

# CODE OF CONDUCT

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QUALITY. INNOVATION. TRUST.

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# CODE OF CONDUCT

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*The Code of Conduct contains the principles that guide us. Each of us needs to know, understand and apply these principles in our daily work, regardless of our function or level in the company. This reference document is here to support everyone at Zdravlje so that we can remain true to our commitments to people, patients, doctors, scientists, partners, investors and society at large.*

# I. OUR VISION AND OUR MISSION

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## **Our Vision:**

- To Be a Reliable Pharmaceutical Leader Built on a Foundation of **QUALITY, INNOVATION & TRUST.**

## **Our Mission:**

- Deliver the highest levels of clinical excellence with unparalleled levels of partner, physician & patient trust.
- Act with integrity and maintain the highest standards of quality, ethics & compliance.
- Remain an employer of choice in Serbia with a highly motivated and well-trained workforce.
- Consistently strive to expand our reach and capabilities.
- Remain flexible to swiftly react to a dynamic market.
- Support the communities we work in and grow sustainably.

## II. WHO IS CONCERNED

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This Code of Conduct applies to all Zdravlje's employees and contractors and everyone conducting business on behalf of Zdravlje.

## III. PERSONAL RESPONSIBILITY FOR COMPLIANCE

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This Code of Conduct contains the principles that guide us. Each of us need to know, understand and comply with applicable laws and regulations as well as Zdravlje's policies, because that is the responsibility of each and every one of us. In certain cases, this Code of Conduct is supplemented by additional policies that cover specific topics in more detail or deal with certain local or regional issues. While this Code of Conduct is designed to familiarize us with many of the relevant policies, it is not as comprehensive as these supplemental policies and therefore does not supersede them or act as a substitute for reviewing each policy that applies to our specific job.

## IV. HOW TO RAISE A CONCERN

There may be instances when the guidance in this Code of Conduct varies with the local law or customs of a particular country. In cases where local law or customs impose higher standards than those set in the Code of conduct, local law and customs should always apply. If, by contrast, the Code of Conduct provides for a higher standard, it should prevail.

IF YOU HAVE ANY DOUBT, ASK YOURSELF THE FOLLOWING QUESTIONS:

- Am I violating any law, Zdravlje's Code of Conduct, policies & procedures?
- Am I being inconsistent with ethical values?
- Am I treating others the same way I would expect to be treated?
- Will I owe something in return to anybody?
- Could my decision appear improper if published on the front page of a newspaper?

IF THE ANSWER TO ANY OF THESE QUESTIONS CAUSES YOU CONCERN,  
DO NOT KEEP IT TO YOURSELF - RAISE THE CONCERN.

If a Zdravlje's employee/contractor/third party conducting business on behalf of Zdravlje has a concern or believes in good faith that a law, regulation, provision of any Zdravlje's policy, or one of the principles of the Zdravlje Code of Conduct has been or is about to be violated, he/she has the duty to raise the concern directly to the Legal and Compliance Department or through direct manager/Business Unit Head, Human Resource Department or Finance Department.

The following email is available for that purposes as well:

Email: [compliance@zdravlje.co.rs](mailto:compliance@zdravlje.co.rs)

## V. ZDRAVLJE'S PRINCIPLES OF CONDUCT

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### 1. Our People and Social Responsibility

Zdravlje is committed to:

- ▶ Prohibiting any conduct that may negatively affect a person's dignity.
- ▶ Maintaining a zero tolerance for harassment and all forms of

discrimination on grounds such as:

- gender
- gender identity
- age
- origin
- religion
- sexual orientation
- physical appearance
- health
- disability
- trade union activity
- political opinions
- nationality
- family situation

▶ Promoting diversity, as we believe the distinct identities of our people and external business partners are a source of strength and a key ingredient of our success.

▶ Preserving the health, quality of work life and safety of employees and every person connected to us, even beyond our immediate interactions.

► **Protecting personal data and to processing it only within the boundaries of applicable law.**

We expect that our external business partners adhere to the fundamental principles of the International Labor Organization, especially those relating to child labor, forced labor, working hours, pay, freedom of association and non-discrimination.

## **2. Avoiding Conflict of Interest**

Conflicts of interest arise when we place personal, social, financial or political interests before those of Zdravlje. All employees are responsible for avoiding situations that present – or create the appearance of – a conflict between their interests and those of Zdravlje. Whether on the job or otherwise, nothing should conflict with our responsibilities to Zdravlje.

By avoiding actual conflicts of interest as well as the appearance of a conflict of interest, we will be able to act according to sound business judgment in Zdravlje's best interests, rather than personal interest, relationship, pressure or gain.

## **3. Protecting Confidential and Sensitive Information**

Confidential information is one of our most valuable assets. At Zdravlje protecting any confidential and sensitive information is essential. Inappropriate use or disclosure of such information can cause serious harm to our company, business partners, suppliers and customers, weakening our competitiveness, exposing us to liability, and damaging our reputation.

“Confidential information” means any information, whatever its form, that is not in the public domain, and that we must protect from any inappropriate use or disclosure, because such use or disclosure could potentially harm the Company.

Examples of confidential information include:

- the company's business and financial condition;
- strategic/business plans;
- pricing information;
- products and pipeline information;
- information on partners (current and potential);
- marketing plans and business development strategies;
- clinical data, research and technical data, inventions, and innovations;
- confidential information entrusted by business partners.

## **4. Antitrust, Unfair Competition and Business Intelligence**

Competition and antitrust issues may arise from contacts between Zdravlje and its competitors, suppliers or customers. All employees must comply with competition and antitrust laws and refrain from all unfair behaviour towards competitors. Anti-competitive behaviours may include:

- Entering into agreements, including informal understandings, with competitors for price fixing, bid rigging, market allocation and agreements to restrict supply.
- Exchanging competitively sensitive information with competitors.
- Abusing a potential position of market dominance.
- Imposing restrictions on customers or suppliers.
- Entering into certain mergers and acquisitions.

Fair Dealing – It is important for us to be recognized in the marketplace as a company that operates ethically and in a fair manner. We do not attempt to obtain information of or about our competitors in an illegal or unfair way. Accordingly, stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited.

## 5. Anti-Corruption

We prohibit bribery and corruption. We are not allowed to provide anything of value that is intended to win business, improperly influence a decision, or gain an unfair business advantage – or even appear to do so.

Bribery and corruption damage our business and conflicts with our core beliefs regarding the right way to conduct business. Anyone who engages in corrupt activities will be subject to disciplinary actions up to and including termination. In addition, they and Zdravlje may be subject to civil fines and criminal penalties. Zdravlje also may be held liable for the corrupt activities of third parties acting on its behalf.

We conduct our business openly and transparently, in accordance with Zdravlje's anticorruption policies and applicable laws.

We never bribe, offer, provide or promise anything of value (directly or indirectly) that is intended to improperly influence the action of government officials or private individuals.

Examples of “anything of value” may include, among other things, sponsorships to attend congresses, speaking fees, consultancies, services, charitable donations, political contributions, travel and/or entertainment expenses, gifts, meals, commissions and rebates.

We do not encourage third parties, including representatives, contractors or advisors, to engage in conduct that we would not conduct ourselves.

## 6. Promotional Materials; Scientific Exchanges

All of our scientific and promotional activities with healthcare professionals and organizations are intended to ensure the effective use of our products and enhance patient care. This can include advancing medical research, enhancing medical knowledge or practice management, promoting

our products and services and gathering necessary feedback about our products and services. We use a wide variety of communication channels in providing information. Whatever methods are used, we must provide information accurately and in a proper manner.

Our stakeholders have a legitimate interest in being informed not only on the quality of our products and services, but also on the quality of information we provide to healthcare professionals and organizations. Our objective is to provide scientifically accurate, pertinent and timely information that informs the choice of treatment made between a physician and patient. We wish to safeguard public confidence in healthcare professionals to make decisions solely on the basis of patient's health best interest.

## **7. Interaction with the Scientific Community**

Zdravlje interacts with the medical and scientific community in many ways, including:

- Supporting their medical education by providing fair and balanced information about our products and their appropriate use;
- Organizing medical or scientific meetings or events, or contributing to scientific and educational meetings organized by third parties;
- Entering into compensation-for-service arrangements with external experts to perform a meaningful service or activity in medical or scientific-related domains for legitimate needs, such as conducting studies, participating in scientific meetings, and providing consultancy services.

Engaging an expert for services must not constitute an inducement to prescribe, purchase, supply, sell, administer, or recommend formulary placement of any Zdravlje's product or service. We select experts using objective criteria based on the defined need and not on the expert's past or expected future use or recommendation of Zdravlje's products. Zdravlje must be reasonable in reflecting the fair market value of the service when determining compensation of experts for their services.

## 8. Participating in Public life

Zdravlje operates with transparency, honesty and integrity when participating in public life. Posting or commenting on online content can easily affect the image and reputation of our company, employees, or business partners. No employee or representative of Zdravlje may act or speak on public matters as a representative of the company without prior proper authorization. Zdravlje's employees may engage in public life (including social networks and other media) independently as long as their participation is clearly a personal endeavour with no connection to Zdravlje.

## 9. Environment, Health, Safety & Sustainability

In line with our Zdravlje Vision and Mission and our Environmental, Health, Safety and Sustainability Policy, we are responsible towards our employees, clients and patients, as well as towards the community in which we live and operate, as a leader in protecting the environment, health, safety and sustainability.

In line with this, we are committed to taking the responsibility, continuously improving our Environment Health and Safety achievement and achieve our long-term goal: No Injuries, No incidents and environmental releases, while reducing the use of natural resources.

## 10. Quality

Zdravlje is committed to performing all aspects of its business on a foundation of quality, innovation & excellence and trust so that the safety, efficacy and quality of its products improve the quality of health and life in the community it operates in.

## IN LINE WITH OUR MISSION AND THIS POLICY, WE:

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Continually assess and review the results of Quality Systems, deliver the highest levels of excellence, expand our reach and capabilities, act with integrity and maintain the highest standards of quality, ethics & compliance with relevant legal requirements and current regulatory guidelines in our industry. We build trust and maintain open communication with our stakeholders, ensure the highest standards of quality for our employees, partners, clients, physicians and patients, and the communities we operate in. Quality is a personal responsibility of our employees, who keep and build the reputation of Zdravlje by delivering quality through development, manufacturing and sales of our safe, efficient and high quality pharmaceutical products, promoting Zdravlje as the symbol of quality.



*Kiren Lee Naidoo,*  
**CEO**