

POLICY



Title: Code of Conduct

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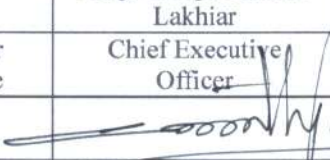
	Prepared	Reviewed	Approved
Name:	Umer Farooq	Elishba John	Brig. Tarique Quadir Lakhari
Designation:	Manager P&C	General Manager People & Culture	Chief Executive Officer
Signature/ Date:			

Table of Contents

Message From CEO.....	3
1. Our Core Principles	4
1.1. Associates (Employees).....	4-6
1.2. Donors & Supporters.....	6-10
1.3. Society.....	10
2. Misconduct	11
3. Applicability	11
4. Breaches	11
5. Modification & Interpretation of the Policy	11

Message from CEO

Dear Associates,

Sindh Integrated Emergency & Health Services (SIEHS) aims to champion dignity and choice for the underserved, focusing on health through direct involvement, aspiring to derive scalable, sustainable and systemic change in Pakistan.

We aspire to create a high social impact and prove that change can be achieved in a sustainable way.

Our Code of Conduct (COC) reflects our commitment to meet the expectations of our stakeholders as a responsible social enterprise and contains the fundamental principles and rules concerning ethical business conduct. We believe that how we achieve our results is as important as the achievement itself.

The COC forms an integral part of terms of employment for all employees. Sindh Integrated Emergency & Health Services insists on full compliance and will not tolerate any misconduct.

We thank you for your support and commitments to our code of conduct. Our combined efforts will enable us to make a better impact to the society and strengthen our reputation.

Chief Executive Officer

1. Our Three core principles:

1.1. Associates (Employees):

We treat them fairly and respectfully

1.2. Donors & Supporters:

We are committed to outstanding and sustainable impact performance with integrity. We strive to be a trusted partner

1.3. Society:

We aspire to serve the society and the communities we are embedded in

When in doubt ask yourself:

- I. Will my conduct allow us to maintain the trust of all our stakeholders?
- II. Have I thought about the impact on those who will be affected by my conduct?
- III. Would I be comfortable if someone treated me the same way?
- IV. Would I be comfortable if my conduct appeared in the media?
- V. Is my conduct legal and compliant with SIEHS policies?

1.1. Associates:

We treat our associates fairly and respectfully



1.1.1. Fair Working Conditions:

We commit to provide our associates fair and competitive wages based on performance and ethical conduct.

We protect associates from unfair or unethical working conditions, including bonded, forced or child labour, or any unsafe working conditions.

1.1.2. Personal Appearance:

The organization's attire in the office is formal business wear. Whether at SIEHS's offices or stations, you are expected to adopt a modest and professional standard of business dress. It is essential that all staff portray professionalism in their attire at all times. Furthermore, as SIEHS employees often work on ground, within local communities, you must always respect the local culture and traditions in your personal appearance. Fridays will be casual dress day. e.g. shalwar kameez, kurta, T-shirt (Collar) etc. No jeans, shorts, chappal without back strap (for men).

	In office	On site
	<ul style="list-style-type: none"> ▪ Loose Kurta ▪ Loose-fit pants / shalwar ▪ No sleeve-less ▪ Low slits ▪ No Jeans 	<ul style="list-style-type: none"> ▪ Dupatta ▪ Loose Kurta ▪ Loose-fit pants / shalwar ▪ Below the elbow sleeves ▪ Low slits on Kameez / Kurta ▪ No Jeans ▪ No expensive jewelry
	<ul style="list-style-type: none"> ▪ Dress pants ▪ Formal shirt ▪ Blazer (especially for meetings) ▪ Decent Shalwar Kameez ▪ No jeans 	<ul style="list-style-type: none"> ▪ Dress pants and shirt ▪ Decent Shalwar Kameez

If in any doubt, please check with P&C or your manager on what constitutes acceptable business wear.

1.1.3. Communication:

SIEHS values timely and professional communication, both verbal and written. All emails should be responded to within 24 hours, in a professional tone. Training and development may be provided to employees if requested or on needs basis.

1.1.4. Time Keeping:

Employees who are unable to attend work (or expect to be late) must notify their Manager no later than 10:00 a.m. on the day in question and justify their absence. You should always inform either your Manager or subordinate (as appropriate) if you leave the office during normal working hours (e.g. for a meeting or for lunch). You need to ensure that you can always be located and contacted easily when out of the office - whether on a business, personal trip or if you are away for any other reason.

1.1.5. Diversity:

We treat our associates fairly, equally and respectfully. We expect associates to demonstrate respect toward each other and we do not tolerate any form of harassment or discrimination. We seek to create work environment where associates regardless of their backgrounds can contribute fully. We appreciate the diversity and individuality of our associates and do not discriminate based on personal characteristics such as nationality, gender, age, ethnicity, religion, sexual orientation, socio-economic background, education or disability.

We believe a diverse workforce is critical to our success. We therefore attract, develop and retain highly talented people with diverse backgrounds and mindsets.

1.1.6. Associate Appraisal and Development:

The evaluation of an associate's performance considers both achievement on objectives as well as adherence to the SIEHS Values and Behaviors. Constructive dialogue between the associate and supervisor on goals, priorities and development needs is an essential part of the SIEHS' Performance Management Process.

We offer opportunities for our associates to develop, grow and continuously improve individual skills to strengthen the competencies of SIEHS as a whole.

1.1.7. Freedom of Opinion and Speech:

We recognize that every employee is entitled to freedom of opinion expression and speech, provided these do not interfere with the associate's ability to fulfill the job responsibility or conflict with Code of Conduct.

1.2. Donors & Supporters:

We are committed to outstanding and sustainable performance with integrity.

1.2.1. Financial Integrity:

We do not compromise our financial integrity. Financial risks and operational processes must be appropriately reviewed, approved and followed such that financial integrity is maintained in all transactions.

We maintain effective controls over financial reporting to ensure a complete and accurate record of our financial transactions.

1.2.2. Business Continuity:

We believe that business continuity management is critical for our stakeholders, and is part of responsible management practice. In the event of an emergency or significant business disruption, we are committed to doing our utmost to ensure uninterrupted services.

1.2.3. Safeguarding Assets:

We work to protect assets of SIEHS against threats. This applies to our associates, reputation, information, property and other assets.

We properly use and maintain assets of SIEHS and ensure that they are protected from misuse, loss, theft and waste. All SIEHS assets must be used for legitimate business purposes.

We protect our investments in intangible assets by obtaining, enforcing and defending intellectual property (IP) rights and by maintaining confidentiality of sensitive information. We also respect legitimate IP rights of others.

IP created, developed or obtained by associates and related to their employment belongs to SIEHS.

1.2.4. Information security:

We protect the confidentiality, integrity and availability of critical information, regardless of its form and location.

1.2.5. Conflict of interest:

The nature of the organization's work involves being entrusted with confidential information concerning the Group, its employees, customers and alliance partners. It is important that such information is treated with the care it warrants and which is required of the company by the authorities to which the organization reports.

All employees of SIEHS are expected to avoid personal activities and financial interests which could conflict with the responsibilities to the company. Employees must not seek gain for themselves or others through misuse of their positions. Sindh Integrated Emergency & Health Services respects the rights of employees to manage their personal affairs and investments but expect them to avoid any situation that may involve a conflict between their personal interests and the interests of the organization.

A conflict of interest is a situation where an employee has an interest that may conflict with his/her ability to act in good faith and in the best interest of the company.

Employees must disclose actual or potential conflicts of interest to their supervisor. Newly hired associates are requested to disclose any actual or potential conflicts of interest before they begin employment.

1.2.6. Some examples of conflict of interest:

- i. Outside employment: During working hours, associates are expected to devote full time and attention to the business and the affairs of the company.
If an associate wishes to engage in employment or business activity outside his/her employment with the company, it must first be disclosed to his/her manager and Head of Human Resources, the nature and extent of the proposed employment or business activity, and obtain the CEO's written approval. Approval will only be withheld if the company reasonably determines that the proposed outside employment or business activity could conflict or compete with the interests of the organization, or could negatively affect your job performance or attendance.
- ii. Use of the company's funds and property: Associates must be conscientious and scrupulous in the handling of funds and property belonging to the organization, and must always avoid any form of financial impropriety. Associates must not use, or permit the use of, SIEHS property or resources for anything other than approved SIEHS business or activities.
- iii. Unauthorized hiring of close relatives
- iv. Unauthorized use of company's other peripherals for personal purposes.

All associates must comply with SIEHS Conflict of interest policy.

(A Separate detailed policy for conflict of interest explaining various examples of conflict of interest, confirmation by all associates that they understand the meaning of conflict of interest and no conflict of interest situation (s) exist between him/her and SIEHS. This disclosure is to be part of employment contract for all current and future associates).

1.2.7. Anti-Bribery and Corruption:

We do not tolerate any form of internal or external bribery or corruption.

We do not bribe any public official or private person and we do not accept any bribes.

1.2.8. Commitment to all Laws and Regulations:

We comply with all laws and regulations applicable to our activities. We also implement and comply

with our internal policies.

1.2.9. Third party integrity:

We expect third parties with whom we work to comply with the law, to adhere to ethical business practices, and to observe our standard requirements concerning labor, health, safety, environmental protection and management systems.

1.2.10. Harm to business and reputation:

All associates must refrain from engaging in conduct that could adversely affect SIEHS' business or reputation. Such conduct includes, but is not limited to:

- I. Publicly criticizing SIEHS, its management or its employees; or
- II. Engaging in criminal conduct or other behavior that could harm the company's business or reputation.

1.2.11. Gifts or 'kickbacks':

Associate must never accept any 'kickbacks' or loans from business transaction partners. He/she must not accept any gifts of substantial value. For more details refer to the policy for gifts and kickbacks'.

1.2.12. Anti-Harassment Policy:

SIEHS believes in equal-opportunity and shall be committed to providing a work environment free of discrimination and harassment. Workplace harassment means persistent and unwelcome conduct or actions towards workplace associates. The most productive and satisfying work environment is one in which work is accomplished in a spirit of mutual trust and respect.

SIEHS views harassment and associated behavior to be among the most serious breaches of work place ethics. Consequently, appropriate disciplinary or corrective action can be expected, if any associate is found guilty.

Harassment includes but is not limited to:

- I. Inappropriate remarks, slurs, jokes, taunts, or suggestions about a person's body, clothing, race, national or ethnic origin, colour, religion, age, sex, marital status, family status, physical or mental disability, sexual orientation, pardoned conviction, or other personal characteristics
- II. Sexual remarks, invitations, or requests, displays of sexually explicit, sexist, racist, or other offensive or derogatory material
- III. Sexual advances or requests for sexual favours where submission or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual
- IV. Written or verbal abuse or threats or slander
- V. Practical jokes that embarrass or insult someone
- VI. Bullying of any form
- VII. Leering (suggestive staring) or other offensive gestures
- VIII. Inappropriate physical contact, such as patting, touching, pinching, hitting

- IX. Patronising or condescending behaviour
- X. Humiliating an employee in front of co-workers
- XI. Abuse of authority that undermines someone's performance or threatens her/his career
- XII. Vandalism of personal property
- XIII. Physical or sexual assault

1.2.13. Relationships between coworkers:

Any sexual or romantic relationship of a consensual nature may create conflicts of interest, abuse of authority, favouritism and unfair treatment and accordingly any such consensual relationships between employees are prohibited. No employee shall enter into a consensual relationship with any other employee, no matter the duration or nature of such relationship. Any employee found to be in violation of this prohibition shall be subject to disciplinary action, up to and including termination of service.

1.2.14. Protection from Sexual Exploitation and Abuse and Harassment Policy:

The SIEHS Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH) policy is a comprehensive framework designed to uphold safety, dignity, and respect in the workplace. With a zero-tolerance stance on SEAH, it enforces strict disciplinary measures and legal actions against offenders. Key elements include mandatory training, accessible reporting mechanisms, and a survivor-centered approach to address incidents effectively.

The policy applies to all stakeholders, including employees, volunteers, contractors, and beneficiaries, ensuring a broad scope of protection. It emphasizes preventive measures such as thorough background checks, awareness programs, and alignment with global standards. The reporting framework ensures confidentiality and transparency through digital forms and email systems, enabling fair and unbiased investigations.

Complaints are addressed by a dedicated review committee, followed by comprehensive investigations, risk assessments, and decisive actions. Survivors are supported through access to counseling, legal assistance, and medical services, creating a safe and encouraging reporting environment. Regular monitoring, periodic training, and mandatory adherence through cooperation agreements reinforce the policy's effectiveness.

This framework highlights SIEHS's unwavering commitment to fostering an abuse-free, inclusive, and respectful organizational culture. For further details, refer to the Protection from Sexual Exploitation and Abuse and Harassment Policy, Document # SIEHS-HR-PL-25.

1.2.15. Zero Tolerance Policy:

The SIEHS Zero Tolerance Policy is a strict guideline defining unacceptable behaviors and actions that violate the organization's Code of Ethics. It categorizes violations into critical misconduct, serious misconduct, major infractions, and minor infractions, each with corresponding disciplinary measures. Critical misconduct, such as physical violence, theft, or drug possession, results in immediate termination, while serious misconduct, including improper handling of patients or insubordination, leads to a final warning and termination upon repetition. Major infractions and minor violations are addressed

progressively, starting with warnings and escalating to termination for repeated negligence. The policy emphasizes accountability, ensuring fair enforcement through a structured approach involving responsible authorities. It mandates training, dissemination, and monitoring by management teams to ensure consistent implementation across all locations. Performance appraisals are directly impacted by disciplinary actions, reinforcing compliance and ethical conduct. The policy highlights the organization's commitment to maintaining professionalism, safety, and ethical standards while reserving management's right to modify decisions as necessary. For further details, refer to the Zero Tolerance Policy document.

This Policy has been introduced to eradicate any wrongful behaviour, raise general awareness of the subject among all employees and enable employees who believe they have been the subject of harassment to seek support and/or guidance - and, if appropriate, to take further action. Issues relating to harassment can always be referred by an employee to their Manager or P&C so that appropriate action is taken as per the P&C policies outlined.

1.3. Society:

We aspire to be a social enterprise that serves society and people through delivering social goods and service in a sustainable manner

1.3.1. Citizenship:

By actively contributing to social, ecological, cultural, and other projects and programs, we strive to contribute to the solution of societal problems.

1.3.2. Transparency:

We are open and transparent with respect to our business principles and practices and comply with applicable laws and regulations.

1.3.3. Human Rights:

We strive to ensure that activities within our sphere of influence do not negatively impact fundamental human rights, as set out by the United Nation's Bill of Rights and the core conventions of the International Labor Organization, either directly or through our business relations.

1.3.4. Health, Safety and Environment:

We strive to comply in all aspects of occupational health, safety and environmental protection. We systematically identify and manage health, safety and environmental risks in our activities and services.

We make efficient use of natural resources and minimize the environmental impact of our activities and products over their life cycle.

1.3.5. Data privacy:

We respect the privacy rights of our associates and other stakeholders. We inform individuals of collection and processing of their personal data, allowing them to make informed decisions and exercise their rights. We collect and process personal data for specific and legitimate business purposes only and secure such data against unauthorized access.

2. Misconduct:**How to report potential misconduct?**

Associates who report potential misconduct or who provide information or otherwise assist in any inquiry or investigation of potential misconduct will be protected against retaliatory action.

Misconduct is any conduct that violates the SIEHS Code of Conduct and pertinent policies and/or external law or regulation.

All associates are required to bring potential misconduct to the attention of SIEHS. Associates with knowledge of potential misconduct, or associates receiving a report of misconduct, must notify their manager or Head of Human Resources or written complaint to the above; without further disseminating the information.

There are five ways to report a misconduct, formally through the last two channels;

- 1) Direct Supervisor
- 2) Head of Department
- 3) People & Culture Manager
- 4) General Manager People & Culture, personally or at people@siehs.org
- 5) Email to complaints@siehs.org

3. Applicability:

This SIEHS Code of Conduct is applicable to all operations and associates of the organization.

4. Breaches:

Breaches of the SIEHS Code of Conduct will not be tolerated and can lead to disciplinary action up to and including termination of employment.

5. Modification and Interpretation of the Policy:

The Company reserves the right to modify/terminate this policy, in whole or in part, at any time. This policy will be administered and interpreted by the Head of Human Resources whose interpretation will be final. In special cases company's CEO can make exceptions to this policy.