



**NATIONAL TESTING SERVICE - PAKISTAN**  
Plot# 96, Street No. 4, Sector H-8/1, Islamabad

**Code of Conduct**  
*(NTS Employees)*



**National Testing Service - Pakistan**

(Under Sub-Rule (4) of Rule 5 of the Public Sector Companies (Corporate Governance)

Rules, 2013)



# **NATIONAL TESTING SERVICE - PAKISTAN**

**Plot# 96, Street No. 4, Sector H-8/1, Islamabad**

## **Preamble:**

National Testing Service – Pakistan (NTS) is working as a Not-for-Profit Company limited by guarantee - not having share capital registered under Section 42 of the Companies Act, 2017 regulated by SECP; and COMSATS University Islamabad (CUI) is its promoter institution. It is an internationally recognized testing and assessment organization facilitating in producing education and market competitive human resource, in order to build and promote standards in educational and professional testing and assessment.

The Information and Documents at NTS are very sensitive in nature and requires maintaining complete secrecy at all levels.

## **Scope:**

This Code of Conduct is developed under Sub-Rule 4 of Rule 5 of the Public Sector Companies (Corporate Governance) Rules, 2013, which clearly sets out that the Board shall formulate a Code of Conduct for all employees of NTS, regardless of the employment or rank, and even from the outsourced manpower like invigilators, supervisors, personnel who provide a wide variety of services including, but not limited to, printing services, photocopying services, postal and courier services, content developing, content reviews, paper checking, and other stakeholders.

NTS shall discourage employees from unnecessary meeting with externals without permission of the respective HODs, accepting gifts from clients or partners. NTS prohibits briberies for the benefit of any external or internal party. The aim of all employees at NTS should be to fulfill their job duties with integrity and respect towards the clients and other stakeholders.

NTS is committed to the highest standards of honesty and integrity in all of its activities ensuring an exemplary conduct. Our actions will always reflect the values and goodwill of NTS, and promote a working environment that upholds and demonstrates our commitment to our core value.

This Code of Conduct (Code) is a statement of values and principles that will guide us in our day-to-day activities. Our continued commitment and uncompromising adherence to this



“Code of Conduct” is paramount to the effectiveness of the NTS as a testing body, ensuring its continued growth as a dependable, trusted and respected organization.

This Code is framed in terms of the requirements as stipulated under the clause ..... of the Human Resource Handbook/HR manual (whatever name it is called at NTS).

## **1. Application of the Code:**

- a) This Code shall apply to:
  - i. All Directors and/or Members of the Board of Directors, including the Chief Executive officer;
  - ii. All executive, officers and managers;
  - iii. All Employees, whether regular, contractual or daily wagers;
  - iv. All outside persons, partnership firms, organizations and/or companies who are connected with NTS, whether directly or indirectly.
  
- b) Violations of this Code will be taken seriously and may result in appropriate disciplinary action, including suspension, dismissal from employment, as well as cancellation of contract of outside persons connected with NTS whether directly or indirectly, etc.
  
- c) All the employees who fall in above mentioned categories are expected to be aware of, and comply with, this Code. Any enquiries about the Code or reports of possible violation/non-observance of this Code will be submitted by the HODs to the Chief Executive Office and in case any violation/non-observance of this code by HODs, the CEO will initiate action and in case of any violation/non-observance is perpetrated by the Director and CEO, the Board will initiate action against him.
  
- d) All the employees are requested to subscribe to the Code and complete the declaration in **Appendix A**.

## **2. Conflicts of Interest:**

*(This matter should be read in conjunction with HR Manual “Conflict of Interest” and HR Handbook on “Code of Conduct and Ethics (requires to be defined clearly and inclusion in the draft HR Manual))*

## **2.1 What constitutes a Conflict of Interest?**

A conflict of interest arises when any employee belonging to the categories mentioned in Clause 1.1 above has an interest, pecuniary or otherwise, which can be regarded a conflict of interest between his duty to perform his functions under the NTS HR Manual and such interest which could impair his ability to consider and decide any question impartially or create bias in his advice as laid down in the said manual. Conflicts of interest may arise in various ways, for example, as the result of:

- a direct or indirect financial interest, including an interest held by a commercial undertaking that we have connections with;
- a personal association or relationship with those affected, or likely to be affected, by the matter an expectation of a future interest a previous association with a matter; or
- an interest with a common interest group, such as a public or private entity.

## **3. NTS Responsibilities:**

- 3.1. The NTS must carry out the work in an environment that is free from improper influences and take all reasonable steps to avoid being in an actual, apparent or potential conflict of interest.
- 3.2. NTS must take steps to ensure that any conflict of interest to which NTS may be subject does not affect, or reasonably appear to affect, a decision taken by the NTS. It is our responsibility to disclose potential or actual conflicts of interest with our duties at NTS, as soon as they arise or NTS becomes aware of them.
- 3.3. NTS must exploit, or reasonably appear to exploit, to our personal advantage any personal or professional relationships with any regulated entity or any organization with which the NTS may have contractual or business relationship, or an officer or employee of such organizations.

- 3.4. In determining to exercise our investigatory power, NTS must not suggest, participate in or assist an investigation aimed at a particular individual for reasons of personal prejudice, vindictiveness or animosity.

#### **4. Types of Conflict to Avoid:**

##### **4.1. Participation in decision-making:**

- a) We shall not participate in making any decisions at the NTS if we could get personal benefits from the decision.
- b) In case, we are a member of a body or group, we may not, in the course of our duties at the NTS, participate in, or attempt to influence, any decision-making of that body or group, if:
  - (i) we could benefit from the decision, or;
  - (ii) as a result of the decision, the interests of the body or group could conflict with the interests of the NTS.

##### **4.2. Preferential terms:**

We shall not accept the services which the NTS is providing on terms that we know are more favourable than the like the NTS service provider entity normally offers.

##### **4.3. Preferential treatment:**

- a) During the course of our appointment with the NTS, we must not give preferential treatment, or the appearance that we are giving preferential treatment, to any person or entity or any former employee, at the NTS.
- b) During the course of our appointment with the NTS, we may not offer assistance to any person or entity dealing with the NTS other than assistance given in the ordinary course of performing our duties or professional obligations.

##### **4.4. Family relationships:**

We may not influence a contract on behalf of the NTS with:

- a) a member of our family; or



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- b) a person or entity that we or a member of our family has a significant relationship with or a substantial interest directly or indirectly hiring the member of our family.

**4.5. Outside commitments and activities:**

We shall not engage in a business or undertaking, outside our employment or appointment with the NTS if:

- a) our private interest in such undertaking could conflict with our duties at the NTS;
- b) our role at the undertaking would interfere our ability to perform our duties at the NTS;
- c) the engagement is in a professional capacity and is likely to influence or harm our ability to perform our duties at the NTS, or
- d) NTS premises, equipment or supplies are used.

**4.6. Involvement in NTS matters:**

We shall not exercise our authority in a matter if, we:

- a) have a personal or pecuniary interest relating to the matter that is, or could reasonably be perceived to, conflict with our ability to exercise an unbiased judgment;
- b) believe that we would be unable to render an impartial decision, or;
- c) have continuing or prior associations or relationships, including family and other close personal relationships, that would reasonably be perceived as preventing us from rendering an impartial decision.

**4.7. After we leave the NTS:**

We shall avoid an actual, apparent or potential conflict of interest between our new employment and our former duties with the NTS, the following rules apply to our activities after we leave the NTS. These rules are not intended to overly restrict former employees (in any capacity in seeking other jobs.

*(This section applies to every former employee who worked at the NTS)*

**4.8. Confidential information:**



We shall not use confidential information that we obtained during our employment or appointment with the NTS in any business or undertaking. We may not disclose confidential information to any person or entity, save for performance of our official functions and/or duties as an employee of NTS.

**4.9. Preferential treatment:**

We may not seek preferential treatment by, or privileged access to, the employees of the NTS.

**4.10. Continued involvement in NTS matters:**

We may not advise or otherwise assist any entity regulated by NTS or any other person or entity in connection with any application, proceeding, negotiation or other matter that we were involved in when we were at the NTS, unless:

- (i) the NTS is no longer involved in it; or
- (ii) one of the exceptions noted in the relevant section applies.

**4.11. Employment:**

We shall not accept employment with a entity regulated by NTS or serve as a member of the board of directors or other governing body of an entity regulated by NTS for a period of six (6) months after leaving the NTS, if, during the six (6) months before leaving the NTS, we had:

- a) substantial involvement with that regulated entity, and;
- b) access to confidential information that, if disclosed to the regulated entity, could result in harm to the NTS or could give the regulated entity an unfair advantage in relation to other parties.

*For employees of all categories, the NTS has the authority to determine the substantial involvement and access to confidential information.*

**4.12. Lobbying:**

- a) We shall not lobby any employee of the NTS for, or on behalf of, any entity which is a service provider of NTS for a period of twelve (12) months after leaving the NTS.

- b) The disclosures made under this section of the Code will be kept confidential and will not be disclosed except where there is;
  - (i) a requirement for disclosure for the purpose of managing potential or actual conflicts or for disciplinary proceedings; or
  - (ii) any legal or regulatory obligation to disclose the information.

## **5. Confidentiality:**

*(This section should be read in conjunction with HR manual “Confidentiality of Information” and HR Manual / Policy & Procedure..... on “Code of Conduct and Ethics”).*

- 5.1. Confidential information is any information that:
  - a) is not available with the public;
  - b) dissemination of which in any form could result in harm to the NTS;
  - c) possession or access to which could give the person to whom it is disclosed an undue advantage; or
  - d) the information is marked as “confidential”.
  
- 5.2. We, because of our position with NTS, have access to confidential information about NTS, its employees, COMSATS University, HEC, the government and other parties that we deal with. We are responsible to safeguard, and liable for, the confidentiality of information that is in our possession or we have access to.
  
- 5.3. We shall not use confidential information:
  - a) to directly or indirectly benefit us or anyone else, or;
  - b) in a business or for other activities outside our appointment with NTS.
  
- 5.4. We shall not disclose confidential information outside the NTS unless authorized to do so by law or the NTS. We may disclose confidential information to others at the NTS only when it is required to properly perform our duties or by law. We must avoid discussion of a matter with any person outside the NTS while that matter is pending.





- 5.5. We shall not accept a gift, directly or indirectly, in exchange for disclosing confidential information.
- 5.6. Any leakage of confidential information would be dealt with as an act of serious misconduct aimed at maligning the reputation of the NTS and could attract disciplinary actions.

## **6. Independence:**

- 6.1. We must reject any effort by representatives of the executive or legislative branches of the government to affect our independent determination of any matter being considered by the NTS.
- 6.2. We must not be swayed by partisan demands, or considerations of personal popularity or notoriety; and perform the functions above fear of unjust criticism by person, party or group.
- 6.3. We all must strive to ensure, protect, maintain and promote the independence of the NTS at all times.

## **7. Ethical Responsibilities:**

*(This section should be read in conjunction with HR Handbook Chapter..... on “Code of Conduct and Ethics”).*

- 7.1. Appointment with NTS as an employee or dealing with NTS is a high honour and requires that our conduct, not only in the performance of the duties of this office but also in the everyday life, should be beyond reproach.
- 7.2. We must act in an honest and ethical manner when dealing with each other, business stakeholders and other third parties, to promote trust and confidence.
- 7.3. We must not solicit or offer any gift or other item of monetary value to/from any person or entity seeking administrative action from, doing business with, or



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conducting activities regulated by the NTS, or whose interests may be substantially affected by the performance or non-performance of his/ her duties.

- 7.4. We must not participate in any private event/function organized by any entity which is a service provider or supplier of the NTS and should not invite any entity which is a service provider or supplier of the NTS to our private functions. *A Chief Executive Officer or HOD can participate/invite an executive and/or official on such events subject to approval of the Board.*
- 7.5. Lapses in integrity, compromise trust and confidence and undermine the efforts of NTS in serving its stakeholders. Any actions casting doubt on the integrity of the NTS would be considered as acts of serious misconduct.
- 7.6. We should recognize our obligation to preserve the sanctity of the matters administered by us and for this purpose pursue and prosecute, vigorously and diligently all matters which we oversee.



**Appendix A**

**Declaration of Compliance with**  
**National Testing Service - Pakistan**  
**(Code of Conduct)**

I \_\_\_\_\_ do hereby affirm and declare that I have read and understood the contents of the Code of Conduct and undertake to abide by the requirements of this Code in discharge of my duties, and perform my functions, as an employee or dealing with the National Testing Service -Pakistan, honestly, to the best of my ability, faithfully in accordance with the HR manual.

Name: .....  
Employee ID or dealing with NTS: .....  
Designation/in the capacity of: .....  
Signature: .....  
Date: .....