



Code of Conduct

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:

(a) 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 the society.
- 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 contributes 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 ensure that the company is a responsible corporate citizen and the business shall be carried out in a sustainable manner.
- vi) The operations shall be carried out with minimum adverse effect on the environment and producing quality products in a healthy and safe working environment.
- vii) We, as a responsible corporate citizen shall promote our role towards betterment of the society in health and education sectors as a part of our Corporate Social Responsibility.

(b) Conflicts of Interest

- i) Every employee should conduct his/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 company's 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) In case an employee is offered or receives something of value which he/she believes may be impermissible under this Code, he / she should disclose the matter.

v) All employees shall avoid any kind of bribery, extortion and all other forms of corruption.

vi) Conflict of interest shall be avoided and promptly disclosed where they exist and guidance should be sought from superiors.

(c) 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.

(d) Environment

- i) The company is committed to carry its business in an environmentally sound and sustainable manner and promote preservation and sustainability of the environment.
- ii) All employees are required to adhere strictly to all applicable environmental laws and regulations that impact the company's operations.



(e) Regulatory Compliance

i) The company is committed to make prompt public disclosure of “material information” regarding the company as prescribed in 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.

(f) 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) The 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 Close Period announced by the company from time to time and also sign a Non-Disclosure Agreement if the need arises.

iii) All employees should avoid any kind of bribery, extortion and all other forms of corruption.

iv) Employees should always be cognizant of the need to adhere strictly to all safety policies and regulations.

v) 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.

(g) 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 cause reputational risk or damage or financial loss to the Company may amount to gross misconduct, which may result in summary 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 annual basis.

iii) The Company has in place a confidential “Whistle Blowing policy” as whistleblowing mechanism and process to encourage the reporting of any non-compliance with this code of conduct.



MECHANISM FOR PROVIDING INFORMATION

Formal Reporting Line

The current organization/structure of the Company consists of various departments/divisions, each of which is led by a divisional head. These divisional heads are responsible for the reforms of their respective divisions and the Board can then have access to them.

Employees

Employees are encouraged to express their views and forward their suggestions. 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, grievances and concerns or raise any matter 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.

The Company also has a Whistle Blowing Policy to enable employees to raise serious concerns to the Management regarding the business or Company without fear of repercussions.

The CEO also meets the entire Management Committee at least once every quarter through which they are provided an opportunity to express their concerns and suggestions directly to the CEO. These meetings are aimed at capturing free and first hand suggestions.

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 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 for approval. These transactions are also fully disclosed in the annual financial statements of the Company.