AL-Razi Drug Store Co. Ltd.

Code of Conduct

Ramallah- Industrial Zone,P.O Box: 1201 Palestine

Dear Colleagues

In connection with the implementation of our new Code of conduct, which has become effective On 13/01/2019 These "AL-Razi Drug Store Company Code of Conducts" set the standard for good and responsible practices regarding pharmaceutical products within the company. AL-Razi Code of Conducts are an important reference for all of us and will help us understand the good business practices when dealing with Health Care Professionals who are prescribing our products. There is an absolute need to follow these rules, not only to avoid major criminal or civil liabilities, but also to help us to keep focused on our main goal to service the health of the patients and, ultimately, to stay competitive on a sustainable and long term basis. With the integration of AL-Razi Drug Store Company, these guidelines will now become the Rules of the organization. They shall provide the necessary basis to fulfill our task to become a pharmaceutical company that defines itself through quality and integrity to achieve our goals. Mirroring the effective date of AL-Razi Code of Conducts, the AL-Razi Code of Conducts has taken effect on 13/01/2019. From that date on, all new activities directed to the prescribers of our products need to comply with AL-Razi Code of Conducts. All activities organized by any AL-Razi Drug Store Company need to comply. With this letter, we therefore reinforce our commitment to AL-Razi Code of Conducts and urge you to follow these rules vigorously.

Best regards,

Mohammad Rayyan
General Manager

Ramallah- Industrial Zone,P.O Box: 1201 Palestine

INTRODUCTION

The code of conducts for AL-Razi Drug Store Company Co. (RDC) board members, staff and volunteers is a written policy that sets out the expectations of proper behavior for people affiliated with the (RDC). It encourages ethical behavior and helps guide uniform decision-making. It specifies which behaviors are and are not acceptable when acting on behalf of the (RDC).

The code of conduct encourages ethical behavior, accountability and transparency while discouraging or prohibiting unethical behavior, discrimination, breaches of confidentiality, and other undesirable, dangerous, or illegal behavior. Each board and staff member should read and sign the code of conduct. New staff and volunteers should be asked to read and sign the code of conduct when they begin work.

FUNCTION

(RDC) Code of Conducts serves two main functions. First, it clearly informs the staff, board of directors and volunteers what is expected of them. It lays the "ground rules" of proper behavior and alerts the staff that certain behaviors are not tolerated. The code of conduct creates a culture of respect and accountability. Second, the Code of Conducts protects the (RDC). If a board or staff member or a volunteer violates the code of conducts, he may be terminated with the understanding that he knew, from the code of conducts that his behavior was improper.

FEATURES

(RDC) code of conducts includes rules covering the following issues: Ethical promotion, dress code, illegal drug use, laws and regulations, confidentiality, conflicts of interest, discrimination, use of the organization's property, and how to report illegal, unethical or questionable behavior.

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APPLICATION OF THE CODE OF CONDUCTS

The code of conducts is intended to serve as a guide for all (RDC) staff in making decisions in their professional lives and at times in their private lives. By following this code of conducts, it is intended that all staff will contribute to strengthening the professionalism and impact of the work of (RDC) and have a shared understanding of who we are and how we behave.

The Code of Conducts forms part of the terms and conditions of employment of all members of staff:

- All members of staff will be given a copy of this Code of Conducts and be required to familiarize themselves with its requirements, by reading and discussing the Code with their managers or colleagues.

- All members of staff will be required to confirm this by signing their agreement to the Code of Conduct and by keeping a copy. A further copy of the signed agreement will be kept in the employee's personal file.

- The director and senior management also have a particular responsibility to uphold the standards of conduct and set an example.

- In the recruitment and selection of staff, (RDC) should seek to ensure that candidates selected, support believes and values of the (RDC).

- Any employee who has concerns about the behavior of another employee should raise these with the appropriate superior. Any concerns will be treated with urgency, consideration and discretion.

- Any breaches to the requirements of this Code of Conducts will be subject to investigation and possible disciplinary action in line with (RDC's) disciplinary procedure at a level appropriate to the breach.

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CODE OF CONDUCTS –AL-Razi Drug Store Company

INTRODUCTION

As an (RDC) employee, you are required to abide by the organization's policies and procedures, the terms and conditions of your employment (as outlined in your employment contract), and to ensure your conduct is in keeping with the organization's vision, mission, believes, values and strategic objectives.

The aim of this Code of Conducts is to formalize the standards by which you may need to behave in certain circumstances. The Code applies to all (RDC) staff, regardless of location, and in accepting appointment; you undertake to discharge your duties and to regulate your conducts in line with the requirements of this Code. The Code is designed for your guidance and protection.

This Code of Conducts underpins the behaviors that are expected of employees to demonstrate their commitment to (RDC's) ethos, ways of working, principles and values. It will be supported by various (RDC) policies and procedures.

(RDC) is a Palestinian based company, and therefore the Code of Conducts is based on Palestinian and International Legal standards, as well as written to reflect the organization's fundamental believes and values (as outlined below), to support its mission and its commitment to ensuring that everyone is respected and valued.

VISION, MISSION, VALUES AND STRATEGIC OBJECTIVES

VISION:

(RDC) aims to be the leading drugstore offering quality affordable medicines with superior customer service, complemented by a strong sense of social purpose.

MISSION:

- To sell quality medicine and medical supplies at competitive and affordable prices.
- To offer the best drugstore service in the country.
- To foster a corporate culture it can be proud of.
- To develop a dedicated management structure and efficient staff who treat their customers - and each other - with respect and dignity.

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VALUES:

- Integrity: We commit to truth and honesty in what we say and do, and practice high standards of fairness and ethics at work and in our relationships.
- Customer Satisfaction: We serve and interact with our internal and external customers as best as we can, in a professional and friendly manner. We constantly look for innovative products and services that will answer their needs.
- Excellence: We aim high in everything we do and continuously seek to improve our level of performance.
- Team work: We communicate and cooperate with one another, working together in a harmonious way to achieve the company's goals.
- Respect for the Individual: We show respect, appreciation and concern for every person. We engage in positive relationships based on mutual trust.
- Social Purpose: We believe that it is our responsibility to help the community and our countrymen. We recognize that the nature of our business, especially the corporate focus on quality affordable medicines, gives us a unique opportunity to make a very positive contribution to the health of the communities that we serve.

STRATEGIC OBJECTIVES

(RDC) work is guided by the following strategic objectives:

- Deliver our core regulatory services in a way that is fit for current and future purpose
- Strengthen our capability to measure and improve the efficiency and effectiveness of our operational performance.
- Anticipate and respond to developments in the Palestinian pharmaceutical and healthcare sector.
- Make sure that we have the right people in place, with the right culture and organizational policies and procedures.

GROUPS SERVED BY (RDC)

(RDC) serves different groups within the Palestinian society including:

- **PA-MOH Hospitals**
- **Private Hospitals**
- **Community pharmacies**
- **Drug stores**
- **Clinics**

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SCOPE

This Code of Conduct applies to all (RDC) board members, employees and volunteers.

DEFINITIONS

- **Pharmaceutical Products** mean all pharmaceutical or biological products which are intended to be used on the prescription of, or under the supervision of, a healthcare professional, and which are intended for use in the diagnosis, treatment or prevention of disease in humans.

- **Events** means all promotional, scientific or professional meetings, congresses, conferences, symposia, and other similar events (including, but not limited to, advisory board meetings ,visits to research or manufacturing facilities, and planning, training or investigator meetings for clinical trials and non-interventional studies) organized or sponsored by or on behalf of (RDC).

- **Promotion** means any activity undertaken, organized or sponsored by a (RDC) employees which is directed at healthcare professionals to promote the prescription, recommendation, supply, administration or consumption of our pharmaceutical products through all media, including the Internet.

- **Healthcare Professional** means any member of the medical, dental, pharmacy or nursing professions who prescribes a pharmaceutical product or any other person who in the course of her professional activities may prescribe - and as a prescriber - may recommend, purchase, supply or administer a pharmaceutical product.

Standards of Promotion

- Advertising of our products may be targeted only to medical professionals, unless consumer advertising is permitted by law.

- We take particular care that essential information as to pharmaceutical products' (safety, efficacy i.e. contraindications, precautions and side effects), is appropriately and consistently communicated.

- All information and promotional material for our pharmaceutical products have to be clear, legible, accurate, balanced, fair, objective and sufficiently complete to enable the recipient to form his own opinion of the therapeutic value of the medicinal product concerned.

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- Statements included in our promotional materials shall be based on the latest scientific evidence and reflect that evidence clearly.

- We shall follow national and international requirements for reporting suspected adverse reactions of our pharmaceutical products.

- Our promotional material is always capable of substantiation, which will be promptly provided in response to reasonable requests from healthcare professionals.

- When promotional material relates to published studies, a clear reference to these shall always be given in the material.

- We will not make statements to customers that unfairly discredit competitors or competitors' products.

- All company communication is written in a way that reflects correctly our company's values.

- All advertisements about the company or company products require review by a person/body that is responsible for and capable of validation of communication and publication.

- We are committed to being transparent and giving as far as legally possible extensive information about the effects and side effects of our drugs.

- We express ourselves and our promotional messages clearly, simply and comprehensively, in a manner allowing the recipients to understand the content and nature of our messages.

Events

- Scientific and educational objectives must be the principal focus of events for Healthcare professionals organized or sponsored by (RDC) and entertainment and other hospitality shall not be inconsistent with such objectives.

- The hospitality provided must always be kept at a reasonable level in terms of financial support as well as duration, and must always be secondary to the principle professional or scientific object of the event.

- The extra hospitality provided must always be limited to the extent that healthcare professionals who benefit from it would reasonably be prepared to pay for themselves.

- Meals and beverages of good quality and quantity may be provided, but must not be excessive; gala-type meals are not permitted.

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- Specific lunches or dinners may be organized in locations with a cultural or scientific character. Entertainment during events is not allowed with the exception of minimal performance accompanying lunches and dinners, not being announced as a cultural highlight i.e. background music.

- Events must take place in a business environment, not in extravagant or predominantly tourist locations, thus reflecting the scientific or educational objectives and purpose of the event.

EXHIBITIONS

- The way in which our stand is laid out, the decoration and the informative material must be such that the scientific nature is most prominent.

- Our trade displays must generally only be targeted to healthcare professionals.

- Where it is permitted to communicate to the public, we must strictly comply with the respective regulations.

- Exhibits we own must comply with all requirements of the sponsoring institution when mounting and conducting an exhibition.

- Product information for the pharmaceutical products we promote must be available from the display stand.

Gifts

- We may provide promotional aids or reminder items of modest value to healthcare professionals for free, as long as they are related to the healthcare provider's work and/or entail a benefit for patients.

- We may offer text or reference books/information, and other educational material for free, provided that such items are not of excessive value (e.g. no 2 or more volume books) and they have a genuinely educational purpose.

Samples

- We may supply samples, clearly identified as such, on an exceptional basis and for a limited period of time to the prescribing professionals to familiarize them with the products, to enable them to gain experience with the product in their practice, or upon request.

- Each sample must be marked 'free medical sample – not for resale' or words to that effect and must be accompanied by a copy of the summary of product characteristics.

- Since it must be ensured that samples are only requested to inform physicians, we do not combine the offer or distribution of samples with the offer or distribution of advertising gifts.

Medical representatives

- (RDC's) medical representatives shall be adequately trained and possess sufficient medical and technical knowledge to present information on (RDC's) products in an accurate, responsible and ethical manner.

- All representatives should also provide regular feedback to (RDC), from contacts in the medical and all MD profession, regarding the information which they receive on the use of products and particularly reports on side effects.

- Our representatives should always keep in mind that the frequency, timing and duration of visits to healthcare professionals, pharmacies or hospitals, together with the manner in which they are made, do not cause inconvenience.

- The systems of remuneration of our representatives must not lead to unethical behavior which may adversely influence the proper prescribing of pharmaceutical products by the physician.

GENERAL STANDARDS

As an employee of AL RAZI DRUG STORE COMPANY, I will:

1. **Be responsible for the use of information and resources to which I have access by reason of my employment with (RDC).**

I will ensure that I use (RDC) information, funds and resources entrusted to me in a responsible and cost effective manner and account for all money and property, following the appropriate policy and procedural requirements. Resources and property include

- Money entrusted to (RDC)
- (RDC) vehicles
- Telephones, photocopiers, fax machines and stationery
- Other office equipment or equipment/resources belonging to (RDC)

- Computers including the use of email, internet and intranet
- Information that is confidential or restricted concerning (RDC) and individuals
- Appropriate use of (RDC) information and the use of the (RDC) name
- (RDC) premises
- Any other (RDC) belongings

2. **Ensure the safety, health and welfare of all (RDC) employees, volunteers and contractors.**

2.1. I will adhere to all legal and organizational health and safety requirements in force at the location of my work.

2.2. I will comply with all security guidelines, and be pro-active in informing management of any necessary changes to such guidelines.

2.3. I will behave in such a way as to avoid any unnecessary risk to the safety, health and welfare of myself and others, including partner organizations, beneficiaries and visitors.

3. **Ensure that my personal and professional conduct is, and is seen to be, of the highest standards and in keeping with (RDC's) believes, values and aims**.

3.1. I will treat all people fairly and with respect and dignity and recognize the professional opinion of others. I will be accountable for my actions and will not use unequal power relationships for my own benefit.
3.2. I will work with others in an open and participative way, co-operating both within and across teams to support the delivery of organizational results.

3.3. I will take responsibility for the quality and timeliness of my own work to contribute to the achievement of organizational objectives.

3.4. When working in an international context or travelling internationally on behalf of (RDC), I will observe all local laws and be sensitive to local customs.

3.5. I will not work under the influence of alcohol in ways that may impair my judgment or have an adverse impact on the behavior exhibited on (RDC) premises or when representing (RDC) at external functions.

3.6. I will not use, or be in possession of, illegal substances on (RDC) premises or when representing (RDC) at external functions

3.7. I will seek to ensure that my personal conduct does not compromise (RDC's) values and does not impact on or undermine my ability to undertake the role for which I am employed.

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3.8. In acknowledging that effective media coverage of (RDC) activities is pivotal to the success of our work, I will not give interviews or provide information to the media unless I have been specifically authorized to do so. I will not disclose information that is confidential or may be used to harm (RDC) or any individual.

3.9. I will not accept significant gifts or any remuneration from governments, beneficiaries, partners, donors, suppliers and other persons, which have been offered to me as a result of my employment with (RDC).

3.10. I will not abuse my position as an (RDC) employee by requesting any personal service or favor from others in return for financial or any kind of assistance by (RDC).

4. **Perform my duties and conduct my private life in a manner that avoids possible conflicts of with the work of (RDC) and my work as an employee of the organization.**

4.1. I will declare any financial, personal, family (or close intimate relationship) interest in matters of official business which may impact on the work of (RDC) – e.g. contract for goods/services, employment or promotion within (RDC), partner organizations, civil authorities, beneficiary groups.

4.2. I will seek permission before agreeing to being nominated as a prospective candidate or another official role for any political party.

4.3. I will not accept any additional employment or consultancy work outside (RDC) without management approval to ensure there is no conflict of interest and that I remain within appropriate limits in respect of working hours.

5. **Avoid involvement in any criminal activities, activities that contravene human rights or those that compromise the work of (RDC).**

5.1. If I become aware of any form of illegal activity, I will make it known to the appropriate authorities.

5.2. I will notify the organization if I am found guilty of any criminal charges during my employment.

5.3. I will not carry a weapon on (RDC) premises nor jeopardize the safety of myself or others by carrying a weapon when representing (RDC) in Palestine or outside the country.

6. **Refrain from any form of harassment, discrimination, physical or verbal abuse, intimidation or exploitation, both in and out of work.**

6.1. I will fully abide with the requirements of (RDC) equal opportunities, diversity and anti-harassment policies.

6.2.I will never knowingly engage in any exploitive, abusive or corrupt relationships and will take appropriate action if I become aware of them.

I have read carefully and understand AL-Razi Drug Store Company Code of Conduct and hereby agree to abide by its requirements and commit to upholding the standards of conduct required to support (RDC's) vision, mission, beliefs and strategic objectives.