



SCIENTIA

Scientia Lifecare

Code of Business Conduct & Ethics





Message from the CEO

Dear Colleagues,

At Scientia Lifecare, our mission is rooted in a profound sense of responsibility—to the patients who depend on our products, to the healthcare professionals who trust our integrity, and to the society that expects us to act with transparency and fairness. We are proud to be a company committed to bridging science and well-being. This mission cannot be realized without a strong foundation of ethics and compliance.

This Code of Business Conduct and Ethics reflects who we are and how we operate. It is not just a set of rules—it is a reflection of our values. Whether you are managing supplier relationships, engaging with health authorities, engaging healthcare professionals, or supporting patients, each of us has the duty to act with honesty, respect, and accountability.

I urge you to read this Code thoroughly and use it as a guide in your daily decision-making. Adhering to its principles is essential not only to our success but also to our credibility as a responsible healthcare company in Pakistan. If you ever face an ethical dilemma or witness conduct that does not align with our values, I encourage you to speak up. Scientia provides a safe and respectful space to voice concerns, and we are committed to listening.

Let's continue to build a culture we can be proud of—one where ethics are never compromised, and where the well-being of patients is always our priority.

With integrity,

Dr. Syed Maaz Ahmed
Chief Executive Officer





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Introduction

Scientia Lifecare (Pvt.) Ltd. is committed to operating as a responsible, ethical, and compliant organization in the healthcare sector. Our work directly impacts human lives, and we therefore hold ourselves to the highest standards of conduct in all aspects of our business. This Code of Conduct serves as a framework for the decisions and actions of every individual affiliated with Scientia—employees, leadership, contractors, and third-party partners.

We comply with the laws and regulations applicable in Pakistan, including the Drug Regulatory Authority of Pakistan (DRAP) Act, as well as international standards that govern the pharmaceutical and life sciences industry. This document defines how we conduct business with integrity, respect, and accountability, both within the organization and in our external engagements.

The Code is not exhaustive; rather, it outlines the principles that guide ethical behavior and helps us navigate complex and sensitive situations. It should be read in conjunction with applicable laws, internal policies, and specific procedures within the company.

By committing to this Code, we each uphold Scientia's reputation as a trusted healthcare partner that puts patients first.

Reference documents:

The Drugs Act, 1976

Drug Regulatory Authority of Pakistan Act, 2012

Advertisement of Therapeutic Goods Guidelines 1st Edition

Prevention of Corruption Act, 1947

IFPMA Code of Practice 2019





Our Values and Ethical Foundations

Our ethical framework is built upon four foundational principles: integrity, patient-centricity, compliance, and transparency. These values shape our culture and inform every business decision we make.

- **Integrity** means doing the right thing—even when no one is watching. We are honest, responsible, and consistent in our actions. We avoid shortcuts and act according to our professional and moral standards.
- **Patient-Centricity** places the health, dignity, and safety of patients at the center of all we do. We strive to expand access to quality care, especially for those affected by rare and hard-to-treat conditions, ensuring our actions always serve patient well-being.
- **Compliance** ensures that we follow all applicable laws, regulatory requirements, and internal policies. This includes DRAP regulations, import and distribution procedures, pharmacovigilance requirements, and documentation standards. Compliance protects our ability to serve patients and to grow sustainably.
- **Transparency** drives us to communicate clearly and openly with regulators, stakeholders, and each other, thereby building and maintaining trust. Transparency in decision-making and record-keeping prevents misunderstandings and protects the integrity of our business.

These values are reinforced through leadership example, internal communication, training, and accountability at all levels of the organization.





Business Integrity

Business integrity is at the heart of everything we do. It requires more than simply following the law; it means upholding a standard of conduct that builds trust with patients, healthcare professionals, regulatory bodies, and the public.

Every action we take should reflect our commitment to fairness, transparency, and ethical behavior. We expect our employees to be honest and responsible in their professional dealings, to comply with internal policies and industry regulations, and to report any instance where integrity may be compromised.

This also includes financial honesty—accurate recordkeeping, truthful reporting, and the avoidance of misleading or deceptive practices. We do not permit falsification of records, manipulation of accounts, or misrepresentation of company performance. Transparency in communication and the duty to report errors or omissions promptly are essential.

Additionally, our interactions with healthcare professionals must be grounded in science and medical ethics—not in promotional tactics that could bias clinical judgment. Sales and marketing efforts must be supported by verified data and must respect local regulatory guidelines.

Business integrity means that Scientia operates as a trusted organization—internally, with partners, and in every market we serve.





Anti-corruption and Improper Advantage

At Scientia, we maintain a zero-tolerance stance on corruption. Bribery and corruption, whether direct or indirect, are not only illegal—they erode public trust, distort healthcare outcomes, and contradict our core values.

Employees must not, under any circumstances, offer or accept bribes or engage in activities that could be interpreted as attempts to influence decisions unfairly. This includes cash payments, gifts, travel, entertainment, or other benefits intended to secure preferential treatment or inappropriate advantage.

Corruption can take many forms:

- Offering incentives to health officials to fast-track approvals
- Providing luxury items or entertainment to influence procurement decisions
- Making “facilitation payments” to accelerate customs or administrative processes

Such practices, even if common in certain business environments, are not tolerated at Scientia. We are committed to maintaining full compliance with Pakistan’s Prevention of Corruption Act, the DRAP Act, and any other applicable anti-bribery legislation.

Scientia requires all employees to disclose any situation that may raise a concern. Suspected violations will be investigated thoroughly and may lead to disciplinary action, including legal consequences.





Gifts, Hospitality, and Entertainment

At Scientia, we recognize that appropriate and modest gestures—such as gifts or hospitality—can play a role in building professional relationships. However, these actions must always be guided by integrity, transparency, and compliance with applicable laws and internal standards. Any gift, hospitality, or entertainment must be free of any intent to improperly influence decisions, gain an unfair business advantage, or create a perception of impropriety.

We strictly prohibit offering, promising, soliciting, or accepting gifts or hospitality that:

- May be considered excessive or lavish
- Are given in exchange for, or with the expectation of, favorable treatment
- Could be construed as a bribe or create a conflict of interest

Examples of permitted items:

- Token gifts of modest value, such as promotional items or seasonal greetings, in line with local customs
- Meals or refreshments provided during business meetings, provided they are reasonable in cost and frequency
- Hospitality offered as part of a legitimate business or scientific engagement (e.g., educational events)

All such engagements must be:

- **Pre-approved** where required, by the executive management
- **Documented** clearly, with details of purpose, recipient, and cost
- **Compliant** with DRAP and public sector procurement rules, which prohibit undue influence or promotional inducements

Any uncertainty about the appropriateness of a gift or invitation should be discussed with a line manager or the executive management prior to acceptance or offer.





Dealing with Government Officials

Scientia's operations often involve collaboration with government bodies—whether in regulatory, healthcare, or procurement settings. We hold these relationships to the highest standard of integrity and professionalism.

Government officials, including those working within health departments, regulatory agencies (like DRAP), public hospitals, or ministries, must be treated with full respect for legal boundaries and ethical standards. Under no circumstances may Scientia employees or third-party representatives attempt to:

- Influence the decision-making of a public official through improper payments, benefits, or personal favors
- Circumvent official procedures or timelines using informal arrangements
- Misrepresent facts or omit relevant information during regulatory submissions, product registration, or tender applications

All communication with government authorities must be:

- Accurate, factual, and fully documented
- Reviewed and approved, where appropriate, by executive management
- Conducted with proper record-keeping and audit trails, particularly in sensitive areas such as medicine pricing, product licensing, or pre-approved access

Even the perception of preferential access or favoritism can damage Scientia's reputation and legal standing. Employees engaging with government stakeholders must disclose any personal relationships or previous affiliations that could be seen as a conflict of interest.





Patient-centric Responsibility

Our work directly impacts patients' lives, and as such, every decision we make must prioritize patient health, safety, dignity, and access to care. We strive to deliver high-quality, safe, and effective products that meet real clinical needs—especially in areas of high unmet medical demand such as rare diseases and oncology.

As part of our commitment to patient-centered care, we:

- Collaborate transparently with health authorities to ensure timely access to therapies through legal and ethical pathways, including named-patient programs
- Respond promptly to product quality complaints and adverse event reports, in accordance with pharmacovigilance requirements
- Communicate clearly and responsibly with healthcare professionals and patients, avoiding any misleading or promotional claims not backed by scientific evidence
- Maintain compliance with all DRAP regulations related to product registration, labeling, distribution, and importation

Patient-centricity is not just a value—it is an operational standard that applies across all departments, from regulatory affairs to commercial functions, from supply chain to medical affairs.



Working with Business Partners

Scientia Lifecare's reputation is closely tied to the conduct of its business partners. We expect our suppliers, distributors, consultants, and other third-party collaborators to demonstrate the same level of ethical behavior and legal compliance that we expect of ourselves.

Before engaging with any partner, we conduct thorough due diligence to assess their legal standing, past performance, and alignment with our Code of Conduct. This may include reviews of ownership, financial stability, conflicts of interest, and any history of regulatory or legal violations.

All contracts must contain specific clauses addressing:

- Compliance with anti-corruption and anti-bribery laws
- Respect for confidentiality and data protection
- Commitment to human rights, labor standards, and environmental sustainability

Our business partners are subject to monitoring throughout the course of the relationship. Scientia reserves the right to conduct audits or request additional documentation at any time, particularly in sensitive transactions involving public tenders, or international imports.

Any partner found to be in violation of these principles may have their contract suspended or terminated. Scientia will also report misconduct to appropriate authorities when required.





Conflict of Interest

A conflict of interest exists when an individual's personal interests—or those of their family members or associates—interfere with, or appear to interfere with, their ability to act in the best interests of Scientia.

Conflicts can take many forms, including:

- Having a financial stake in a supplier or competitor
- Receiving gifts or incentives from third parties in exchange for preferential treatment
- Hiring or awarding contracts to relatives or friends
- Holding outside jobs or consulting positions that affect objectivity at Scientia

All actual, potential, or perceived conflicts must be disclosed immediately to the employee's supervisor or the executive management. Scientia will assess the situation and determine whether the individual should recuse themselves from certain decisions or if further action is required.

Employees are also encouraged to speak up if they observe behavior by colleagues or third parties that may indicate a conflict of interest, even if the individual involved does not recognize it as such.





Handling of Company Assets and Information

Scientia provides its employees and partners with a wide range of tools, resources, and data to support their work.

All assets must be used responsibly, for legitimate business purposes only. Personal use of company property should be minimal, and employees must take precautions to avoid loss, damage, or misuse.

Confidential information includes, but is not limited to:

- Strategic plans
- Product formulations and pricing
- Financial data
- Regulatory submissions
- Patient or physician records (where applicable)

This information must never be shared with unauthorized parties, including competitors, family members, or the public. Employees must also avoid discussing sensitive matters in public places or unsecured digital environments.

Scientia adheres to all applicable data protection laws, including those relating to electronic communication, archiving, and cybersecurity. Employees must report any known or suspected breaches of information security immediately to the executive management.





Human Rights and Respect in the Workplace

At Scientia, we are committed to creating a workplace culture grounded in dignity, fairness, and respect for all individuals. We believe that a positive and inclusive work environment is fundamental to delivering our mission and to the well-being of our employees.

We uphold internationally recognized human rights, including those outlined in the United Nations Universal Declaration of Human Rights and the International Labour Organization's core conventions. These principles inform our employment practices and workplace policies.

We do not tolerate:

- Discrimination based on race, gender, age, religion, disability, marital status, sexual orientation, or any other protected characteristic
- Harassment or bullying of any kind—verbal, physical, psychological, or sexual
- Child labor, forced labor, or any form of exploitation
- Unsafe or unhealthy working conditions

All employees are expected to contribute to a professional and respectful work environment. This includes active participation in promoting diversity and inclusion, supporting equal opportunity, and addressing behavior that is not aligned with our values.

Anyone who experiences or witnesses misconduct is encouraged to report it to the executive management, with full assurance of non-retaliation.





Speaking Up and Reporting Misconduct

Creating a culture of integrity requires everyone to take responsibility for protecting Scientia's values. We expect our employees, contractors, and business partners to report any actual or suspected violations of this Code, other company policies, or applicable laws.

Examples of reportable concerns include:

- Bribery or corruption
- Fraud, theft, or embezzlement
- Harassment or discrimination
- Unsafe working practices
- Unlawful marketing or promotion of products

To support open communication, Scientia has established multiple confidential reporting channels, including:

- Direct report to a supervisor or line manager
- Contact with executive management
- Email to **info@scientialifecare.com**

We have a strict non-retaliation policy. No one will be penalized or subject to retaliation for raising a concern in good faith, even if the concern is later found to be unsubstantiated. All reports will be reviewed promptly, impartially, and with appropriate follow-up.

Speaking up is not only a right—it is a professional duty.

Compliance Implementation and Monitoring

Ethical conduct at Scientia is supported by a strong framework, including policies, training, monitoring, and leadership accountability.

Key elements include:

- Mandatory Code of Conduct training during onboarding and periodic refreshers
- Internal audits to assess compliance with financial controls, documentation standards, and regulatory procedures
- Investigations of misconduct
- Leadership commitment to role-modeling ethical behavior and ensuring that expectations are communicated and enforced at all levels

Scientia also monitors industry developments and updates this Code as necessary to reflect changes in legal requirements, DRAP regulations, or ethical best practices.



Conclusion

This Code of Conduct represents more than a document—it is a promise to ourselves, to each other, and to the patients and communities we serve. Upholding these principles enables us to do business with integrity, gain the trust of partners and regulators, and make a meaningful difference in healthcare.

We count on every member of the Scientia team to live our values in action, to speak up when something is wrong, and to help build a company where ethics are central to our success.

Thank you for your commitment to ethical excellence.



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Appendix

Code of Business Conduct & Ethics

Acknowledgement

I, the undersigned, hereby acknowledge that I have received, read, and understood the Code of Business Conduct & Ethics Policy of Scientia Lifecare (Pvt.) Ltd. I understand that this document outlines the standards of behavior expected of all employees, partners, and stakeholders, and that it reflects the company's values and commitment to ethical business practices.

I affirm my commitment to comply with the principles and obligations described in this Code, including but not limited to:

- Acting with integrity, professionalism, and honesty in all business dealings;
- Complying with all applicable laws, including anti-corruption, anti-bribery, and DRAP regulations;
- Reporting any concerns or potential violations through the appropriate channels in good faith;
- Respecting the rights of others and promoting a safe, fair, and inclusive workplace;
- Protecting confidential information and company resources;
- Avoiding conflicts of interest and acting in the best interest of Scientia Lifecare.

I understand that failure to comply with the Code of Conduct may result in disciplinary action, up to and including termination of employment, contract cancellation, or legal consequences, depending on the severity of the breach.

By signing this form, I confirm my acceptance of the Code and my agreement to uphold its principles in all my professional interactions related to Scientia Lifecare.

Signature: _____

Date: _____

Name: _____

Designation: _____

Organization: _____

