

ALHAMER TRADING EST. (RULA PHARMACY)

Code of Conduct and Business Ethics

Department	ATE Quality Assurance Function	SOP #	QMS 01
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SOP Owner	ALHAMER TRADING EST.	Final Approval for V1.1	20 February 2023

1. PURPOSE

Alhamer Trading Establishment's code of conduct aims to educate and ensure all employees of Alhamer Trading Est. about their responsibilities towards implementation of ethical business practices that are to be followed at all times and to regulate their interactions with health care professionals and/or organizations.

2. SCOPE

Every employee, officer, director, consultant, and contract worker (full time or temporary) is expected to read, understand, and comply with this Code and all other applicable laws, regulations and Company policies.

3. BUSINESS ETHICS

All employees of Alhamer Trading Est. (the "Company") shall represent the Company and conduct business on behalf of the Company in an honest and ethical manner so as to maintain high levels of integrity.

Employees shall provide highest levels of respect to the local customs and traditions as well as to international countries with which we do business. Employees shall respect the Company's relationships with health care providers, stockholders, investors, customers and the communities in which we conduct business.

The main goal of all employees shall be to promote and provide products and services so as to contribute to the well-being of patients and their families.

All business transactions carried out by employees complying with local & international laws and regulations. Employees shall maintain respectable honest business relationships in healthcare field.

4. NATIONAL RULES AND FOREIGN RULES

Alhamer Trading Est. prohibits any violations of laws, by-laws, regulations, company rules, policies and procedures by its employees. Alhamer Trading Est adheres and complies with all applicable Business codes in the Kingdom of Bahrain.

Employees shall comply with all applicable national and international laws, by-laws and regulations, company rules, policies and procedures.

Regarding prevention and fight against corruption Alhamer Trading Est. committed to perform its activities in compliance with all applicable laws or regulations addressing corruption and/or bribery.

5. HEALTH CARE COMMUNITY

5.1 Drug Effectiveness, Safety, and Quality

ATE is dedicated to guaranteeing patient safety by ensuring the best possible performance and product quality. ATE goods are regularly monitored through ATE's quality management system after receiving NHRA approval.

ATE's Pharmacovigilance team or the biomedical team, including any report that could be associated with a product or medical equipment that ATE hold marketing license for.

5.2 Marketing Promotion Practices

All product samples that are provided to physicians must be free of charge and solely for the purpose of enhancing patient care. Employees shall ensure that no product, whether directly or otherwise shall be promoted off label, no product shall be advertised directly to customers, unless permitted by local laws and all products advertised to health care professionals shall be as per the product label.

6. DATA PROTECTION AND PRIVACY

All of the employees of Alhamer Trading Est. and the other people with whom ATE does business are committed to having their privacy and personal information protected.

Any information that may be used to directly or indirectly identify an individual is considered personal information. Such data must be adequately protected and secured and may only be disclosed or transferred when legitimate grounds to do so have been established.

7. FAIR COMPETITION

Alhamer Trading Est. is committed to fair competition within the bounds of the law. Any ATE employee must refrain from illegal business practices, such as: prohibited anti-competitive activities.

Anti-competition laws generally prohibit employees from directly or indirectly engaging in discussions, making agreements or coordinating activities with actual or potential competitors abusing a dominant position in a particular market entering into agreements with suppliers, distributors or retailers that limit or eliminate free and fair competition, or engaging in any

other behaviour that would otherwise limit competition in breach of applicable laws and regulations.

8. POLITICAL PARTICIPATION AND CONTRIBUTIONS

We have a responsibility not to directly or indirectly support any political party, politician, candidate for office, or campaign, nor may we utilize ATE's property or assets to raise money or to conduct a campaign without the CEO's prior approval.

9. ANTI-BRIBERY AND ANTI-CORRUPTION

ATE does not accept the payment, offer to pay, or authorization or receipt of any bribe or any other unlawful or improper payment to or from any public official or private person on behalf of ATE.

For more details about Anti-Bribery please refer to: *Anti-Bribery & Corruption Policy QMS-02*

10. WORKPLACE RESPONSIBILITIES

In ATE, everyone has the right to be treated fairly and with respect. Every employee should be treated equally, fairly, and with respect at work, according to ATE. Discrimination, harassment, and abuse of any kind are forbidden and will result in appropriate consequences.

10.1 Labor Practices

ATE complies with all local Labor Market Regulatory Authority (LMRA) laws.

10.2 Diversity, fairness, respect, and equal opportunity for employment

At ATE, we support our leaders in embracing diversity and demonstrating our respect for it in day-to-day operations. In addition to providing equal opportunities regardless of race, ethnicity, religion, disability, age, or gender identity, ATE is dedicated to creating an inclusive workplace that promotes respect for all of its employees.

In regard to concerns pertaining to hiring, compensation, promotion, training, and termination, all employees are treated fairly. Threats, harassment, bullying, intimidation, or acts of violence in any form are not permitted. ATE reports any suspected violations and does not tolerate any behaviour that relates to abuse, harassment, or discrimination. Each employee should bring up these concerns with their management or HR. Every employee has the option to submit an anonymous report.

11. CONFLICTS OF INTEREST

ATE expects complete loyalty from its employees. A conflict of interest may arise when personal interests interfere, or may be perceived as interfering, with an employee's ability to perform a job effectively and objectively. We must not engage in any activities, which could conflict with ATE's business interests, adversely affect company reputation or interfere with the fulfilment of the responsibilities of the Employee's job.

12. PROTECTING COMPANY ASSETS

12.1 Care and Proper Use of the Company's Assets

We must protect ATE's assets against threats such as damage, misuse, loss or theft. This includes tangible and intangible property, reputation as well as financial assets.

12.2 Proper Use of Information Systems, Email, and social media

All business communication internally as well as with external third parties must be done using ATE's approved electronic communications and email accounts. In sending and receiving electronic communications and attachments, we must apply the same standards of care as used in hard-copy communications. Unless otherwise specified, the internet, email and other applications are provided for business purposes. We must not abuse ATE's IT systems, internet access, email accounts, or any other information and communication media to create, send, search for, download, display or receive illegal, inappropriate, offensive, disruptive, or discriminating material.

All ATE property and equipment, including all information stored on them, must be returned upon termination of employment.

13. FINANCIAL INTEGRITY

For ATE, it's critical to capture financial and non-financial data accurately, completely, and on time. In all interactions with co-workers, customers, internal and external auditors, governmental organizations, and other third parties, employees are required to be truthful and accurate. Any business records that are falsified or forged are prohibited. Records must be created honestly so that no data is mistakenly omitted, lacking, or misrepresented. Any discrepancies in any records must be cleared up with the proper adjustments, and any such corrections must be made transparent to the individuals who need to know about them.

14. COMPLIANCE WITH THE CODE OF CONDUCT

14.1 Violation of this Code of Conduct

Ate reserves the right to take all appropriate legal actions against Employees in connection with violations of this Code of Conduct, including-

Immediate termination of the contract without compensation and a reservation of the right to any other remedies at law.


Besides a direct violation, a breach of this Code of Conduct is also committed if:

- e) Someone ignores, tolerates, or fails to correct misconduct
- f) Someone withholds important information in the event of a potential violation of this Code of Conduct upon explicit request
- g) Someone knowingly makes baseless, untruthful reports or raises allegations that are knowingly false.

15. REVISION

- SOP heading with Document No.
- Modified as per the per the new format.

- Subheadings added Health Care Community, data protection and privacy, workplace responsibilities, protecting company assets, financial integrity and compliance with the code of conduct.

Prepared by:	Dr. Christy Susan Mathews
Designation:	PV & QA Officer
Date and Signature:	15 February 2023 
Reviewed by:	Yaseen Ahmed
Designation:	Chief Financial Officer
Date and Signature:	
Approved by:	Dr. Tarek Saied
Designation:	General Manager
Date and Signature:	