

Code of Conduct

It is a fundamental policy of the company to conduct its business with honesty, integrity and in accordance with the highest professional, ethical and legal standards. The company has adopted a comprehensive Code of Conduct (codes) for members of the Board of Directors and employees. The code defines acceptable and unacceptable behaviour, provides guidance to Directors/ employees in specific situations that may arise and foster a culture of honesty, accountability and high standards of personal and professional integrity

Salient Features of the Code for Directors

Conflict of Interests

Each Director must avoid conflict of interest between the Director and company and its associated or subsidiary undertaking(s). Any situation that involves, or may reasonably be expected to involve, a conflict of interest with the company, should be disclosed promptly.

Corporate Opportunities

Directors are prohibited from taking personal opportunities related to the company's business, using company's property, information or position for personal gain or competing with the company for business opportunities.

Confidentiality

Directors must maintain confidentiality of the information entrusted upon them by the company and its associated or subsidiary undertaking(s), except when disclosure is authorized by the Chairman of the Board or legally mandated.

Honesty, Integrity and Fair Dealing

Directors must act honestly and fairly and exhibit high ethical standards in dealing with all stakeholders of the company.

Compliance with Laws, Rules and Regulations

Directors shall comply with laws, rules and regulations applicable to the company, including but not limited to the Companies Ordinance 1984, Listing Regulations of the Stock Exchanges and Insider Trading laws.

Encouraging Reporting of Possible Illegal or Unethical Behaviour

Directors should take steps to ensure that the company promotes ethical behaviour, encourages employees to talk to supervisors, managers and other appropriate personnel when in doubt about the best course of action in a particular situation. Encourage employees to report violation of laws, rules, regulations, company policies and procedures or code of conduct to appropriate personnel and inform them that the company will not allow any retaliation for reports made in good faith.

Trading in Company Shares

Certain restrictions/ reporting requirements apply to trading by Directors in company shares. Directors will make sure that they remain compliant with these statutory requirements.

Compliance Procedures

Directors should disclose any suspected violations of this code promptly in the immediate subsequent meeting of the Board of Directors.

Specific Guidelines for Employees

Conflict of Interests

Employees/ trainees must not engage in activities or transactions which may give rise or seen to have given rise to conflict between their personal interests and the interest of the company.

Confidentiality and Disclosure of Information

Employees/ trainees are expected to safeguard confidential information about the company activities and must not, without authority, disclose such information to the press, outside source, or employees/ trainees who are not entitled to such information.

Political Contribution

No funds or assets of the company may be contributed to any political party or organization or individual who either holds public office or is a candidate for public office except where such contribution is permitted by law.

Bribes and Commercial Payments

An employee/ trainee must not give or receive bribes or other payments, which are intended to influence a business decision or compromise independent judgment nor any employee/ trainee give money to obtain business for the company or receive money for giving company business to an outside agency.

Proper Recording of Funds, Assets, Receipts and Disbursements

All funds, assets, receipts and disbursements must be properly recorded in the Books of the Company.

Agreements with Agents, Sales Representatives or Consultants

Agreements with agents, sales representatives or consultants should state clearly the services to be performed, the amount to be paid and other relevant terms and conditions.

Relations and Dealings with Suppliers, Consultants, Agents, and Other Third Parties

SML's relations and dealings with suppliers, consultants, agents, and other third parties should at all times be such that SML's integrity and reputation is not damaged, if details of the relationship or dealings were to become public knowledge.

Health, Safety & Environment Policy

Every employee/ trainee at work must take reasonable care for the health and safety of him/ herself and others, including visitors, who may be affected by his/ her acts or omissions at work and cooperate in the company's efforts to protect the environment.

Smoking Policy

Smoking and exposure of workplace to tobacco poses serious health hazards to employees/ trainees besides potential risks of fire and explosions.

Other Employment, Outside Interests, Civic Activities

SML does not allow its employees/ trainees to take any part-time and/ or full-time second employment

during employees'/ trainees' engagement with the company.

Unsolicited Gifts

Accepting gifts that might place an employee/ trainee under obligation is prohibited. Employee/ trainee must politely but firmly decline any such offer and explain that in accordance with the company's instructions, they are unable to accept the offer.

Family Connections and Employment of Relatives

Any dealing/s between staff and outside organizations in which they have a direct, indirect or family connection must be fully disclosed to the management.

Company and Personal Property

An employee/ trainee must not take or use company property or property of another employee/ trainee without permission nor must the employee/ trainee use company property for private purposes without the management's permission.

Gambling

All forms of organized gambling or betting on the company's premises are forbidden.

Rumour Mongering & Gossiping

Rumour mongering, persuasive allegations, accusations and exaggerations with the purpose of negatively influencing and manipulating the minds and emotions of fellow employees/ trainees are strictly prohibited.

Harassment

It is the company's policy to promote productive work environment and not to tolerate verbal or physical conduct by any employee/ trainee that harasses, disrupts or interferes with another's work performance, creates an intimidating, humiliating, offensive or hostile environment.

Grievance Handling

SML strives to provide a fair and impartial process to its employees/ trainees and ensure timely resolution of their grievance.

Whistle Blowing

In order to enhance good governance and transparency, SML has introduced a Whistle Blowing Policy. The policy provides an avenue to employees/ trainees and vendors to raise concerns and report legal and ethical issues like fraud, corruption or any other unlawful conduct or dangers to the public or environment.

General Discipline

Every employee/ trainee must adhere to the company's rules of service and make sure that he/ she is familiar with them.

Reporting Violations/ Disciplinary Actions

Any violation of this code shall be promptly reported to the Human Resources department by any employee/ trainee having knowledge thereof or reasonable belief that such a violation has occurred.