

Code of Conduct



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The Code of Conduct is equally applicable to the Board of Directors as well as all the employees of the Company. The Salient features of the Code of Conduct are as follows:

BUSINESS ETHICS

- I. The Company's policy is to conduct its business with honesty and integrity and be ethical in its dealings, showing respect for the interest of all stakeholders including its shareholders, employees, customers, suppliers and society at large.
- II. The Company is dedicated to providing a safe and non-discriminatory working environment for all employees.
- III. The Company does not support any political party or contribute funds to groups whose activities promote political interests.
- IV. The Company is committed to provide products which consistently offer value in terms of price and quality and are safe for their intended use, to satisfy customer needs and expectations.
- V. The Board of Directors and the management are both committed to ensuring that the Company is a responsible corporate entity, and that business shall be carried out in a sustainable manner.
- VI. Operations shall be carried out with minimum adverse effect on the environment and producing quality products in a healthy and safe working environment.
- VII. The Company, as a responsible corporate entity, shall play its part in the betterment of society in health and education sectors as a part of our Corporate Social Responsibility.
- VIII. The Board of Directors and the Employees shall not indulge in insider trading and unfair market practices.

CONFLICTS OF INTEREST

- I. Every employee should conduct his or her personal and business affairs in a manner such that neither a conflict, nor the appearance of a conflict, arises between those interests and the interests of the Company.
- II. An employee should avoid any situation in which he or she, or a family member, might profit personally (either directly or indirectly) from the Company's facilities, its products, or relationships with its vendors or customers.
- III. An employee should not permit himself / herself (or members of his/her family) to be obligated (other than in the course of normal banking relationships) to any organization or individual with whom the Company has a business relationship. However, business lunches, dinners or social invitations, nominal giveaways and attendance at conferences and seminars would not be considered a violation of this Code.
- IV. Conflicts of interest shall be avoided and promptly disclosed where they exist, and guidance should be sought from supervisors.

ACCOUNTING RECORDS, CONTROLS & STATEMENTS

- I. All books, records, accounts and statements should conform to generally accepted and applicable accounting principles and to all applicable laws and regulations and should be maintained accurately.
- II. Employees are expected to sign only documents or records which they believe to be accurate and truthful.

ENVIRONMENT, SOCIAL & GOVERNANCE

- I. The Company is committed to carry its business in an environmentally sound and sustainable manner and promoting preservation and sustainability of the environment.
- II. All employees are required to adhere strictly to all applicable environmental laws and regulations that impact on the Company's operations.



- III. The Company promotes environmental, social and governance (ESG) compliances including but not limited to health and safety aspects in its business strategies.

REGULATORY COMPLIANCE

- I. The Company is committed to make prompt public disclosure of 'material information' regarding the company as prescribed by the Pakistan Stock Exchange Regulations, if required.
- II. Where an employee is privy to the information which is generally referred to as 'material inside information', the same must be held in strict confidence by the employee involved until it is publicly released.
- III. The Employees shall abide by the appropriate competition laws and shall not enter into understandings, arrangements or agreements with competitors which have the effect of fixing or controlling prices, dividing and allocating markets or territories or boycotting suppliers or customers.

ANTI-BRIBERY - ANTI-MONEY LAUNDERING

- I. Employees shall not engage in any kind of bribery, extortion and all other forms of corruption. In case an employee is offered or receives any gift, payments or favors or something of value from suppliers or any business associates, which he/she believes may be questionable under this Code, he/she should disclose the matter to the relevant person of the Company.
- II. Employees are strictly prohibited from participating in money laundering, financing of terrorism, or engaging in transactions with individuals or entities involved in such activities.

PERSONAL CONDUCT

- I. All employees should conduct themselves with the highest degree of integrity and professionalism in the workplace or any other location while on company business.
- II. Employees shall be careful while dealing with personal or business associates and not disclose, divulge or provide any information regarding the Company to anyone except where the same is used as a part of his/her official obligations and as required for official purpose and shall abide by the Closed Period announced

by the Company from time to time and also sign a Non-Disclosure Agreement if the need arises.

- III. Employees should always be cognizant of the need to adhere strictly to all safety policies and regulations.
- IV. Any legally prohibited or controlled substances, if found in the possession of any employee, will be confiscated and, where appropriate, turned over to the authorities.
- V. Employees must ensure no instances of personal deliveries using the Company's resources, tax number and/or business name.

HARASSMENT-FREE WORKPLACE

- I. The Company is committed to providing and maintaining a work environment free from harassment of any kind, whether physical, verbal, psychological or otherwise. Employees are encouraged to report any incidents of harassment promptly to the relevant person of the Company.
- II. The Company will take immediate and appropriate action to investigate and address any reported incidents of harassment.

MISCELLANEOUS

- I. All Employees are required to comply with this Code of Conduct and are personally responsible for doing so. Employees must comply with any rules set out in this Code of Conduct. Breach of any principles within the code may result in disciplinary action and a serious breach – such as if any employee is found to be in wanton abuse of the Code and their action can cause reputational risk or damage or financial loss to the Company, may amount to gross misconduct, which may result in dismissal. Further, the Company reserves the right to seek redress and damages from such individuals.
- II. Employees at all levels will be required to certify annually that they understand the Code and that they are in full compliance with this code. The Board monitors the findings of this certification on an annual basis.
- III. The Company has in place a confidential 'Whistleblowing Policy' as a mechanism and process to encourage the reporting of any non-compliance with the Code of Conduct.
- IV. Employees agree that all right, title and interest in and to all work product resulting during the

course of their employment with the Company, whether created, generated or produced by the Employees or others or under the supervision of Employees, including, without limiting the generality of the foregoing, all ideas, designs, concepts, information, data, inventions, improvements, works, discoveries, know-how and all intellectual property, including but not limited to patent, copyright, trade secrets and other related rights, belong to the Company exclusively and shall be the exclusive property of the Company and may be used by the Company at any time without any obligation to pay the Employees any compensation whatsoever, and to the extent that ownership of such work product may not automatically vest in the Company by operation of law or otherwise.

- V. Employee hereby assign, and upon the future creation thereof shall assign, all right, title and interest in and to the work product to the Company without any obligation on the part of the Company to pay the Employees any compensation whatsoever, and the Employees shall not use the same for any purpose other than for the benefit of the Company nor will the Employees pass it on to any other person or institution other than to those approved by the Board and the Employees will not take the same with them when the Employees cease to be an employee of the Company for any reason whatsoever (and shall return such work product to the Company).

- VI. Employee shall take all steps and shall execute all such documents as may be necessary or reasonably required by the Company, at the expense of the Company, to procure and ensure that the Company obtains and retains complete and exclusive legal title to any such invention or improvement, and the Employees shall assist the Company in obtaining, securing, enforcing and retaining the abovementioned intellectual property rights as is needed by the Company.



Mechanism for Providing Information

FORMAL REPORTING LINE

The current organizational structure of the Company consists of various departments/divisions, each of which is led by a divisional/department head.

EMPLOYEES

Employees are encouraged to express their views and suggestions through open channels of communication. We follow an open-door policy and employees are free to send emails, phone, or even talk directly to the CEO. The employees can give suggestions for process/policy improvement, can freely raise grievances and concerns about matters related to the Company. In case the matter is of significant nature, the same is addressed in the meetings of the Management Committee, the Board of Directors, or the relevant Board Committee.

Townhall meetings are conducted regularly during which the CEO shares information about the Company's results, plans and strategic directions with employees. Employees are encouraged and accorded an opportunity to actively participate, share their ideas and suggestions.

The Company also has a Whistleblowing Policy in place which provides an additional avenue to employees to report any corrupt or unethical behavior.

SHAREHOLDERS

Every year the Annual General Meeting of shareholders is held in accordance with the requirements of the Companies' Act 2017, which is attended by the Board, CEO, Company Secretary, CFO and the senior management of the Company. The interactive session with the shareholders allows the shareholders to ask questions on financial, economic, social and other issues and also give suggestions and recommendations. The CEO responds to all questions.

The Company has also provided contact details of all relevant personnel for general and specific queries on its website.

MANAGING CONFLICT OF INTEREST

As per the Code of Corporate Governance, the Company annually conducts awareness sessions and circulates the Code of Conduct amongst all employees and Directors. Further, the Directors and key employees are reminded of insider trading and to avoid dealing in shares during closed period.

Every Director is required to bring to the attention of the Board complete details regarding any transaction which has a conflict of interest for prior approval of the Board. The interested Directors neither participate in discussions nor vote on such matters.

The complete details of all transactions with related parties are provided to the Board on a quarterly basis for approval. These transactions are also fully disclosed in the annual financial statements of the Company.

