthy and safe physical working environment have been presented in this section. The important guidelines shall be displayed as reminder at prominent places for continuing attention of staff members.

21.1. Guidelines for Staff Members

1. Take reasonable care of yourself, colleagues and others who may be affected by your actions.
2. Follow the instructions provided by the Administration Dept. related to work and use of equipment.
3. Report/share any health or safety concerns to the Administration or officer designated to look after health and safety matters.
4. Ensure that your work area is generally tidy and free from anything that could cause a slip, trip, fall, or collision.
5. Make sure that you deal with, or report, spilt liquids, torn carpets, trailing cables, and obstructions such as boxes, paper, bags/briefcases, etc.
6. Keep corridors, stairwells and emergency exits clear at all times.
7. Keep the cupboard doors and filing cabinet drawers close as they can cause injuries to others.
8. Prevent cabinets from toppling over by loading the bottom drawers first and by not overloading the top drawers. Always close one drawer before opening the next.
9. Ensure that all items are properly placed so that they do not topple over onto someone, or cause an obstruction or tripping hazard.
10. Never attempt to repair any electrical or electronic equipment, report any fault to the concerned person.
11. Last person leaving the room must switch off all the electric and gas appliances of work station like computers, lights, lamps, air-conditioners, heaters, etc.
12. In case of an injury, get proper first aid treatment from a (first aid) trained staff member.

21.2. Guidelines for Management

1. TDEA workspaces must have adequate and safe infrastructure, including air conditioning, adequate communication system, etc. The Administration Officer or the designated officer shall be responsible for the safety of the office infrastructure (furniture, computers and related equipment, electric wiring and extensions, communication equipment, etc.), office security, general cleanliness, and so on.
2. Work spaces shall be kept clean, hygienic and modestly designed to encourage staff motivation, productivity and interaction.
3. TDEA indoors (enclosed places) are strictly smoke-free.
4. TDEA shall take reasonable measures to make its office easily accessible to the disabled staff and visitors; other staff shall be expected to be sensitive to the needs

of such individuals and any reasonable special arrangement needed for such staff shall be provided.

5. Fire extinguishers shall be prominently displayed and staff shall be well trained in their use. Fire drills shall be conducted periodically as determined by the Security Unit.
6. Emergency exit signs shall be displayed as appropriate. The Administration Dept. shall prepare and update the emergency plan and periodically share it with the staff.
7. TDEA vehicles shall be maintained for efficiency and safety; during vehicular travel. The staff must use adequate safety precautions such as seat belts, following speed limits, taking appropriate rest while driving, etc.
8. TDEA Office shall maintain a first-aid kit and a satisfactory number of staff to be able to provide first aid.
9. Emergency phone numbers including: police, fire brigade, ambulance etc. shall be appropriately displayed near the phones.

22. CODE OF ETHICS⁵⁸

22.1. Applicability of Code

The Code of Ethics and Conduct set forth below and henceforth referred to as “the Code” is applicable to the following:

- All the activities of TDEA. This Code covers all employees, officers, consultants, member organizations and Board of TDEA.
- TDEA and all affiliates, partnerships, and other organizations over which TDEA has control or significant influence.
- All the projects being implemented by TDEA.

22.2. Using the Code

- Read through the entire Code (*Acknowledgment of Code of Ethics and Conduct attached as Annex No. 30*).
- Think about how the Code applies to your job, and consider how you might handle situations to avoid.
- Improper, illegal or unethical actions.
- If you have questions, ask your supervisor/manager or contact other resources.

22.3. Vision

A democratic and just society that guarantees rights, respect and dignity of all individuals.

22.4. Mission Statement of TDEA

TDEA strives to strengthen public accountabilities by enhancing capability of citizens' associations to work for civil liberties, improved governance, democracy and peace in Pakistan.

22.5. Key Principles and Core Values of TDEA

TDEA upholds the following key principles and core values in the performance of its work, public interactions, and organizational procedures and process:

- *Inclusion*: TDEA/FAFEN believes in inclusion as the basis for strengthening democratization, and therefore, encourages greater participation of all stakeholders particularly the marginalized in its work.
- *Integration*: TDEA/FAFEN believes in partnerships and networks as critical in integrating and strengthening voices of citizens and their associations for civil liberties, improved governance, democracy and peace in Pakistan.
- *Neutrality*: TDEA/FAFEN does not support any political party.
- *Transparency*: TDEA/FAFEN procedures and processes maximize organizational transparency.
- *Accountability*: TDEA/FAFEN is open to public accountability of its governance, work, performance and conduct.
- *Commitment to Democracy*: TDEA/FAFEN practices democratic decision-making processes in its management and programs.

⁵⁸ Added Clause in Seventeenth Meeting of the Board of Trustees: Resolution No. bot17-10/2014-05
Effective Date: October 22, 2014.

- *Rule of Law:* TDEA/FAFEN adheres to the all provisions in the constitution, law, rules and regulations in vogue in the country that are not in violation of civil and political liberties.
- *Objectivity:* TDEA/FAFEN gives primacy to robust methodologies and information based on facts and/or credible research and evidence as a cornerstone to its processes, programming, public positions and advocacy.
- *Non-Discrimination:* TDEA does not discriminate and condone discrimination on the basis of caste, color, ethnicity, creed, gender, religion, political, geographical or linguistic background, marital status, sexual orientation, age or physical disability, etc.
- *Best Practices:* TDEA enhances its organizational competence by incorporating best program and management practices and standards.

22.6. Code of Ethics and Conduct

The Code is meant for all the personnel of TDEA to ensure high standards and makes it clear how potential conflicts of interests are dealt with. The Code is not intended to address very specific legal or ethical situation. Rather, persons covered by this code are expected to adhere to it and to all the policies and procedures of TDEA, including those referred in the HR, Procurement, Finance, Grants, Internal Audit, Network, and other manuals of TDEA, by using common sense and good judgment, asking questions, and seeking guidance. TDEA expects all its personnel to understand and comply with this code at all times in carrying out their duties.

TDEA personnel who deal with contracts and grants are responsible for knowing and complying with all applicable laws, regulations, standards, and contractual obligations, even when they are not specifically addressed in the Code. They can also request senior management to solicit legal advice on certain matters which are complicated and/or require professional judgment beyond their expertise.

Because violations of certain requirements can result in the imposition of significant civil or criminal penalties to TDEA or the person involved, strict adherence to these applicable requirements and the Code is essential. In the event an employee violates the standards outlined in the Code, TDEA shall determine the appropriate action to be taken. The employees are required at the time of employment to certify that they have reviewed the Code of Ethics and Conduct and update the certification annually.⁵⁹

22.6.1. Make Ethical Decisions

Ethical decision making is essential to the success of our organization. Some decisions are obvious and easy to make; others are not. For all of us at TDEA, the manner in which we approach our work is just as important as the outcomes we seek to achieve. We work at TDEA because our internal compass leads us to do what is right.

That same internal compass must guide us to meet the highest ethical standards in all of our operations and interactions. If you are confronted with a situation that causes you concern, ask yourself the following questions:

- Would you want your supervisor or colleagues to know?
- How would you feel if your actions were published in the newspaper, broadcast on the radio, or posted on the internet?

⁵⁹ Effective date of implementation: March 18, 2017.

- How would you explain your actions to an auditor, investigator, or member of the law enforcement agency?
- Would you be proud to tell your parents, your spouse, or your children?

No code of conduct can anticipate each and every situation you may confront in your work, but your conviction to do what is right, combined with the guidance set forth in this code, shall serve you well in your work at TDEA. If you are uncertain about the proper course of action in any situation, you should consult the Code of Ethics and Conduct as well as your colleagues. Don't forget that you are surrounded by dedicated colleagues who are also called on to do what is right.

22.6.2. Abide by the Law

Regardless of local practices, we have rules for how to use funding appropriately. TDEA strives to represent the best professional practices in accordance with applicable laws.

22.6.2.1. Treat Others with Dignity and Respect

TDEA is committed to providing a work environment that promotes equal opportunity, dignity and respect. Our policies promote equal employment opportunities for all persons regardless of race, color, religion, gender, age, marital status, sexual orientation, national origin, citizenship status, disability, veteran status, genetic information or any other legally protected status.

Equal opportunity extends to all aspects of the employment relationship, including hiring, transfers, promotions, training, terminations, working conditions, compensation, benefits and other terms of employment. TDEA strives to keep the workplace free from all forms of harassment, including sexual harassment. TDEA considers harassment in any form to be a serious offense. Employees should familiarize themselves with TDEA's Sexual Harassment Policy, which can be found in the HR Manual.

Employees who believe they have been discriminated against or harassed should immediately report the incident to their supervisor or refer the case to committees designed for the said purposes. The supervisors or employees found to have engaged in discriminatory conduct or harassment are subject to immediate disciplinary action, including possible termination of employment.

22.6.2.2. Prevent Workplace Violence and Harassment

TDEA strictly prohibits actual or threatened violence against co-workers, visitors, program participants or anyone else who is either on our premises or has contact with employees in the course of their duties.⁶⁰ We expect that all relationships among persons in the workplace shall be professional and free of bias, harassment and violence. Every threat of violence is serious. We must report any such event immediately. Threats of immediate concern should be referred to the IDC. Other threats must be brought to the attention of designated security focal persons of TDEA.

22.6.2.3. Protect Children's Rights

TDEA affirms its commitment to children's rights and safety by clearly stating that the organization:

⁶⁰ Effective date of implementation: March 18, 2017.

- Has zero tolerance for exploitation and abuse of children in any form.
- Prohibits child labour by any of its employees, partners, sub-contractors, suppliers and vendors.

22.6.2.4. *Disability Policy*⁶¹

TDEA believes people with disabilities are part of human diversity and views disability in terms of attitudinal and physical barriers that render people disabled and not their impairments. In other words, if access barriers are removed, people with disabilities can become functionally active and productive citizens.

TDEA's Disability Policy seeks to remove access barriers at the work place faced by its disabled employees as well as seeks to bridge gaps between the initiatives of rights based disabled persons organizations and the mainstream CSOs. In this context, TDEA shall ensure the following:

1. Instead of classifying the disabled as one single homogenous group, TDEA shall include the following sentences in all its job postings: Physically disabled/wheel chair users, the blind/visually impaired, speech and hearing impaired and/or persons with any other disabilities who otherwise qualify for the position are encouraged to apply. TDEA provides accessible work environment to its disabled employees through reasonable accommodations without compromising on the quality of work.
2. TDEA shall ensure that its office building is accessible.
3. TDEA shall procure for its employees with disabilities software/gadgets to meet their special needs in performing their official tasks.
4. Input of persons with disability shall be sought and considered in the allocation of work stations.
5. TDEA shall arrange periodic trainings to sensitize its employees on disability issues.
6. TDEA shall consider mainstreaming disability issues for all its programing
7. TDEA shall ensure that long-term disability benefits are available to its contractual employees as part of their life and accidental insurance plan. However, such arrangement shall be made when the funds are available (reference 10.10.2 Long term disability benefits).

22.6.2.5. *Political Activities*

Employees may not directly or indirectly use any TDEA's funds, property, assets, services, or facilities to participate or intervene in any political campaign on behalf of, or in opposition to, any candidate for public office, or to contribute to any political party, campaign, political action committee, or public office - holder. Network manual for member organizations and Board also provide specific guidance in this regard.

22.6.2.6. *Charitable Contributions*

While TDEA personnel are free to support private charities on their own time with their own resources, TDEA personnel are prohibited from making any corporate charitable donation in the form of funds, complimentary facilities, or services of any kind without the express written approval of the CEO who shall base any such approval considering the amount, timing, and means of the charitable contribution. Some donors do not allow charitable contributions to be charged to their funds and hence, due care needs to be exercised.

⁶¹ Added Clause in Twenty Sixth Meeting of the Board of Trustees: Resolution No. bot26-11/17-01
Effective Date of implementation: November 17, 2017.

22.6.2.7. Alcohol and Drug-Free Workplace

It is TDEA's policy to maintain an alcohol and drug-free work place. It is unlawful to distribute, dispense, possess, or use a controlled substance at any TDEA facility. For the purposes of this provision, controlled substances include the following:

- Illegal drugs and narcotics.
- Prescription drugs obtained or used without a legal prescription.
- Other unlawful substances or materials.

Failure to comply with this policy shall result in TDEA taking appropriate action against the employee, up to and including termination.

22.6.2.8. No Bribes or Kickbacks

TDEA prohibits any activity that could be perceived as an attempt to improperly influence, obtain, or reward favorable treatment in connection with any funded agreement. This prohibition includes bribery of government officials or offering or receiving kickbacks from contractors, subcontractors, grantees, vendors etc.

TDEA employees are prohibited from providing, attempting to provide, offering directly or indirectly, or accepting, any money, fee, commission, credit, gift, thing of value, or compensation of any kind to any government official, the contractor or its employees, or a subcontractor or its employees for the purpose of improperly obtaining or rewarding favorable treatment in connection with any contract, grant, cooperative agreement, subcontract, sub grant, or any other occupational dealing.

22.6.2.9. Proprietary Information

It is important that we respect the property rights of others. TDEA strictly prohibits acquiring or seeking to acquire improper means of a competitor's secrets or other proprietary or confidential information. We shall not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property of others.

22.6.3. Comply with Donor Requirements

We are committed to our donors, and the society we serve. This commitment, along with our compliance with TDEA's policy manual and adherence to this code, ensures that we provide need driven and effective services to our donors and beneficiaries.

22.6.3.1. Know Agreement Requirements

All project staff members are required to read and understand the award agreements and any modifications. All project managers must know what costs are allowable and appropriate under their awards. Staff should be particularly attentive to applicable programmatic and administrative requirements for the following:

- Logical/Results framework.
- Program implementation plan.
- Monitoring and evaluation plan.
- Geographical area of project implementation.
- Reporting deadlines.
- Equipment and vehicle purchases or leases.
- Source and origin of goods and services, if applicable.

- Competition and minimum bids.
- Ineligible and restricted commodities such as pharmaceuticals and fertilizer (for United States Government funds).
- Property management and inventory control.
- Subcontract and contract provisions, approvals, and advances reporting.

22.6.4. Work Responsibly!

22.6.4.1. No Conflicts of Interest

TDEA has many donors, suppliers, other implementation and facilitating partners, and beneficiaries, all of whom are important to our success. All of these relationships must be based entirely on fair dealing. Professional courtesies can build organizational reputation, but they can also create a perception of conflict of interest that can undermine the integrity of our relationships. All persons covered by this Code are required to avoid actions that create actual or potential conflicts of interest. In addition, all persons covered by this Code are required to report any conflicts of interest that arise and are in any way connected to TDEA.

What constitutes a conflict of interest or an unethical work practice? This is both a moral and legal question, and it is therefore not possible to define all the various circumstances and relationships that would be considered unethical. TDEA has the conflicts of interest policy in place which describes in detail the specific situations which results into conflicts of interest and the reporting mechanism for individuals having any actual or potential conflicts of interest connected to TDEA. All the personnel must read carefully and understand the COI Policy of TDEA to avoid any consequences resulting from noncompliance to the policy.

22.6.4.2. Don't Compete with TDEA

Employees must not take for themselves personally, or direct to a third party, a business opportunity discovered while carrying out duties and responsibilities for TDEA, unless TDEA is first offered the opportunity and turns it down. Employees must also not use any TDEA property or information learned in the course of employment at TDEA to compete with TDEA to its detriment.

22.6.4.3. Maintain a Duty of Loyalty

TDEA strives to embody the highest standards of ethical behavior, and is committed to act at all times in a manner consistent with applicable laws and regulations. Employee loyalty to TDEA and its goals is integral to TDEA's success. In acting on these principles, employees of TDEA are expected to maintain exemplary integrity and ethical standards, to comply with all applicable laws and regulations, and to refrain from advancing any personal interests that conflict with those of TDEA.

The employees are expected to devote their full working time, attention, and energies to their jobs. Because of the nature of TDEA's work, employees may also be required to travel or be available at times outside regular work hours to fulfil their professional obligations.

Employees must notify the Human resource unit before accepting a significant leadership position, including board membership, in another organization, whether or not the position includes compensation. Employees and others who make or are involved in procurement decisions are also required to declare their existing conflicts of interest at least on an annual basis or less frequently as determined by TDEA.

22.6.4.4. Maintain Accurate Records and Produce Reliable Internal/External Information

Accurate and reliable financial records are of critical importance in meeting TDEA's financial, legal, and contractual obligations. TDEA's financial books, records, and statements shall properly document all assets and liabilities and accurately reflect all transactions of TDEA. No false entries shall be made on TDEA's books or records for any reason.

The employees must ensure that documentation and records are developed and maintained carefully and accurately in accordance with all applicable legal requirements and TDEA's internal procedures, and that TDEA funds are meticulously expended and accounted for. The employees must not submit data that is in any way inaccurate, incomplete, or misleading, when reporting data of any kind, whether internally or to an existing or potential donor or any subcontractor. Likewise, they may not falsify, alter, or distort information to be submitted.

This includes time sheets or other time records, cost reports, expense reports, pricing proposals, certifications relating to cost or pricing data, or requests for payment. Falsification includes changing a document after it has been signed or otherwise completed, unless the responsible counterpart has agreed to the changes, and the agreement to the changes is properly noted on the document. In particular, when you sign a timecard or other labour documentation, either manually or by reporting electronically, you are certifying that the timecard or electronically reported time accurately reflects how your time was utilized at work.

The employees charging to funded agreements must be particularly careful to ensure that hours worked and cost expended are allocated to the account for which the work and costs were incurred. Improper shifting of costs from one contract to another, improper charging of non-contractual time to contracts, improper charging of labour or materials, and the falsifying of time are strictly prohibited.

A cost may not be charged or allocated to a government contract if the cost is unallowable by regulations or contract provisions, or is otherwise improper. Intentional or careless false reporting or mischarging shall result in discipline up to and including termination.

An individual who manipulates charges to a contract may be subject to criminal charges and place TDEA in peril of investigation and prosecution including fines, penalties, suspension, and debarment. Documents related in any way to an on-going or potential investigation of TDEA by a government agency or any other official proceeding must not be destroyed, discarded, or altered.

22.6.4.5. Cooperate with Officials and Auditors

TDEA employees are expected to cooperate with all government or donor/client officials and auditors fulfilling their oversight responsibilities for the financial reporting process, the system of internal control, the audit process, and the organization's process for monitoring compliance with laws and regulations and the Code of Conduct.

22.6.4.6. Don't Give Gifts to Government Officials

TDEA strictly prohibits any activity that could be perceived as an attempt to improperly influence, obtain, or reward favorable treatment from government employees by providing anything of value to government employee, even if there is no intent to influence an official government action or decision. Consistent with this Code's prohibition on bribes and kickbacks, and other national anti-corruption laws, restriction of gifts to government officials may apply.

22.6.4.7. Don't take Personal Gifts from Suppliers, Subcontractors, Grantees or Beneficiaries

TDEA has adopted a zero tolerance policy on gifts and therefore, it is of overriding importance that procurement personnel should not be placed in a position where their actions may constitute or could be reasonably perceived as reflecting favorable treatment of an individual or entity by accepting offers of gifts, hospitality or other similar favors. Personnel should at all-time behave in a way that upholds the values, integrity and good reputation of TDEA and that never gives the impression of impropriety.

Because of TDEA's zero tolerance policy regarding acceptance of gifts and hospitality, procurement or other personnel involved in any aspect of procurement are prohibited from accepting any gift including drinks, meals, tickets, hospitality, transportation, or any other form of benefits, even if it is in connection with an official working visit, from any person who would not have made the gift or provided hospitality if the personnel had not been working for TDEA regardless of the value and of whether the outside source is or is not soliciting business with the organization.

Exceptions to this rule are invitations to lunches, dinners, receptions, etc., from governments, funding sources, or other partner organizations that may be accepted when such invitations are part of TDEA personnel's official functions and in normal course of business. All items received from vendors, subcontractor, grantees or beneficiaries, even of nominal value, shall be reported to the HR Unit and returned to the vendor, subcontractor, grantee or beneficiary.

TDEA's policy is generally to refuse to receive any gift that is more than nominal in value, or is given for the purpose of influencing an official TDEA duty. If an employee receives a gift more than nominal in value under circumstances where returning the gift or offering to pay for it may be an affront to the giver, the employee should report the gift immediately to his/her supervisor. TDEA management shall determine the appropriate disposition for any such gift.

22.6.4.8. Compliance by Vendors, Grantees, Subcontractors and Consultants

All vendors, grantees, subcontractors and consultants working with TDEA are expressly required to comply with all applicable laws, regulations, standards, and contractual obligations applicable to our work. Each such contract with a subcontractor, grantee or consultant shall also provide for the termination of the contract in the event the subcontractor, grantee or consultant violates applicable laws, regulations, standards, contractual obligations.

The following is the code of conduct of TDEA for vendors, grantees, subcontractors and consultants;

1. They must uphold the human rights of workers, and treat them with dignity and respect as understood by the international community.
2. They shall not discriminate against any worker based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status in hiring and employment practices.
3. They must be committed to a workplace free of harassment. Suppliers shall not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion and verbal abuse.
4. They shall not use any form of forced, bonded, indentured, or prison labour. All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice.

5. Child labour is strictly prohibited. They shall not employ any children.
6. Under no circumstances the workweek shall exceed the maximum permitted under applicable laws and regulations in Pakistan. They must offer vacation time, leave periods, and holidays consistent with applicable laws and regulations in Pakistan.
7. They must pay all workers at least the minimum wage required by applicable laws and regulations of Pakistan and provide all legally mandated benefits.
8. They must respect the right of workers to associate freely, form and join workers organizations of their own choosing, seek representation, and bargain collectively, as permitted by and in accordance with applicable laws and regulations of Pakistan.
9. They must be committed to creating safe working conditions and a healthy work environment for all of their workers.
10. They must be committed to reducing the environmental impact of their designs, manufacturing processes, and waste emissions.
11. They must be committed to the highest standards of ethical conduct when dealing with workers, suppliers, and customers.
12. Corruption, extortion, and embezzlement, in any form, are strictly prohibited. Suppliers, grantees, subcontractors or consultants shall not engage in corruption, extortion or embezzlement in any form and violations of this prohibition may result in immediate termination of services and in legal action.
13. They must disclose information regarding their business activities, structure, financial situation, and performance in accordance with applicable laws and regulations and prevailing industry practices.
14. They shall not offer or accept bribes or other means of obtaining undue or improper advantage.
15. They must uphold fair business standards in advertising, sales, and competition.
16. They are encouraged to engage the community to help foster social and economic development and to contribute to the sustainability of the communities in which they operate.
17. They must respect intellectual property rights, safeguard customer information, and transfer of technology and know-how must be done in a manner that protects intellectual property rights.
18. They must adopt or establish a management system designed to ensure compliance with this Code and applicable laws and regulations in Pakistan.

22.6.5. Protect the Reputation and Assets of your Organization

22.6.5.1. Confidential and Material Non-Public Information

Confidential information generated and gathered in the course of our programmatic and operational activities is a valuable asset. Protecting this information is critical to our reputation for integrity and our relationship with donors and partner organizations, and ensures compliance with applicable laws. All confidential information, regardless of its form or format, must be protected from the time of its creation or receipt until its authorized disposal.

Confidential information is information that you create, develop, receive, use or learn in the course of your employment with, or service as a director or officer of TDEA. It includes information that is not generally known by the public about TDEA our affiliates, our employees, our donors or other parties with whom we and our affiliates have a relationship and who have an expectation of confidentiality. This also includes information about employees, operations,

programs, products, services, strategies, research, policies, systems, budgets, proposals, finances, plans, and donor relationships.

TDEA personnel must protect the proprietary information of TDEA and its affiliates against improper release or disclosure. This requirement extends to protecting sensitive and private information of TDEA employees. During and after their employment at TDEA, employees must refrain from disclosing any confidential or proprietary information to anyone outside TDEA, except as authorized by the board, or as required by law.

Furthermore, employees must not, without prior authorization from CEO/COP, publish any writing, participate in any published interview, or make any public speech or other statement that provides information about or otherwise reflects on TDEA or its relationship with any donor or implementing partner. TDEA does not solicit nor shall it receive any sensitive proprietary internal government information, including budgetary or program information, before it is available through normal processes.

22.6.5.2. Intellectual Property

Any work produced in the course of employment at TDEA is the exclusive property of TDEA. As a condition of employment, TDEA employees waive any rights – including intellectual property rights to such work products, and may not produce, distribute, or make any other use of such work products outside TDEA without written authorization from the management of TDEA. Employees should take all available steps to protect TDEA's intellectual property. Any work developed, designed, or authored by TDEA or any of its personnel and authorized for external distribution, including any websites or material posted on the internet, should bear a copyright notice on it.

TDEA employees should avoid the unauthorized use of copyrighted materials of others, including material which may be readily available without charge on the internet. Employees should consult with the management if there is a question about the permissibility of photo copying, excerpting, displaying, disseminating, electronically copying, transmitting, or otherwise using copyrighted materials.

Similarly, using the trademark or service mark of another organization, even one with which TDEA has an official relationship, always requires prior approval by the concerned authorities. The employees are expected to comply with license agreements that govern the use of software created and copyrighted by companies other than TDEA. Reproducing or installing software without authorization may violate these agreements and be illegal.

22.6.5.3. TDEA Assets

TDEA assets, which include information technology, office supplies, equipment, furniture, vehicles, and work space, are provided to TDEA personnel in furtherance of TDEA's operations. TDEA personnel are responsible for safeguarding these assets and ensuring they are used appropriately.

Using TDEA assets for viewing or sending pornography; gambling; violating copyright or trademarks; solicitation; or distribution activities that are not related to an employee's duties; or for any purpose other than TDEA's work (except for limited, necessary personal communications, or as specifically authorized by TDEA) is prohibited.

Any person found to be engaging in or attempting theft or other improper use or diversion of TDEA property, including physical assets, funds, documents, intellectual property, personal

property of other employees, or any other item of value, shall be subject to immediate discharge and possible criminal proceedings.

22.6.5.4. Communication with the Public

In internal or external communication, there shall be no material omissions or exaggerations of fact, no use of misleading photographs, nor any other communication that would tend to create a false impression about or misunderstanding of TDEA. The Code prohibits TDEA personnel from disclosing any information, confidential or not, outside of appropriate work channels. Any disclosure of organizational information through social media networks, on-line chat rooms, on websites, or in blogs may be restricted.

22.7. Implementation

TDEA's Compliance Program is intended to ensure that the organization:

- Follows internal policies.
- Complies with external regulations and statutes.
- Provides training and to staff regarding the Code of Ethics and Conduct.

22.7.1. Non-Retaliation

TDEA shall not tolerate retaliation against anyone, who in good faith makes a report of a violation or suspected violation under this code or any other policy of TDEA. Any such retaliation would be considered as serious violation of this code and grounds for immediate corrective action. Such action may include termination of employment. Allegations of retaliation shall be investigated immediately and, if substantiated, shall result in appropriate disciplinary action.

22.7.2. Consequences for Failure to Comply

The matters addressed in TDEA's Code are of utmost importance to the organization and compliance with the requirements contained herein is essential to its ability to accomplish objectives in accordance with the law and stated values. Accordingly, it is expected that all TDEA's staff members strictly adhere to it in performing their duties. In addition to avoiding improprieties, employees must also avoid the appearance of impropriety or any action that might misrepresent to employees and partners of TDEA that improper behavior is condoned.

The nature of offence (major or minor) shall be decided by the relevant authority, taking into account the gravity of misconduct, previous record of the staff member, and any other circumstances that may exist at the time of misconduct. TDEA shall take appropriate action against any employee whose actions are found to violate the code. Such action may include immediate termination of employment at TDEA's discretion. In addition, where TDEA has suffered a loss as the result of an employee's violation of the code, TDEA may pursue any available remedies against the employee responsible.

23. POLICY FOR COMBATING TRAFFICKING OF PERSONS

The Board, in its Twenty-Seventh meeting held on February 24, 2018, approved the Policy for Combating Trafficking of Persons as a passed through policy of USAID (*attached as Annex No. 31 and Annex No. 32*).⁶²

⁶² Added Clause in Twenty-Seventh Meeting of the Board of Trustees: Resolution No. bot27-02/18-01
Effective date of implementation: February 24, 2018.

24. TDEA ANTI-FRAUD & ANTI CORRUPTION POLICY⁶³

24.1. Introduction

TDEA is committed to the highest standards of governance, fiduciary duty, responsibility and ethical behavior. Fraud, bribery, and corruption go against TDEA's Guiding Principles of Accountability, Transparency, Best Practices, Neutrality, and Integrity; diminish TDEA impact, undermine the viability of the organization, and breach the trust placed in TDEA by donors, clients and other stakeholders.

Any act of fraud and corruption in TDEA's activities depletes funds, assets and other resources necessary to fulfill TDEA's mandate. Fraudulent and corrupt practices can also seriously damage TDEA's reputation and diminish donors' trust in its ability to deliver results in an accountable and transparent manner. Furthermore, it may affect staff and personnel effectiveness, motivation and morale, and impact on the Organization's ability to attract and retain a talented work force.

TDEA complies with applicable legislations and other regulatory requirements pertaining to fraud, bribery, and corruption. Its Trustees are required under the law to safeguard the assets of the Trust.

This policy sets out the minimum standards and procedures that TDEA is obliged to follow.

This policy addresses the awareness, prevention, identification, reporting, investigation and closeout of fraud and corruption cases at TDEA. Where the donor regulations are more restrictive, those regulations must be complied with and incorporated in our work.

24.1.2. Policy Statement, Scope and Application

TDEA has **zero** tolerance policy towards fraud, bribery, corruption, and other forms of dishonesty in its programs and operations. This policy and its related procedures apply to all 'responsible parties' who carries out work for TDEA, including but not limited to the following:

- Partner organizations.
- All TDEA staff, project staff and non-staff personnel.
- Staff of partner and member organizations working on TDEA/FAFEN projects and programs.
- Contractors, sub-contractors, vending agencies and companies.
- Implementing partners (Implementing partners and responsible parties engaged/contracted by TDEA)
- Consultants.
- Interns, volunteers, trainees, etc.
- Board members.

This policy places the ultimate responsibility for managing fraud, bribery and corruption at the TDEA's senior level management and Board level. TDEA is committed to preventing, identifying and addressing all acts of fraud and corruption within TDEA, through raising awareness of fraud risks, implementing controls aimed at preventing and detecting fraud and corruption, and enforcing this policy.

All incidents of fraud and corruption are to be reported, and will be assessed and, as appropriate, investigated in accordance with the guidelines of the TDEA's Policy Framework for addressing a non-compliance with TDEA's policy, when applicable. TDEA will pursue rigorously to take disciplinary and other actions against perpetrators of fraud, including recovery of financial loss suffered by TDEA.

⁶³ Anti-Fraud and Anti-Corruption Policy approved in 35th Board Meeting held on June 20, 2020.

24.1.3. Definitions and examples

For the purpose of this policy, the following definitions will apply:

- **Fraud** – Any act or omission that intentionally misleads, or attempts to mislead, another party in order to obtain a financial or other benefit or to avoid an obligation.
- **Bribery** – Giving, paying, promising, offering, or authorizing the payment of anything of value to any party to influence any person or entity to act improperly.
- **Corruption** – The use or abuse of one's authority or position within TDEA for private gain.

Relevant clauses of TDEA's Code of Ethics and Conduct will apply to constitute a fraud, bribery or corruption including any unlawful or intentional conduct that fall under fraud or corruption.

24.2. Compliance with Applicable Laws and Regulations

It is TDEA's Policy to comply with all applicable laws pertaining to fraud, bribery, and corruption and relevant donor requirements pertaining to fraud reporting and investigations. In the event of any perceived difference between the requirements of this Policy and any legal requirement, TDEA will always act in accordance with the highest applicable standards.

24.3 Prevention and Detection of Fraud, Bribery and Corruption

24.3.1 Fraud Awareness

Staff members, contractors, sub-contractors, consultants, vendors, implementing partners and all responsible parties must be aware of their responsibility to prevent fraud and corruption. In this regard, managers are to raise awareness of this Policy, and reiterate the duty of all staff members to report instances of fraud and corruption, as required by the TDEA Policies & Procedures and TDEA Code of Ethics. Managers are also required to make non-staff personnel, vendors, implementing partners and responsible parties contracted/engaged by their respective projects, aware of this Policy. This may include, but not limited to sharing the Anti-Fraud & Corruption Policy and seeking their acknowledgement before signing of the contract, etc.

Vendors, consultants, contractors, subcontractor, implementing partners are to be made aware of and accept that they are subject to the TDEA Anti-fraud & Corruption Policy. TDEA will make sure to pass on this policy to the relevant parties while they are entering into any legal contract with TDEA.

24.3.2 Building Fraud Prevention Into Program And Project Design

When developing a new program or project, it is important to ensure that fraud risks are fully considered in the program/project design and processes. This is especially important for high risk programs/projects, such as those that are complex or operate in high risk environments. These program/project risk logs shall be communicated to relevant stakeholders, including donors, implementing partners and responsible parties, together with an assessment of the extent to which risks can be mitigated.

Program and Project Managers are responsible for ensuring that the risk of fraud and corruption is identified during the program/project design phase. They are to consider how easily fraudulent acts might occur and be replicated in the day-to-day operations. They are also to evaluate their impact, and the effectiveness of the measures taken to mitigate risks, including systemic monitoring actions. Informed decisions can be made on additional mitigating actions.

24.3.3 Management of the Risk of Fraud and Corruption

Managers shall identify and assess the risks in their program or project areas, including the risk of fraud and corruption, and apply mitigating measures, taking due account of the level of risk involved. Because it is impossible to eliminate all risks, good risk management requires a sound balance of the following aspects:

- Assessment
- Mitigation
- Transfer or acceptance of risks

These risks shall be communicated to relevant stakeholders, together with an assessment of the extent to which risks can be mitigated.

Managers shall be vigilant in monitoring irregularities and the risk of fraud. Where managers are concerned about the level of fraud risk within a program, project, or management services agreement activity, they may consult to their respective Director or Director Operations for the consideration as to whether a proactive investigation is justified. Proactive investigations aim to identify and control an existing (but yet unidentified) risk of fraud or financial irregularity.

24.3.4 Fraud risk assessment

Where a high risk of fraud has been identified within the general risk assessment of program/projects, an additional and specific fraud risk assessment may be necessary. This in-depth assessment should be used to better identify fraud risks and develop effective measures that address these high risks. The aim is to help management to identify and evaluate areas of the program/project that are most susceptible to fraud, and prioritize where TDEA should focus its resources for fraud prevention and mitigation.

These fraud prevention and mitigation measures should be monitored for effectiveness over time, and the fraud risk assessment process may be repeated periodically utilizing lessons learned, especially for longer-duration programs/projects or where material changes are made to the design of the program/project during its implementation.

24.3.5 Internal control system

A strong internal control system, where policies and procedures are enforced, internal controls are appropriately implemented, and staff members, non-staff personnel, Consultants, contractors, sub-contractors, vendors, implementing partners and responsible parties are informed about fraud and corruption and its consequences, can curtail fraud and corruption.

24.3.6 Seeking Guidance about the Policy

Director Operations oversee and manages TDEA's anti-fraud and anti-corruption compliance efforts, and is responsible for the administration of this Policy. Any elaboration about or questions regarding topics covered in this Policy may be directed to the Director Operations, and/or Compliance Unit.

24.4.1 Reporting Requirement

TDEA Whistle Blower's Policy chapter 20 of Human Resources Manual provides the detail reporting mechanism and requirement for any unethical, illegal, fraudulent, conduct or not in compliance with TDEA's policies and procedures, which ensures that persons can report fraud free of charge, using different options. Anyone with information regarding fraud or other corrupt practices against TDEA or involving TDEA staff, non-staff personnel, vendors, implementing partners and responsible parties, is strongly encouraged to report this information through the given reporting mechanism.

Following channels may also be used to lodge a complaint:

- Phone / Fax / Courier: Complaints can be lodged through official phone numbers, fax numbers and/or courier address as prescribed on TDEA's website at <https://tdea.pk/contact/>
- Online, through a referral form available at the following web address: www.tdea.pk/complaint/
- Alternatively, complaints can also be sent directly to TDEA by email complaint@tdea.pk

24.4.2 Details that should be included in a report of fraud (Whistle-Blower)

In order for investigations to be successful, complaints should be as specific as possible. To the extent possible, they should include details such as:

- The type of alleged wrongdoing/misconduct;
- When, where and how the wrongdoing/misconduct occurred; and
- Who was involved and may have knowledge of the matter(s) being reported?

Relevant documents or other evidence should be included with the report or provided as soon as possible.

24.5.1 Confidentiality

Requests for confidentiality by persons making a complaint will be honored to the extent possible within the legitimate needs of the investigation. All investigations undertaken by TDEA are confidential. Information will only be disclosed as required by the legitimate needs of the investigation. Investigation reports are confidential and will be considered internal TDEA documents. Whistle Blower Policy 20.3 outlines that "If the reporter's identity becomes known during the review process of the report, TDEA as an entity, TDEA management, recipients of the reports, auditors and investigators have a fiduciary duty to maintain the confidentiality of the identity of the reporter.

24.5.2 Anonymous Reports

This policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously shall be explored appropriately, but consideration shall be given to the following:

- The seriousness of the issue raised.
- The credibility of the concern.
- The likelihood of confirming the allegation from attributable sources.

24.5.3 Protection against Retaliation

TDEA Whistle-Blower's Policy section 20.1.3 "Non-retaliation Policy" provide protection against retaliation. To protect employees, TDEA ensures that none of its staff shall discharge, demote, suspend, threaten, harass, or in any manner discriminate against an employee reporting in good faith within the scope of the whistle-blower policy of TDEA. The employees are expected to exercise sound judgment to avoid baseless allegations. An employee who knowingly or recklessly makes an allegation or disclosure that proves to be unsubstantiated may be subject to disciplinary action.

24.6.1 Investigation of Allegations

All allegations of fraud and corruption are taken seriously. Upon receipt of an allegation, TDEA will assess the case and if it determines that there is sufficient ground to warrant an investigation, it will conduct an investigation. In addition, TDEA may undertake proactive investigations in high-risk areas that are susceptible to fraud and corruption.

Investigation must be conducted in accordance with the investigation procedure outlined in the TDEA's HR Manual under whistle blower policy section '20.3.2.

24.6.2 Action based on investigations

The allegation(s), if substantiated by the investigation, may result in disciplinary and/or administrative actions or other actions taken by TDEA, depending on the nature and severity of the case. The outcomes may be as follows:

- For staff members, disciplinary and/or administrative actions as outlined in Chapter 14 'Disciplinary Procedure' under the HR Policy;
- For Service Contract holders and Individual Contractors, non-renewal or termination of their contract, black listing or other action as deemed necessary.
- For vendors, NGOs and CSOs, termination of the contract and debarment from doing business with TDEA.
- Recovery of financial loss and/or assets suffered by TDEA, and to return funds recovered to the respective funding sources; and
- Issuance of Management Letters to allow business units concerned to take corrective actions and strengthen internal controls.

24.6.3 Remediation and implementation of lessons learned

TDEA will also use its collective knowledge gained from lessons learned on complaints or whistles and investigations to enable TDEA management to be more proactive in dealing with potential systemic weaknesses. When appropriate, TDEA will provide briefings and reports on risks facing the Organization and "lessons learned" from investigations to Board members of TDEA. Proactive action is then taken to address the problems identified and prevent their recurrence.

Board and TDEA shall review periodically the outputs from the investigation processes and the resultant remediation, mitigation, sanctions and recovery cycles, to ensure that this process is operating coherently and timely, and to seek to improve the effectiveness of the process.

24.7.1 REPORTING

TDEA has a long-standing commitment to transparency, including reporting on matters of fraud, bribery and corruption. TDEA management shall present list of cases if any to the Board on periodic basis. Donors or clients may also be informed for the cases relevant to their project(s)/program(s).