

CODE OF CONDUCT

Purpose:

Shifa International Hospitals Limited (hereinafter referred to as Shifa or Hospital), a public limited listed Company and a leading hospital in the country in private sector always strive for observing and following prevailing laws, ethical and moral values, also requires certain behaviors and obligations from the employees of the Hospital to ensure the promotion and integrity of the Hospital's values and mission.

This Code of Conduct is prepared for the directors, officer, employees, consultants and agents of the Company [hereinafter referred to as the employee(s)] to observe the very conduct envisaged in the Code failing which they shall be accountable in accordance with the provisions of this Code of Conduct.

Codes:

1. **Legal Compliance**
2. **Quality of Care**
3. **Political Activities**
4. **Inappropriate Gifts**
5. **Conflict of Interest**
6. **Confidential Information**
7. **Retention of Complete and Accurate Record**
8. **Environmental Protection**
9. **Safer Work Place**
10. **Harassment or Discrimination**
11. **Use of Assets**
12. **Disciplinary Action**
13. **Commitment to Community**

1. LEGAL COMPLIANCE

Shifa is committed to comply with all prevailing applicable laws, rules and regulation that regulate the affairs of the Hospital and the people working with it over and above complying with the general ethical and legal principles of the Hospital and expect the employees to acquaint themselves with and follow in letter and spirit all the legal requirements connected with their assigned duties and responsibilities. If the

employees are confused or for any reason unable to interpret the laws and regulations the same may be directed to the Legal Department for seeking an advice.

2. QUALITY OF CARE

All the employees associated with the care of the patients whether directly or indirectly shall maintain high standards of professionalism in the respective facilities they are working in and shall deliver seamless quality health care services to the patients in a reasonable, reliable and cost-effective manner. No employee shall recommend or encourage hiring unqualified individuals to practice or provide care in any department or program that may jeopardize the Company's endeavor and commitment to provide quality healthcare services.

Quality of care also requires that the information related to patients shall be strictly kept confidential and shall only be released in accordance with the Hospitals' policies and procedures and/or in accordance with law of the land. Therefore, the employees shall maintain patient confidentiality and ensure that each patient's health information is preserved in accordance with the policies of the Hospital. It shall also be the responsibility of the employees that all patient records shall meet the documentation standards required for quality care and comply with all laws, rules, and regulations

3. POLITICAL ACTIVITY

Shifa International Hospitals Limited is a public limited listed Company incorporated under the Companies Ordinance, 1984. Companies Ordinance prohibits the companies incorporated under the Companies Ordinance, 1984 to make contributions to any political party or for any political purpose to any individual or body.

Therefore, Hospital's funds or resources shall not be used to contribute to any political party or for any political purpose or for gifts or payments to any political party or organization.

While Shifa supports employee participation in the political process in their capacity as private individuals, employees are not permitted to use their positions in Hospital to try to influence the personal decisions of others to contribute, or otherwise support, political parties or candidates.

4. INAPPROPRIATE GIFTS

Hospital employees shall not accept any gifts whatsoever from any patient, patient's family, vendors, suppliers or their staff etc. except for nominal gifts received through

the normal course of acceptable business practice. Gifts of a personal nature offered to employees by physicians are to be discouraged.

5. CONFLICT OF INTEREST

Conflict of interest may be defined as a situation that has the potential to undermine the impartiality of a person because of the possibility of a clash between the person's self-interest and professional interest whether pecuniary or otherwise. Therefore, in case where an employee is involved in the Company's decision of whether to enter into a contract, transaction or financial relationship in which he/she is interested shall disclose the extent of his/her interest in that contract, transaction or financial relationship thereafter management of the Hospital should decide whether to continue the proposed contract or transaction as the case may be taking into account the best interest of the Hospital.

Following individuals shall complete and sign the Conflict of Interest Disclosure Form to be devised by the Human Resource Department by 10th July of every year:

1. Directors
2. Managers and above
3. All employees of procurement department

The consultants and other employees who are in a position to influence the decisions of the Hospital in connection with the procurement of goods and/or services shall also complete and sign the Conflict of Interest Disclosure Form and shall submit the same to the procurement/concerned department respectively.

6. CONFIDENTIAL INFORMATION

All the business secrets and other information including but not limited to personnel data, patient lists, financial data, clinical information, strategic plans, marketing strategies, processes, techniques, softwares developed in house or the tailored softwares procured from outside etc. which is not in the public domain is the confidential information and it shall be the duty of every employee to keep this information strictly confidential even after leaving Shifa.

Employees shall also not be allowed to use price sensitive information to buy, sell, or retain shares of the Hospitals or benefit financially from that information in any way which they may receive while performing their job and which is not made public. Using insider information for personal benefit or its disclosure to other prior to release to general public is violation of the Shifa's Policy and the corporate laws which shall be subject to strict action accordingly.

7. RETENTION OF COMPLETE AND ACCURATE RECORD

Shifa encourages transparent operations of the Company therefore; it maintains accurate, complete and legible records. It is equally essential that every employee accurately and clearly report the relevant facts or the true nature of a transaction as these records serve as a basis for managing Shifa's business and is important to meet obligations under different laws. No employee should knowingly make any false or misleading statement on any form or to any other officer, employee, government official or auditors, whether internal or external, of Shifa.

8. ENVIRONMENTAL PROTECTION

It is the policy of the Hospital to comply with all the laws, rules, regulations and policies related to the environmental protection. Employees shall dispose of all hospital wastes and other materials in the manner as required by laws, rules, regulations and policies. In the same way all chemicals and hazardous substances shall be stored in accordance with applicable laws and regulations.

9. SAFER WORKPLACE

All employees shall ensure that the operations of the Hospital are conducted in a manner that best safeguards the patients, visitors, employees and other person coming to the Hospital and shall comply with all safety laws, policies, procedures and standards. It shall also be the duty of the employees to attend and/or complete all safety and security training programs.

10. HARASSMENT OR DISCRIMINATION

Shifa proscribes harassment of the employees in any form by any individual falling within the ambit of this policy. It is also the policy of Shifa that no one should be discriminated on the basis of race, color, religion, age, disability or gender in providing services to patients or in relation to its employment practices.

11. USE OF ASSETS

All employees are responsible for protecting and preserving Shifa's assets and to prevent their waste, loss, theft or unauthorized use.

12. DISCIPLINARY ACTION

Failure to abide by this Code of Conduct by any employee may result in disciplinary action and other adverse consequences.

13. COMMITMENT TO COMMUNITY

Shifa is mindful towards its Corporate Social Responsibilities and expects that each employee shall strive to be a good corporate citizen and is encouraged to be a useful and a beneficial member and make contributions to his/her community.

Related Policies

Policy for Damage / Loss of Hospital property accountability

Policy for Disciplinary Action

Policy for Employee Health Service

Policy for Grievance

Policy for Incidents reporting & handling

Policy for Recruitment

Policy for Smoking

Policy for Termination

Policy for Weapons, Illegal drugs & Alcohol

Policy for Hospital Records and Confidential Information

Policy for Sexual Harassment