

CODE OF CONDUCT



SULTAN UNITED MEDICAL COMPANY

2020

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1 Company Values

SUMC is a place where personal and professional integrity are paramount. Our goal is providing the highest-quality service to our clients, while maintaining an exceptional standard of conduct.

Our Code of Conduct rest at the core of our shared values and reflect the extent to which **SUMC** is committed to ethical practices.

SUMC expects its employees to adhere to a standard of professional conduct and integrity. This ensures that the work environment is safe, comfortable, and productive. Employees should be respectful, courteous, and mindful of others' feelings and needs.

OUR VALUES

Integrity

- Our high principles and professional standards stand behind our commitment to honesty and trust.

Quality

- To deliver the world class products and services in compliance with the local and international standards and using customer feedback to improve our services.

Commitment

- Signifies the commitment of our team towards achieving objectives and life goals.

Inclusion

- Understanding that everyone is unique and recognizing our individual differences. along the dimensions of race, ethnicity, gender, age, physical abilities, religious beliefs, political beliefs, or other ideologies.

2 Introduction

Purpose

- The purpose of the Company's Code of Conduct ("Code of Conduct") is to set a standard of behavior among employees and to provide guidelines for all employees to maintain a working environment that is productive, positive, enjoyable, safe and free from harassment and discrimination.
- All references in this manual to word "Company" shall be deemed to be referenced to **SUMC** and all references to word "Employee" shall be deemed to be referenced to all employees, consultants, independent consultants and partners working for the Company.

General Principles

- All employees shall comply with the Company's Code of Conduct.
- All employees should act honestly and with integrity in all dealings on behalf of the Company, and always act in good faith and in the best interests of the Company.

Compliance with laws, rules, and regulations

- It is the Company's policy to comply with all applicable laws, rules and regulations.
- Each employee must accept and comply with the laws and regulations and business practices wherever the Company operates without compromising on Company principles or Code of Conduct.

Violation

- Any employee who becomes aware of any existing or potential violation of this Code must promptly notify the concerned Department Manager.

- The Company will take appropriate disciplinary action to address any reported existing or potential violation of this Code.
- All employees shall notify the concerned Department Manager on becoming aware of any breach of a law or regulation, or instances of unethical behavior.
- The Company will not tolerate any act of retaliation against any person who reports suspected violations of this Code. On the other hand, it is a violation of this Code to submit a report that is known to be false.
- Each employee has a duty to cooperate with internal or external investigations, inquiries, or reviews of concerns or alleged misconduct in a forthright manner. In such situations, they must provide honest, accurate, complete and timely information.

3 Workplace Environment

Equal Opportunity and Human Rights

- The Company treats all applicants and employees based on their qualifications, achievements and demonstrated skills without regard to age, race, color, gender, religion, disability, national origin or marital status.
- The Company strives to provide an inclusive work environment in which different ideas, perspectives, and beliefs are respected.
- The Company will take positive steps in ensuring that it is not at any point in time by any of its business relations, directly or indirectly complicit to Human Rights or labor practice violations.

Integrity, fair dealing, and trust

- The Company always acts with integrity by being honest, by following the policy and applicable laws, and treating others fairly and respectfully.
- The Employees are expected to act with integrity in all their official activities, avoiding any behavior that would reflect adversely on themselves or on the Company.
- The Company treats everyone fairly. Selections, recruitments, trainings, and pays are based on merit, experience, performance, and other work-related criteria.
- Employees should always give honest feedback and professional opinions while dealing with clients and should never be influenced by considerations of the risk of losing future work due to giving unwelcome feedback or adverse professional opinions.
- Each employee is responsible for creating a climate of trust and respect, and for promoting a productive work environment.

Illegal Drugs and Alcoholic Beverages

- Employees must never report to work under the influence of drugs, alcohol or any other substance that may impair our ability to work safely and productively.
- The Company prohibits the possession, use, sale, purchase or distribution of any illegal drugs or substances by any employee on Company premises, at all times.

Smoking

- Smoking is strictly prohibited in all offices and Medical Centers. Smoking should only be within the permitted place on the Company’s premises.

Harassment and Discrimination

- The Company does not discriminate against others based on race, color, gender, age, national origin, ethnicity, religion, marital status, pregnancy, physical or mental disability.
- The Company does not tolerate harassment which may come from colleagues, managers, partners, contractors or clients.
- It is important to note that harassment can be sexual or non-sexual in nature. Sexual harassment may include:
 - Unwanted advances
 - Inappropriate touching
 - Sexually suggestive comments or jokes
 - Requests for sexual favors
- Non-sexual harassment may include:
 - Offensive comments
 - Inappropriate comments about appearance
 - Jokes or pictures related to race, religion, ethnicity, gender or age
- If any employee felt that he/ she have experienced or observed any discriminatory or harassing behavior, he/ she is encouraged to disclose the situation to his/ her concerned Department Manager / or the Human Resources Department.

Workplace Safety and Health

- The Company is committed to provide a healthy and safe workplace and comply to all regulations governing Health, Safety & Environment at the job site. Maintaining such a workplace is a shared responsibility of the Company, managers and employees.
- The possession or use of firearms, other lethal weapons, ammunition, explosives or

hazardous materials by an employee in the Company premises is prohibited.

- All employees shall be responsible for following safety regulations and acting in a manner that does not endanger the safety of the company assets and/or other employees.
- All Company offices have fire alarm systems with smoke and heat detection sensors that will automatically trigger the alarm system, giving early warning of a possible fire.

Dress Code and Personal Appearance

- Employees are expected to reflect a professional image by maintaining appropriate dressing and personal hygiene. Moderation and common sense should be used in all these matters to assure the employee is suitable for work and the respective work environment.
- In our business environment, the standard of dressing for men and women is a suit, a coat and pants or a skirt, or a dress paired with appropriate accessories.
- Transparent clothing or clothing that reveals too much cleavage, your back, your chest, your feet, and your stomach is not appropriate.
- Clothing should be pressed and never wrinkled. Torn, dirty, or frayed clothing is unacceptable. All seams must be finished.
- Any clothing that has words, terms, or pictures that may be offensive to other employees is unacceptable.
- Following is a list of appropriate formal business attire. It tells you what generally acceptable as formal business attire is and what is not.
- Inappropriate slacks or pants that are too informal. This includes jeans, sweatpants,

exercise pants, flannel pants, synthetic material pants, Bermuda, shorts, bib overalls, leggings, and any spandex or other form-fitting pants such as people wear for exercise or biking.

- Dresses, skirts with blazers, two-piece suits or sets, and knee-length skirts are acceptable. Short, tight skirts that ride halfway up the thigh are inappropriate for work. Mini-skirts, shorts, sun dresses and beach dresses, are inappropriate for the office.
- Shirts, dress shirts, sweaters tops, and high necks are acceptable attire for work if they contribute to the appearance of formal, professional dress. Most suit jackets are also desirable attire for the office. Inappropriate attire for work includes tank tops; midriff tops; shirts with potentially offensive words, terms, logos, pictures, cartoons, or slogans; halter-tops; tops with bare shoulders or plunging necklines; golf-type shirts; sweatshirts; and t-shirts.
- Decent walking shoes, dress shoes, loafers, boots, flats, dress heels, and backless shoes are acceptable for work.

4 Information Security

Confidentiality, Privacy and Information Security of the Company and Clients

- While working for the Company and after cessation of employment with the Company, employees shall maintain and protect the confidentiality of information, data, financial and professional secrets relating to the Company obtained during the course of their employment within the Company or any of its clients.
- Information privacy and security applies not only to the company and client information, but also to anyone who may have a

relationship with the Company, including individuals, Associated Entity, partners and team members

- All employees shall be personally responsible for the integrity of the information, reports and records under their control. Records shall be maintained in sufficient detail as to reflect accurately all company transactions.
- Employees must always respect the confidentiality of client information and never use information acquired during the consulting contract without the written permission of the client.
- Each employee must take appropriate measures to safeguard company and client information from inappropriate use, access, alteration, disclosure, or destruction.
- Every employee is required to immediately report any incident that might violate the Information Security Policy or place the Company's information, assets, and communication systems at risk.
- Failure to protect the Company's information, assets, and communication systems or failure to cooperate with inquiries or investigations may result in corrective disciplinary action, including termination of employment.

Non-Public Information

- All non-public information about the Company shall be considered confidential information. Employees who have access to confidential information about the Company are not permitted to use or share this information for trading or any other purposes except the conduct of the Company's business.
- The employees should not use nonpublic information of the Company, principles or

clients for personal financial gain, or for the financial gain of for others.

- Non-Public information will be kept confidential and will be used for business purposes for which it was disclosed.

Confidentiality of Personal Information

- The Company respects the privacy and dignity of its employees and safeguard the confidentiality of employee records.
- The Company is committed to protect Employee personal information, whether in paper or electronic format, and use it only for legitimate business purposes, in accordance with all relevant laws. Some common examples of private personal information include:
 - Benefits information
 - Compensation and payroll information
 - Medical records
 - Employment history
 - Personal contact information

Intellectual property

- The Company respects the property rights of others, including their copyrights, trademarks and trade secrets. The employees shall understand that unauthorized copying of copyright protected works is not permitted, and may subject the Company and the employees to legal liability. The Company recognizes that permission is required to use other person's intellectual property.

5 Use of Assets and Property

Use of Company Assets and Properties

- All employees shall be responsible for safeguarding the tangible and intangible

assets of the Company. Assets include but are not limited to cash, securities, business plans, intellectual property, physical property and services.

- All employees shall utilize Company property and refrain from mishandling such property. Below are some examples of property misuse:
 - Unauthorized or improper use of Company property or equipment, including vehicles, telephone or mail service.
 - Unauthorized possession or removal of Company or another person's private property.
 - Unauthorized use, lending, borrowing or duplicating of Company keys.
 - Unauthorized entry to property, including unauthorized entry outside of assigned hours of work.
- The employee should never use the Company assets and property for improper personal gain, or otherwise compete with the Company.
- On termination of the employment contract, the employee must return to the Company in accordance with its instructions all Company's property (including mobile phones, personal or lap-top computers), keys, passes, correspondence, software, discs, notes, reports and other documents and any copies thereof as well as any other Company belongings, which are in the Employee possession or under his/ her control.

Use of Client Assets and Property

- In order to earn clients' trust, the employees must safeguard client property. This property should be used only in accordance with the client directions and policy. Using

such property inappropriately or for personal gain is a violation of this trust.

Computers & Communications System

- Employees must safeguard the company's computers and related equipment and networks (including Internet access), software, telephone and voicemail systems, and protect important company data stored on these systems.
- Employees shall never use the company's systems to transmit or receive electronic images or text of a sexual nature or containing ethnic slurs, racial epithets or any other material of a harassing, offensive or lewd nature.
- The official email shall be for legitimate business use only and related to assigned duties. Non-business email to non-employees is permitted provided that it is kept to a reasonable level. Non-business emails with attachments shall not be stored in the Company's mail system.
- All email communications by the Employees shall contain a standardized email body and signature in terms of font, font size, font style, color, etc.
- Employees may access the Internet through the Company network solely for the purpose of conducting Company business; Viewing, downloading, copying, sending or processing information outside the scope of Company business is strictly prohibited.
- Employees shall access the Internet in a manner which does not compromise the security and integrity of the Company's network, such as allowing intruders or viruses into the company network.

6 Conflicts of Interest

Identifying and Disclosing Conflicts of Interest

- The employee is responsible for acting in the Company's best interest at all times. Under no circumstances shall he be permitted to engage in any work for himself or for others either directly or indirectly with or without remuneration.
- The employee shouldn't provide any advice or follow-up to any third party without the prior written permission of the Company during or outside the working hours or during his/ her annual leave and holidays as long as this employment contract remains in force.
- The employee conflict of interest occurs when an individual's private interests interfere with the Company. An employee must never use or attempt to use his or her position at the Company to obtain any improper personal benefit for himself or herself, for his or her family members, or for any other person, from any person or entity.
- The employee should always declare any interest he or she has in the client's business or business competitors. Any relationship to an employee with the client or the client's competitors should be revealed either before signing the contract, or if the relationship arises afterwards, as soon as practicably possible.
- The employee shall not acquire nor retain any commercial or business interest, direct or indirect, in any contracts or deals concluded by the Company and shall not pursue any activity, which is not in the interest of the employee nor associate with any third party pursuing such activities without the written permission of the Company.
- The Company's interest must come before the personal gain of employees.
- Employees shall not place themselves in situations where their own personal interests could conflict directly or indirectly with the business interests of the Company.
- Employees shall not misuse their official position or information acquired during their official duties to serve their own personal interests or those of others outside of business and must comply with the overall business interests of the Company.
- If a situation could cause a potential conflict of interest that cannot be avoided, the employee must report the situation immediately to his/her Department Manager.
- It is the responsibility of the employee to disclose any personal interest he/she may have in a company or other matter where the employee is involved in the assessment, negotiations or other activity relating to that matter.
- The Company must identify, prevent, and disclose to its Principal immediately situation where there is an actual conflict of interest, or even the appearance of a conflict of interest. These situations include, but are not limited to, employment of governmental officials by the Company, having a government official as a shareholder, employment of a or familial relationships with Principal's employees, or any other situation where it may appear that the Company's decisions influenced by personal interests or relationships.

Accepting and Providing Gifts or Entertainment

- Business gifts and entertainment are commonly exchanged to develop and encourage strong working relationships with clients, principles, and business partners. Giving or receiving any gift, meal, favor, service, offer of entertainment or any of monetary value is not an appropriate activity if it creates a sense of obligation, cloud employee judgment when making decisions for the Company, puts the Company in a situation where it may appear biased, or is done with the intent to influence a business decision.
- Employees from time to time may invite clients, partners or third parties, or be invited for business or casual dinners and outings, and also may be inclined to give and/ or receive gifts as part of their interaction with them.
- “Gifts” are usually goods and services; it can be defined as any item of value. “Entertainment” includes events where both the person offering and the person accepting attend, such as meals or sporting events.
- The Company may give or accept a gift or entertainment only when it meets the following criteria:
 - Gifts of reasonable value
 - Not cash or a cash equivalent or a gift of packaged alcohol
 - Must be disclosed to the Department Manager or the GM for approval.
 - Not restricted or prohibited by the terms of any applicable contract.
 - Does not violate applicable laws or ethical standards.
- The Company may occasionally provide items that have genuine educational function or benefit patients, such as textbooks or anatomical models, if they are modest in value and in accordance with the national and local laws, regulations and industry and professional codes or conduct of the country where the Healthcare Provider is located.
- Employees shall not accept or allow a close family member to accept gifts, services, loans or preferential treatment from anyone in exchange for a past, current, or future business relationship with the Company.
- Under no circumstances must employees offer or accept money from clients, vendors, business partners or third parties.
- Invitations where travel and accommodation are involved should be in line with applicable local laws and in compliance with the Principals regulations and standards.
- in accordance with the local and industry codes.
- The Company do not offer or give money or gifts to any government official or political party or candidate for an illegal purpose. The Company shall not violate its clients’ policies that do not permit the giving of gifts.
- Where allowed by local law, the company may provide a modest and occasional meal to the Healthcare Providers as business courtesy in the context of a business meeting so long as the primary purpose is legitimate business reason, not a purely social interaction; the meal is incidental to the business interaction; it is provided in a setting that is conducive bona fide scientific,

educational, or business discussions; and the Distributor representative personally attends the meeting.

- The Company may pay for the Healthcare Provider lodging for a training event or other appropriate business occasion where lodging is modest, appropriate and reasonable based upon program requirements, convenience of attendees and reasonable cost. The Company will not pay any additional costs associated with any trip or hotel extensions requested by the Healthcare Provider beyond the needs of the event and should be in line with applicable local laws and in compliance with the Principals regulations and standards.
- The Company may not provide meals, other hospitality, travel, lodging or other expenses for guests of Healthcare Providers or for any other person who does not have bona fide professional interest in the information being shared at the meeting.

Samples and Free Products

- The Company may provide a limited number of sample or free products to customers for evaluation purposes or as a part of an appropriate discount promotion program, in accordance with the local and industry codes.
- The provision of such products should be appropriately documented in writing to the customer institution.
- The Company shall keep detailed records of its samples and free products provided to customers.
- Provision of samples or free products should not result in personal benefit to any Healthcare Provider or government official.

Discounts

- Discounts must be defined at or before the time of sale in a written contract between the parties and must not result in personal benefit to any Healthcare Provider or government official.

Anti-Bribery

- Any offer of a payment or anything of value to influence a business decision or action could be considered a bribe or kickback. An employee must never offer, request, accept, or indicate willingness to accept such a payment or giving of anything of value to any customer, Healthcare Provider, government official, or any other third party, for the purpose of obtaining any improper business advantage. “improper” means unlawful, or with a corrupt purpose. “Anything of value” includes, but is not limited to:
 - Cash
 - Rebates
 - Discounts
 - Travel and Lodging
 - Gifts
 - Sponsorships
 - Contracts
 - Loans
 - Tickets, entertainment
 - Employment promise
 - Use of materials, equipment, software, or facilities
- The company complied with all applicable laws and regulations including, without limitation, anti-corruption laws in all aspects of the performance of its agreement with the Principal.

Events, Training & Conferences

- The Company may organize events with the Healthcare Providers to provide instruction, education and training or to explain safe and effective use of Principal’s products inline with applicable local laws and in compliance with the Principals regulations and standards.
- The Company may reimburse Healthcare Providers for reasonable travel, meal and accommodation expenses in line with applicable local laws and in compliance with the Principals regulations and standards.
- The Company may not pay an honorarium fee to a Healthcare Provider for simply attending an event.
- The Company may not sponsor the attendance of a specific individual to any third party Healthcare Provider training, conferences, and similar education events relating to the Products supplied by the Principal in line with applicable local laws and in compliance with the Principals regulations and standards.
- The Company may not directly support Healthcare Providers to attend third-party conferences or other similar events on Principal’s behalf in line with applicable local laws and in compliance with the Principals regulations and standards.

Competition

- The company seeks to outperform competition fairly and honestly. The Company seeks competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, processing trade secret information that was

obtained without the owners’ consent or inducing such disclosures by past or present employees or any other person of other companies is prohibited.

- Each employee shall endeavor to respect the rights if and deal fairly with the company’s customers, suppliers, competitors, and employees.
- No employee shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misinterpretation of material facts, or any other illegal trade practices.

Record-keeping, Financial Controls and Disclosures

- The company requires honest, accurate and timely recording and reporting of information to make responsible business decisions.
- All business expense accounts shall be documented and recorded accurately in a timely manner.
- All of the company’s books, records, accounts and financial statements shall be maintained in reasonable details, shall appropriately reflect the company’s transactions, shall be promptly disclosed in accordance with the applicable laws and regulations and shall confirm both to applicable legal requirements and to the company’s system of internal controls.
- Business records and communications often become public, and avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that may be misunderstood. This applies equally to email, internal memos, and formal and informal reports.

Records shall always be retained or destroyed according to the company's retention policies.

7 Outside Employment, Work, or Activities

Outside Employment, Work, or Activities

- Employees shall not conduct any outside employment activity during normal work hours or use Company premises or resources, supplies, or equipment for personal business.
- The employee may not, directly or indirectly, use the employee's position for his or her own private gain or that of any other person.
- In order to achieve high quality of work, all employees of the Company shall use due care and diligence in fulfilling the functions of their position and shall be responsible for improving skills, knowledge and competency required for their individual position and level of responsibility.

Dealing with Social Media

- Employees are not authorized to speak on behalf of the Company through social media channels, regardless of whether they are using a Company or personal device.
- Employees may use social media, including blogs, discussion forums, and social networks for the Company related business purposes only when allowed by authorized personnel, and only as long as such usage and communications comply with the Code of Conduct.