

# CODE OF CONDUCT AND CONFLICT OF INTEREST

**Document Number:** ADMN/GL/CC/001

**Document History:** 1st Edition

**Effective Date:** 15-06-2021

Drug Regulatory Authority of Pakistan

Islamabad-Pakistan



#### 1. HISTORY

This is the first edition of this document.

#### 2. APPLICATION - Guideline for Regulators

This document is applicable to all the officers / officials of DRAP to explain the general provisions of conduct and interaction need to be followed while performing their professional duties at work as well as operating outside their offices and also sets out the practice for members of the Board, Committees, Experts, Consultants, Advisors, officials, trainers, internees and interims etc.

#### 3. PURPOSE

#### 3.1. This document is aimed:-

- 3.1.1. To sets out the values, standards and principles of ethics and behavior which apply to those working in the DRAP or involved in its activities,
- 3.1.2.To develop a professional and efficient working environment in the DRAP for development of mutual cooperation and trust of the employees towards their co-workers; enhance the esteem of DRAP and make efforts to protect the individuals as well as the organization from conflict of interest.
- 3.1.3. To provide guidance in identifying and handling potential and actual conflicts of interest involving the organization.



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#### 4. INTRODUCTION

- 4.1. Drug Regulatory Authority of Pakistan (DRAP) established under Drug Regulatory Authority of Pakistan Act, 2012 has endeavored to ensure that it maintains the highest professional standards of integrity, transparency and independence. DRAP works for effective coordination and enforcement of the Drugs Act, 1976 (XXXI of 1976) and to bring harmony in inter-provincial trade and commerce of therapeutic goods. The DRAP Act, 2012 provides functions for the Authority and empowers Authority to carry out its function, some of which may be delegated to its officers as deemed appropriate. The responsibility so assigned makes it imperative that such powers must be exercised properly maintaining high standards of integrity and transparency in relation to potential conflicts of interest.
- 4.2. The concept of conflict of interest recognizes that the judgment of even the most well-meaning persons may be impaired when their own interests, those of an institution with which they are affiliated, or those of a close associate, are affected. DRAP will organize its structure, management processes, and day-to-day activities so as to minimize the possibility that conflicts of interest will arise with respect to all matters within its jurisdiction. Where conflicts of interest do arise, it will be ensured that they are dealt with promptly and fairly.
- 4.3. The Code of Conduct is applied in good faith and interests of the entire drug regulatory network. The Code of Conduct and its active application supports the proper functioning of the Authority in the performance of its mandated role and responsibilities.
- 4.4. The Code should not be read as a set of rules, or the words should not be interpreted for their legal meaning. It is intended to simply convey the obligations and the behavior expected by all the Officers/ Officials of DRAP whether permanent or on contract or on contingent basis or on deputation or engaged by virtue of any other terms and conditions and to members of the Boards, Committees, experts, consultants, advisors while discharging their official duties.
- 4.5. This Code of Conduct and Ethics may be reviewed periodically and updated to reflect the changes occurring both within and outside DRAP.



#### 5. LEGAL REQUIREMENTS

5.1. In order to promote transparency, accountability, inclusiveness, and public confidence in all activities, Section 18 of the DRAP Act 2012 defines provision regarding non-existence of conflict of interest which requires as;

## "18. Conflict of interest.-

- (1) No person shall be appointed as CEO, Director, consultant, advisor, officer or employee of the Authority if he or she has any financial or professional conflict of interest.
- (2) No person shall be member of the Board or Director if he has immediate family members (parent, child, sibling or spouse) as senior officials or owners of concerns dealing in therapeutic goods.

#### 6. DEFINITIONS AND ACRONYMS

DRAP Employees	Include all the personnel working in the DRAP in any capacity or
	under any terms and conditions.

DRAP	Officer	A public servant / civil servant (BPS-17/RO-12 and above)				
(BPS-17 / R	O-12 and	appointed to a certain position at DRAP (including regular/				
above)		contract employees, deputationists etc.) to discharge the				
		functions of the Authority, endowed with powers appropriate to				
		his or her position.				

<b>DRAP Official</b>	A public servant / civil servant (BPS-16/RO-11 and below)
	appointed to a certain position at DRAP (including regular/
	contract employees, deputationists etc) to discharge the functions
	of the Authority.

<b>Public interest</b>	Means the public's rights and expectations with regard to
	impartial, fair and just decision-making and relevant actions in
	public service.



**Private interest** Means private economic or non-economic interest of persons in

service or their close relatives or other associates, which may

affect their decision making in the discharge of the official duties.

**Conflict of Interests** Situation in which an employee's private interests" interfere with

the proper discharge of his official duties because of the divided

loyalties. This may occur when the external or private interest

provides, directly or indirectly, a motivation or incentive to

influence the individual's conduct in exercising their duties and

responsibilities as an employee. This creates a risk that the

individual's judgment or actions could be, or could be seen to be,

unduly influenced by that external interest. "Conflict of interest"

includes both actual and apparent conflicts of interest.

**Defamation** An intentional false communication, either published or publicly

spoken, that injures another's reputation or good name.

**DRAP leadership** CEO, Directors, Additional Directors and officers In-charge of

DRAP field Offices and Laboratories.

**Immediate** Family (parent, child, sibling or spouse)

**Members** 

**Advantage** Refers to almost anything which is of monetary value including

a service or a favor.

Family member A Family Member is a parent, child, sibling or spouse of an

Individual.

**Senior officials** Senior officials, for the purposes of this document, means having

decision taking positions in the entity dealing with therapeutic

goods i.e. Chief Executive Officer, Managing Director,

Executive Directors, Board of Governors, Chief Operating

Officer, President, Shareholders etc.

Financial Conflict of A financial conflict of

interest

A financial conflict of interest, for the purposes of this document, is one where there is or appears to be opportunity for personal

financial gain, financial gain to family members, or where it

might be reasonable for an entity dealing with therapeutic goods,



to take the view that financial benefits might affect that person's actions / decisions or they might affect a decision of the Authority. This type of conflict also includes the financial relationships of an individual with entities dealing with therapeutic goods, such as stock ownership, shareholders or other ownership interests, etc.

## Professional conflict of interest

This type of conflict, for the purposes of this document, means having professional relationships with any entity dealing with therapeutic goods included but not limited to providing consultancy services, professional inputs & guidance for affairs related to regulations of therapeutic goods. These interests may also include any benefit or advantage, including, but not limited to, direct or indirect enhancement of an individual's career, or gain to immediate family.

#### 7. GOVERNING PRINCIPLES

- **7.1.** The Drug Regulatory Authority of Pakistan, its officers and officials, members of the Boards (Policy Board, Appellate Board, Registration Board, Central Licensing Board, Medical Devices Board etc.) Committees and Experts are working for the protection of public and animal health as envisaged in DRAP Act 2012.
- **7.2.** Following are the governing principles:-
  - 7.2.1. Commitment to Pakistan and its citizens
  - 7.2.2. Integrity
  - 7.2.3. Objectivity
  - 7.2.4. Respect for others
  - 7.2.5. Transparency
  - 7.2.6. Assure the highest personal standards of integrity, honesty and independence.
  - 7.2.7. Promote and acquire the spirit of faithfulness, trustworthiness and commitment to the goals of DRAP.

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7.2.8. Assure impartiality and discretion to applicants.



- 7.2.9. Weighing facts for the right course of action.
- 7.2.10. Sound decisions, without missing the details.

#### 8. GENERAL GUIDANCE FOR CODE OF CONDUCT

- **8.1.** All the employees shall be aware that they carry an obligation that their professional and personal conduct must not negatively impact on DRAP's standing and reputation.
- **8.2.** All employees must meet the standards of ethical behavior and accountability that DRAP promotes in its dealings with other organizations and individuals.
- **8.3.** The official procedures shall be carried out professionally, impartially, with integrity and in the best interests of the society at large, keeping in view the constitutional principles of policy.
- **8.4.** The customers and stakeholders shall be dealt fairly, recognizing their rights as citizens. Discrimination and partiality, either within DRAP or in dealings with people and organizations outside DRAP, may constitute violation of the constitutional fundamental rights of people.
- **8.5.** The name and powers of DRAP must be used with restraint, and with an awareness of their potential effect upon others. These must never be used to gain personal advantage (whether monetary or otherwise) or pursue personal issues.
- **8.6.** The official proceedings of DRAP must not be compromised or affected by any personal interest.
- **8.7.** The resources provided by DRAP must be used efficiently and effectively.
- **8.8.** The security of personalized information about the persons working with or dealing with DRAP must be a top priority.
- **8.9.** When confronted with an issue of ethics and conduct, they employees shall be obliged to consult the principles and guidance provided in this Code.



#### 9. OBLIGATIONS OF EMPLOYEES AND PERSONS CONCERNED

- **9.1.** The employment in DRAP demands a commitment from the officers/officials to practice certain values during the interactions within DRAP, with other public sector agencies, private organizations, individuals and the staff. These commitments include advancement of the public interest; acting ethically and with integrity; being fair, impartial and accountable; striving for excellence in our work, being tenacious and professional in our aims, respecting colleagues and working as a team.
- **9.2.** As an officer/official of DRAP, there is an obligation to be aware of and comply with this Code of Conduct and Ethics. By accepting and continuing employment with DRAP, employees must agree:
  - 9.2.1. To show sincerity and devotion towards their official duties.
  - 9.2.2. To be disciplined, punctual, and follow official timings of DRAP.
  - 9.2.3. Not to engage in personal or professional conduct that may bring DRAP into disrepute.
  - 9.2.4. To abide by the secrecy and confidentiality provisions of Section 31 of DRAP Act, 2012 and policies of DRAP.
  - 9.2.5.To fully and openly disclose their personal, financial and other interests to DRAP at the time of joining, to annually declare increase or decrease in assets, and to apprise DRAP of any significant changes in their personal or financial status.
  - 9.2.6. To ensure that the work habits, behavior and personal and professional relationships at the workplace contribute to a harmonious and productive work environment.
  - 9.2.7. To make decisions in a fair and timely manner, giving due attention to relevant information and proper regard to relevant rules and DRAP's internal policies and procedures.
  - 9.2.8. To respect the individual and cultural differences amongst staff, the rest of the public sector and the community and to avoid discrimination and harassment.
  - 9.2.9. To avoid influencing others by expressing political, religious or social beliefs.



- 9.2.10. To observe common courtesies and etiquettes in terms of day-to-day relationship with other staff.
- 9.2.11. To comply lawful instructions given by an authorized colleague.
- 9.2.12. To provide and accept supervision appropriate to individual situations.
- **9.3.** Employees must provide an affidavit on stamp paper of proper value at the time of joining DRAP service on regular, contract, contingent, or deputation basis, regarding non-existence of conflict of interest with your duties at DRAP on the prescribed format provided at **Appendix-I** (**A,B or C**).
- **9.4.** Every employee must submit a signed affidavit of commitment provided at **Appendix-II** on plain paper regarding observance of Code of conduct and ethics of DRAP. Fresh appointees on regular, contract, contingent or deputation basis, / consultants / experts / advisors will be required to submit the said affidavit at the time of joining DRAP Service.
- **9.5.** A breach of this Code may lead to corrective or disciplinary action by DRAP under the relevant service regulations and other laws.
- **9.6.** Members of staff who are deputed/seconded to DRAP from other organizations/agencies, or who are engaged temporarily on contract of any form, have an equal responsibility to abide by the standards of behavior outlined in the Code.
- **9.7.** Officers and staff members should be alert to their individual employment obligations to ensure they are acting ethically, responsibly and productively.
- **9.8.** DRAP employees are paid for the time spent in performing DRAP's work, however, it is recognized that they occasionally have unavoidable circumstances of personal nature which require their attention. Therefore, in such situations employees with the permission of its reporting officer may be allowed to attend such emergency / circumstances, as long as it is short, infrequent, and does not interfere with DRAP's work.



#### 10. CONDUCT OF EMPLOYEES IN VARIOUS SITUATIONS

#### 10.1. Secondary job opportunities

- 10.1.1. There could be occasions, when an employee gets an opportunity of a secondary job or such other commitment, paid or unpaid or a business with competing or non-competing interests.
- 10.1.2. In order to ensure that DRAP employees do not engage, unwittingly or otherwise, in an inappropriate and conflicting outside employment or activity, it must be ensured that they do not engage in such employment, paid or unpaid, without the formal permission of DRAP for competing activities.
- 10.1.3. Educational activities, like conducting a viva or chairing a conference, for which an officer is paid in the form of TADA etc are not prohibited, as long as these activities do not affect the organization and the official duties of the officer.

#### 10.2. Leaving the organization

- 10.2.1. If an employee leaves the DRAP to work elsewhere, they are obliged to respect the confidentiality of information that they have come across during their work, and they should respect the DRAP's intellectual property rights over material produced by DRAP or any information pertaining to the activities of DRAP.
- 10.2.2. Unless otherwise authorized, when they leave DRAP, they cannot take away any in-house resources such as classified manuals, materials produced as official functions of DRAP, or download information. These are the property of DRAP.

#### 10.3. Accepting invitations, gifts or money

- 10.3.1. A gift is understood to mean:
  - 10.3.1.1. A sum of money,
  - 10.3.1.2. Any physical object,
  - 10.3.1.3. The possibility to participate for free in events which are open to the public or are private in nature, are only accessible in return for



payment and represent a certain value (such as complimentary tickets for sports events, concerts, theatre, conferences etc),

- 10.3.1.4. Any other advantage with a financial value.
- 10.3.2. Invitation is defined as an offer of food, drink, accommodation, travelling and /or entertainment from any source outside DRAP from any interested party.
- 10.3.3. As a DRAP officer / official one may be offered gifts, benefits like travel or hospitality during the course of their work. The acceptance of gifts and other benefits has the potential to compromise your position by creating a sense of obligation and so undermining your impartiality. It may also affect adversely the public perception of the integrity and independence of DRAP and its employees. As a principle such offers should be declined. And if after declining such offer, a person or an organization makes repeated attempts to influence you with any such potential benefit, the same must be immediately brought in the notice of your reporting officer and Admin, HR & Logistics Division of DRAP in writing.
- 10.3.4. Members of the Board and Committees, experts and staff should seek permission before accepting any honor, decoration, favor, gift or payment of any kind that are related to the tasks assigned to them while working for/in DRAP.
- 10.3.5. In principle, invitations are to be treated like gifts, since an invitation might influence on, because it is of value (whether or not of a monetary value), or give the impression that member, expert or employee is biased or being influenced or open to influence. Members of the Board and Committees, experts, employees and staff are advised to be very careful about accepting gifts or hospitality or invitations offered to them. As a principle, they should discourage gifts of anything more than nominal or symbolic value. Traditional gifts of nominal or symbolic value offered by regulators (foreign) may however be accepted, where they are unable to refuse without causing offence, and declare its acceptance in writing to the relevant Head of



- Department or Head of Division and if such gift is not of nominal value they must declare its acceptance, in writing, to the Administration & HR Division.
- 10.3.6. A gift sent to a home address may not be accepted and must be returned and the Authority notified in writing (sent to HR). Where it is not practical to return a gift, e.g. due to high postage cost, the sender should be informed in writing by the recipient that the gift cannot be accepted and will be transmitted to charity.
- 10.3.7. If a gift is offered to a spouse or child of the employee, the same considerations apply as if the gift were given to the employee directly.
- 10.3.8. An officer or official shall never accept any money or any offer of money.
- 10.3.9. A key notion in the offence of bribery is that of "undue advantage." That is, something intended to be of value to the public servant. An advantage can encompass anything of value and is not limited to money or tangible gains. The provision of services may also amount to such an advantage. Some examples are, any gift (in kind or cash), loan, employment, discount, service, favor etc, whether offered inside or outside the country.
- 10.3.10. Acceptance of money or other undue reward (tangible or intangible) constitutes a criminal offence of bribery and shall be dealt with under Government Servants E&D Rules, 1973, and or DRAP Employees Service Regulations 2015 where applicable.
- 10.3.11. All offers which are individually targeted and not available to colleagues or associates who share a common task must be declined.
- 10.3.12. Item which relate to the work of DRAP, such as a book on a relevant topic, may be accepted, but refuse items which are unrelated to your work to avoid any kind of obligation particularly towards a causal relationship.
- 10.3.13. Low value items given for purely information purposes (brochures, scientific literature, scientific books, booklets, catalogues, calendars etc) are not considered as gifts in this context.
- 10.3.14. In an event of interaction with a foreign dignitary during the performance of official duties, a gift might be accepted in exceptional circumstances when to refuse it would be unnecessarily rude and



inappropriate according to the diplomatic norms. However receiving of such gift must be notified in writing to the Admin & HR Division DRAP.

#### 10.4. Invitations to Publish, Give Speeches, Interviews or Lectures

- 10.4.1. Publications, speeches or lectures in an official capacity on behalf of the Authority must be distinguished from the private publications, speeches or lectures.
- 10.4.2. When a staff member is acting in an official capacity, advance clearance for the content is required by the Head of Department or Division.
- 10.4.3. Staff wishing in a private capacity to publish a text, give a speech, an interview or lecture on a subject relating to the work of the DRAP or M/O NHSR&C may inform the DRAP in advance in writing. Permission will usually be granted unless the content of the publication, speech, or lecture would seriously prejudice the legitimate interests of the DRAP and/or the M/O NHSR&C.
- 10.4.4. Furthermore, in case a survey or interview is conducted as part of a research or other such purposes relating to DRAP, by an individual or an organization in which the respondents are DRAP employees and the, formal written permission shall be sought from the Director (Admin, HR & Log) DRAP in advance by the research conducting party and the same shall be ensured by the employees before getting involved in any such activity.

#### **10.5.** Using Public Resources

- 10.5.1. DRAP's resources can be generally categorized into three areas; equipment, people and finances. As these resources are publicly funded, their use needs to be efficient and judicious.
- 10.5.2. Use of such resources (like office car, computer, printers, photocopier etc) for personal purposes without entitlement must be discouraged.

#### 10.6. Participation in Political Activities

10.6.1. Whereas casting a vote is a constitutional right, officers must avoid participating in other political activities nor should they form a political



- association with a political party. It is also prohibited to participate in public demonstrations of any nature.
- 10.6.2. Any such activity must be avoided, the nature of which may cast doubt on the ability or willingness of an officer to implement DRAP policies, objectives or allows DRAP's position to be misrepresented.

#### 11. GUIDANCE ON CONFIDENTIALITY AND DISCRETION

- 11.1. DRAP is a public organization mandated to regulate therapeutic goods for protection of human and animal health. Members of the Board, members of Committees, experts and staff members must treat DRAP's official information except information made already public with the utmost discretion and confidentiality.
- 11.2. DRAP's work may involve situations where employees have access to sensitive, confidential or personal information regarding people and organizations with which DRAP has official dealings during the course of its regulatory operations. Such information shall be dealt appropriately and only used for the purposes of carrying out the DRAP's functions.
- **11.3.** DRAP is often entrusted with sensitive information by other agencies for carrying out its regulatory functions or to provide advice on issues related to therapeutic goods. Information may be disclosed only when officially authorized by Head of Department if it is necessary in the public interest to do so. The information must not be used to gain a personal or commercial advantage for yourself or any other person.
- 11.4. Section 31of DRAP's Act, 2012 sets out a duty of confidentiality for members of the Board and Scientific Committees, experts and DRAP staff. The DRAP recognizes that its staff, members of Scientific Committees and experts have access to confidential information. This code of conduct binds officers and officials to a general duty of confidentiality and a duty to exercise the greatest discretion even after leaving the service of the DRAP. Interim staff, national experts on secondment, visiting experts, and persons participating in a work experience programme (trainees) all are required to sign a confidentiality undertaking.



- **11.5.** DRAP staff and other concerned persons are advised to exercise care when answering questions so as not to supply information to third parties regarding specific products where this information is not public.
- **11.6.** Discretion should be exercised when discussing professional work with third parties, including family and friends, and with colleagues or third parties in a public place. Where there is doubt about the provision of information, DRAP officers and officials should seek guidance from their head of department or division.
- 11.7. On matters related to DRAP, DRAP officers / officials should not speak directly or indirectly to journalists and the wider media without permission from the DRAP Administration.
- 11.8. The CEO, DRAP will authorize officers to make public comments on behalf of DRAP. Public comments shall only be made with this authorization. If any media inquiries are received, these should be referred to the Public Relations Officer who is the official spokesperson of DRAP. Even if you do not provide any information to a journalist, inform the media officer of any approaches from the media for information or comments.
- 11.9. Except when making authorized comment, discussions about DRAP's work should be confined to material that is already in the public domain. Public domain material includes published annual reports/ Year Books, public relations material. It should also be ensured that personal views are not presented or interpreted as official comment. If you become aware that comments you have made socially or inadvertently may be used to harm DRAP's reputation or compromise its work, you should notify your superior or the media officer immediately.
- 11.10. Members of the Board, Committees and working parties, experts and staff have a life-long duty of confidentiality even after they have ceased their relationship with the DRAP. This covers all information covered by the obligation of professional secrecy. Staff members are required to behave with integrity and discretion after leaving the Authority.
- **11.11.** Ex DRAP staff should not exploit their relationship with former colleagues to obtain professional advantage or information of a specific or regulatory nature for personal advantage.



**11.12.** Once a document or information has been made public, confidentiality ceases only to the extent of the information released into the public domain.

#### 12. EVALUATION OF CONFLICT OF INTEREST

- **12.1.** A conflict of interest may occur if an interest or activity influences or appears to influence the ability of an individual to exercise objectivity or impairs the individual's ability to perform his or her employment responsibilities in the best interests of the Authority.
- **12.2.** DRAP is committed to the highest levels of integrity. Officers/officials of the Authority are expected to conduct their relationships with each other, the organization, and outside organizations with objectivity and honesty. The general rule is that: Officers/officials of the Authority are obligated to avoid financial and professional conflict of interest and disclose ethical or other conflicts of interest involving the organization, and remove themselves from a position of decision-making authority with respect to any conflict situation involving the organization.
- **12.3.** A potential conflict of interest may take many different forms that include, but are not limited to:
  - 12.3.1. Individual or any member of his or her family may receive a financial or other significant benefit as a result of the individual's position in the Authority;
  - 12.3.2. Individual has the opportunity to influence the Authority's decisions in a manner that leads to personal gain or advantage;
  - 12.3.3. Individual engaging in activities that will bring direct or indirect profit to any entity dealing with therapeutic goods
  - 12.3.4. Individual owning shares of any entity dealing with therapeutic goods
  - 12.3.5. Individual using connections obtained through the Authority for their own private purpose
  - 12.3.6. Individual using Authority's equipment or means to support an external business

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12.3.7. Individual acting in ways that may compromise the Authority's legality.



#### 12.4. Management of Potential Conflict of Interest

- 12.4.1. The Officers/officials of DRAP are expected to have no professional / financial conflict of interest what so ever, and shall not be involved in any such activity outside DRAP that may be influenced by their respective position in DRAP.
- 12.4.2. However, the possibility that a conflict of interest may occur can be addressed and resolved before any actual damage is done. Therefore, when an employee / individual understands or suspects that a conflict of interest might exists, they should bring this matter to the attention of Administration, HR & Logistics Division through their officer in-charge so that preventive/corrective actions to avoid conflict may be taken.
- 12.4.3. Where an employee declares a conflict of interest in relation to any matter associated with the working of DRAP, that employee shall restrain from participating in any proceedings related to that matter. The employee shall not be involved in any meeting, decision making, communication or action pertaining to that matter. These responsibilities may be transferred to another person who does not have a conflict of interest.
- 12.4.4. The responsibility of resolving a conflict of interest starts from the officer in-charge and may reach Administration & HR Division. All conflicts of interest will be resolved as fairly as possible. Top management i.e. CEO has the responsibility of the final decision when a solution cannot be found.

## 12.5. Mechanism for Reporting Conflict of Interest

12.5.1. Members of the Policy Board and employees are responsible to submit affidavit for non-existence of professional and financial conflict of interest as per section 18 of the DRAP Act 2012 on the prescribed format at **Appendix-I** (**proforma A, B & C**). Members of the boards and Committees are required to submit affidavit for non-existence of professional and financial conflict of interest on the prescribed format at **Appendix-I** (**proforma D**). However, individuals must declare any other form of conflict of interest as early as the conflict arises.



- 12.5.2. Where a person suspects that a conflict of interest may exist, that person may make a report in writing to the Administration, HR & Logistics Division through their officer in-charge, stating all matters they believe relevant to the alleged conflict of interest.
- 12.5.3. A variety of situations, affiliations and relationships may create potential conflicts of interest. Relationships by an employee or their family with the therapeutic goods industry could potentially create the appearance of impropriety or interfere with an employee's responsibilities on behalf of and in the best interests of the Authority and it is an ethical obligation of the employee to disclose such relations. When deciding what kind of relationships should be disclosed, consider the situation from the perspective of an outsider and whether the relationship is of such a nature that it could raise an allegation of an apparent or actual conflict of interest, and then mistaken on the side of transparency, as disclosure helps to alleviate or avoid future misunderstandings.

#### 12.6. Consequence of Failure to Declare Conflict of Interest

12.6.1. Where an employee fails to declare his conflict of interest and is found to have participated in deliberations, the making of a recommendations or decisions, or in another process in respect of which that person has a conflict of interest, the deliberations, recommendation, decision, or other process shall be reviewed in the absence of the person affected by the conflict of interest. Furthermore, strict disciplinary action will be taken against the employee as per Government Servant E&D Rules (1973) / DRAP employee regulations.

#### 13. REFERENCES

- 13.1.1. Drug Act 1976
- 13.1.2. DRAP Act 2012
- 13.1.3. DRAP Employees Service Regulation 2015 as amended time to time



## (Proforma-A) for Members of Policy Board

## AFFIDAVIT FOR NON-EXISTANCE OF CONFLICT OF INTEREST

I		S/D/W/O	
having	CNIC No, resid	ent of	serving in
_	Regulatory Authority of Pakistan as Membe clare on oath:-	er of	, solemnly affirm
1.	That neither I nor any of my immediate Spouse) have any financial or professional the Drug Regulatory Authority of Pakistan	conflict of interest as required	
2. That whatever has been stated above is true to the best of my land has been concealed thereof. If anything is found to be contrary solely held responsible and liable for legal action.			,
		DEPONENT	
		Signature:	
		Name:	
		Designation:	
		Date:	



## Appendix-I (B)

**Effective Date: 15-06-2021** 

## (Proforma-B) for Directors

## AFFIDAVIT FOR NON-EXISTANCE OF CONFLICT OF INTEREST

[			S/D/	W/O				
naving	CNIC No		serving	in Drug	Regulatory	Authority	of Pakistan	as
		in	pay			,	resident	of
		solemnly	affirm ar	nd declare	on oath :-			
1.	That neither I nor any Spouse) have any finar	•		•		•	_	
	Drug Regulatory Author	-			1			
2.	That whatever has been bas been concealed the solely held responsible	ereof. If anythin	ng is foun	d to be co	•	•		_
				DEPON	IENT			
				DEION				
					Signature:_			_
					Name:			_
					Designation			_
					Dotos			



## Appendix-I (C)

**Effective Date: 15-06-2021** 

## (Proforma-C) for all employees except Directors

## AFFIDAVIT FOR NON-EXISTANCE OF CONFLICT OF INTEREST

			S/D/	/W/O				
naving	CNIC No		serving	in Drug	Regulatory	Authority	of Pakistan	as
		in	pay			,	resident	of
		solemnly	affirm ar	nd declare	on oath :-			
1.	That I do not have any fin	ancial or pro	fessional	conflict o	f interest as r	equired und	ler Section 18	(1)
	of the Drug Regulatory A	uthority of F	Pakistan <i>A</i>	Act, 2012.				
2.	That whatever has been s	stated above	is true to	the best of	of my knowle	edge and b	elief and noth	ing
_,	That whatever has been stated above is true to the best of my knowledge and belief and nothing has been concealed thereof. If anything is found to be contrary to the above declaration I shall be							
	solely held responsible an	-	_		·			
				DEDON	TENTE			
				DEPON	NEN I			
					C! 4			
					Signature:_			_
					Name:			_
					Decignation	•_		
					Designation Date:-	•=		-



## Appendix-I (D)

**Effective Date: 15-06-2021** 

## (Proforma-D) for expert members of boards / committees

## AFFIDAVIT FOR NON-EXISTANCE OF CONFLICT OF INTEREST

I	S/D/W/O					
	IC No resident of					
Drug Reguland declare	latory Authority of Pakistan as Member of on oath :-	, solemnly affirn				
1. Tha	at I do not have any financial or professional conflict of interest.					
has	That whatever has been stated above is true to the best of my knowledge and belief and nothing has been concealed thereof. If anything is found to be contrary to the above declaration I shall solely held responsible and liable for legal action.					
	DEPONENT					
	Signatur	e:				
	Designat	ion:				
	Data:-					



## Appendix-II

**Effective Date: 15-06-2021** 

## **AFFIDAVIT OF COMMITMENT**

<u>I</u>	S/D/V	V/O
having CNIC No	serving i	n Drug Regulatory Authority of Pakistan
		, confirm that I have read the Code
of Conduct and Ethics for the	Officers and Officials of DIct in accordance with the re	RAP and concur to abide by its provisions equirements of the Code of Conduct and
		Signature:
		Name:
		Designation:
		Date:

 ${\tt NOTE:-}\ \textit{This COMMITMENT shall be placed in the personal file of the DRAP\ Officer/\ Official.}$ 

## DRUG REGULATORY AUTHORITY OF PAKISTAN

Telecom Foundation Complex, G-9/4, Islamabad, Pakistan Email: director.admin@dra.gov.pk www.dra.gov.pk