



Delta Pharma-AL
Code of Conduct

Version: 02

Effective date: 03.12.2020



Code of Conduct



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1. Our guiding principles

1.1 We Are Patient Focused

We commit to a patient-centred view of the products we distribute and commercialize and the processes and systems which support them. Continuous improvement is a part of everything we do.

1.2 We Empower our Employees

We commit to creating and sustaining an environment in which all employees are encouraged, empowered, and accountable to identify and “speak up” when something must be improved or corrected.

1.3 We Recognize and Reward

Our ability to excel as an organization relies on the knowledge, skill, diversity, and integrity of our employees. Our leaders recognize and we are rewarded for work performed that exemplifies our ethical and quality behaviours.

1.4 Transparency

We are honest with our colleagues, our business partners, our customers, and the public to maintain open communication channels.

1.5 Accountability

We hold ourselves to the standards set for companies like ours and follow the laws, regulations, and other rules that apply to us.

1.6 Responsibility

We take pride in using good judgment and ethical behaviour when we make decisions for ourselves and our Company. When we do make a mistake, we accept responsibility and strive to solve the problem.

1.7 Openness

We work cooperatively, recognizing and giving appropriate credit for the contributions of others. We encourage open communication amongst our colleagues and emphasize a continual dialogue.

2. Using the Code of Conduct

At Delta Pharma-AL, we take pride in distributing and marketing products that restore health and protect against disease. Because of the importance of our work and the lives we have the potential to affect, we aim to conduct business ethically in all that we do.

Our Code of Conduct is a guide to help us achieve our goals with integrity. You should turn to it whenever you face an uncertain ethical decision or witness behaviour that might violate



our standards or the law. This document lays out several common issues that you may encounter in the workplace and provides guidance for how to navigate those situations. **It also points you to resources—such as related policy documents and people who can clarify them if necessary—you should turn to if you are still unsure of the right course of action.** This Code applies to all employees, contract employees, officers, and directors. Delta Pharma-AL also expects that our suppliers, agents, business partners and consultants will follow similar principles.

2.1 Respect for the Individual

We are committed to create and maintain a fostering a stimulating, creative and non-discriminatory workplace environment for all our employees, while respecting personal dignity.

Our company is committed to promoting diversity, convinced that the distinctive identities of our employees are a source of strength and a key ingredient in the success our business; supports equality of opportunity for each employee or job applicant in terms of recruitment, access to training, compensation, welfare and career development. Skills, experience and personal aptitude are the only factors taken into account; prohibits all forms of discrimination on grounds such as: gender; age; origin; religion; sexual orientation; physical appearance; health; disability; trade union membership. Prohibits any conduct that may harm personal dignity. No employee should be subject to any form of harassment.

2.2 Respect for Privacy and Personal Data Protection

All our employees, and third parties with whom Delta Pharma-AL has dealings are entitled to their privacy. Delta Pharma-AL is committed to protecting their personal data. "Personal data" means any information that can be used to identify an individual, whether directly or indirectly (e.g., name, date of birth, social security number, photograph, e-mail address, computer ID). Personal data protection gives individuals whose data are held the right to control the collection, processing, use, disclosure, and storage of data relating to them. These data must be used fairly and for a specific, clear and legitimate purpose, and must only be retained for as long as is necessary for the purpose for which they are processed, according to the applicable law in Albania.

2.3 Open-Door Policy

Delta Pharma-AL pursues an open-door policy, which brings together our values of integrity, responsibility, and openness. It means that managers at Delta Pharma-AL are here to listen to suggestions about ways to improve the workplace, address concerns, and help the employees who report to them find solutions. Here at Delta Pharma-AL we seek to foster an atmosphere of teamwork and mutual respect between all levels of personnel at our organization. It also means that all employees should feel comfortable raising concerns or making reports about potential misconduct.

If you are bothered by behaviour you see at our company, you should speak up. Employees will never face retaliation for making a report in good faith. A good faith report means your



intentions are honest, and you report all that you know about the event. Retaliation is any act against someone who makes a good faith report or participates in an investigation. It can include demotion, harassment, firing, or an unwelcome change in job responsibilities because of a person making a report about real or perceived misconduct or participating in an investigation. All forms of retaliation are prohibited. If you believe that you, or another colleague, have faced retaliation for raising a good faith concern, you should contact Compliance Officer.

2.4 Why is it important to report?

When you report potential wrongdoing or raise questions about ethical concerns, it helps Delta Pharma-AL correct problems before they become widespread issues for our Company, or the individuals involved. Your reports and questions also help our Company refine its policies and training to clarify areas that are commonly misunderstood. Most importantly, coming forward with your concerns gives us the opportunity to make our Company a better, more transparent, and more ethical place to work.

2.5 Confidentiality

No matter how you choose to report, rest assured that Delta Pharma-AL will do its best to maintain your confidentiality to the extent permitted by law. Our Company will also always uphold our commitment to non-retaliation.

2.6 Investigations and Discipline

Delta Pharma-AL takes violations of our Code and the law seriously. Our Company will promptly and thoroughly investigate all allegations of wrongdoing. Code violations may result in serious disciplinary action, which may include termination of employment. As necessary, Delta Pharma-AL may also report violations to the appropriate authorities for civil and/ or criminal prosecution. Be aware that knowingly making false accusations is also a violation of our Code.

2.7 Further Expectations for Managers

If you are a manager at Delta Pharma-AL, you have additional responsibilities for setting a tone of compliance within our Company. Leading by example is the most effective way to promote a culture of compliance. Also, ensure the employees who report to you are familiar with our values, Code, and policies, and know where to turn when they have questions. Maintain an *open-door* environment where employees feel safe and comfortable coming to you with questions or reports. If issues are beyond your ability to solve, be sure to take the necessary steps to report them to someone who can intervene. Finally, communicate regularly both with the employees who report to you and to others at Delta Pharma-AL about ethics and compliance so that it is a regular part of our culture.



2.8 Product Safety and Quality

Our number one commitment will always be to the people who use our products. We are ethically and legally obligated to ensure the quality of our products meets the highest safety standards. As such, Delta Pharma-AL is committed to the following activities:

- Employing an adequate number of qualified persons to ensure that the quality of the products remains intact.
- Conducting all operations under properly controlled and monitored conditions.
- Ensuring that products are maintained and distributed under controls that are designed to keep controlled substances and other susceptible products secure from theft or misuse.
- Segregating and withdrawing from distribution any pharmaceutical product that is damaged or that fails to comply with the approved specifications of the product.

Delta Pharma-AL takes all product complaints of any kind seriously, which means that we investigate them quickly and thoroughly. This includes responding promptly and responsibly to adverse drug experiences.

You must report any suspected adverse drug experience immediately to Pharmacovigilance Department, in accordance with our Company's SOP.

2.9 Pricing

Delta Pharma-AL will always make its own decisions about our Company's pricing policies and our dealings with customers. As Delta Pharma-AL's employees, we have a responsibility to avoid any discussion of pricing or territorial issues with competitors or industry representatives. Similarly, we never discuss our pricing, territorial strategies, and customer relationships with others.

2.10 Healthcare Laws and Regulatory Requirements

As a pharmaceutical distribution company, Delta Pharma-AL is committed to improving health and wellness. As part of that duty, Delta Pharma-AL is careful to follow all of the various rules and regulations specific to our industry. These laws and regulatory requirements serve a range of purposes, such as eliminating fraud and ensuring that medical judgment doesn't suffer from improper influence. Our focus on integrity and accountability means that we take care to meet or exceed the requirements for advertising and other required product regulations. You must be familiar with the standards that apply to your role.

2.11 Marketing Integrity

As part of Delta Pharma-AL's commitment to fair competition, we abide by all laws that apply to our marketing activities. This means we do not use unfair or deceptive sales or marketing practices such as:

- False or misleading advertising, or any other form of misrepresentation related to sales
- Bribing competitors' or customers' employees, distributors, or healthcare professionals
- Unfair, misleading, or untrue comments about competitors' products

Those of us in sales, marketing, medical, and regulatory functions must be familiar with Delta Pharma-AL policies and procedures on promotional programs, product samples, and other relevant topics.

2.12 Fair Competition

We believe in competing vigorously, but always fairly. The products that Delta Pharma-AL distributes in the market succeed based on quality, not through belittling the competition or breaking the rules. This means we do not disparage or make untrue statements about our competitors' products or services. Instead, we stress the advantages Delta Pharma-AL offers, making only fair and accurate comparisons between our offerings and those of our competitors. Because we value accountability, we concentrate on anticipating and satisfying our customers' needs, and we will not seek to limit the competitive opportunities of our rivals in deceitful or fraudulent ways.

If a competitor attempts to engage you in a discussion related to any topic that seems to be about restricting competition make it clear that you do not wish to participate. Leave the conversation immediately and report the matter to your manager.

2.13 Protecting Third Party Information

In this field, information is critical to success. We work hard to protect our own exclusivities and information, and we do the same for the third parties with which we work. Whether we receive the information inadvertently or through a relationship with another company, we have a duty to use it only in ways that we have written permission to use it. If you receive another company's confidential information and you do not believe (or are not sure) that you have permission to have it, contact your manager immediately.

2.14 Gathering competitive information

Most of the information required for successful intelligence analysis can be found in the "public domain."

A key role you can perform is to assist in gathering this publicly available information.

Sources that you may find useful include (but are not limited to):

Published materials – e.g., local newspapers and press accounts

Financial documents, such as competitor company annual reports

Published financial information and broker reports



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Brochures, reports, other information published by or about competitors that can be collected at trade shows, exhibits, etc.

Published market surveys and consultant reports

Business contacts you have may also be valuable sources. These include:

Customers

Distributors of competitive products

Advertising agencies

Market research firms

Casual or social acquaintances

Suppliers

Trade associations

You may also encounter situations where competitive information can be obtained more directly; for example, interviewing a new employee that recently worked for a competitor, or arranging a meeting directly with a customer. When speaking with potential sources, it is important to respect any prevailing nondisclosure agreements they may have with current or former employees or other parties. We urge you to exercise extreme caution in talking directly to competitors. In addition, remember it is never acceptable to talk to competitors about pricing or price-related topics.

2.15 Promoting Anti-corruption

At Delta Pharma-AL, it is unacceptable to pay a bribe, kickback, or facilitation payment to anyone-whether a public official or in the private sector-to win business or any other competitive advantage, as described in Anti-bribery policy of the company.

2.16 Preventing Money Laundering

Delta Pharma-AL is committed to avoiding any involvement in money laundering, which is an attempt to make funds obtained illegally look legitimate. It is important that we know and comply with all laws and regulations aimed to halt money laundering. This means we must make payments for goods and services via approved, transparent, and documented payment practices. We must be vigilant and exercise good judgment when dealing with unusual customer transactions, including requests to route payments through a third party. Only conduct business with customers that are willing to provide you with proper information so that we can be sure that the transaction is legitimate.

2.17 Giving and Receiving Gifts and Hospitality

Delta Pharma –AL prohibits providing anything of value to a person with the intent of influencing that person’s recommendations or purchases of healthcare products or services. No gifts, meals, entertainment, or anything else of value may be directly or indirectly given by personnel to anyone in violation of law. Company personnel may not solicit or request gifts, entertainment or other business courtesies from people or organizations doing business with.

Occasional, unsolicited gifts and business courtesies, such as meals and entertainment, are permissible if they are customary and common business courtesy; modest, based on local standards; and not excessive in value.

No gifts or entertainment may be accepted that would likely or potentially result in an expectation or belief of the creation of a personal obligation, or that could be perceived as influencing your judgment or decision.

Delta Pharma-AL does not make political contributions in Albania. You may not use company resources for any political event or political contribution.

2.18 Fair Labour Practices

We believe that upholding human rights is a direct reflection of our commitment to ethical business practices. As such, we comply with all applicable wage and labour laws. We respect the rights of our workers to join (or not join) labour unions, and we will never use child or forced labour in our operations. Moreover, we do not tolerate suppliers who violate these principles, since their work is a direct reflection on our ethics. If you have reason to believe anyone we work with is violating these standards, please inform Compliance Officer at once.

2.19 Handling Imports and Exports

As we must deal with international companies that wish to have their products distributed in our country, we have a duty to understand the various import and export laws that apply to our international trading activities. Before importing any products, we must be sure that country of delivery has been verified and that the proper documentation is in place.

Delta Pharma-AL complies with the regulations and economic sanctions programs administered by the Albanian Government. Delta Pharma-AL employees are prohibited to open an account, establish, or maintain a relationship, or engage in any direct or indirect transactions or dealings with any “blocked” government, entity or individual or engage in or facilitate any transaction or activity that evades or avoids, or has the purpose of evading or avoiding, applicable sanctions.



3. Workplace, Health and Safety

3.1 Safe Working Conditions

Delta Pharma-AL strives to always provide safe working conditions. Each of us contributes to this goal by:

- following all safety policies and procedures
- reporting any unsafe or questionable conditions as soon as we are aware of them
- using vehicles and equipment only for their intended use
- speaking up when we have questions about how something works

3.2 Threats, Violence and Weapons

We also keep our workplace safe by keeping threats, violence, and weapons out of it. Weapons of any type are not permitted on our premises, consistent with local law. Violence, threats of violence, and bullying are also prohibited at Delta Pharma-AL. If you experience or witness any acts of violence or bullying (including threats), report it immediately to Compliance Officer. If you believe anyone's immediate safety is at risk, do not hesitate to contact your manager or the local authorities.

3.3 Substance Abuse

The use of drugs or alcohol on the job can impair our ability to safely perform our jobs. For this reason, we may never use alcohol, illegal drugs, controlled substances, or medication in any way that might detract from our focus or clarity of mind. If you have a particular medical situation, you think warrants special consideration, you should discuss it with Compliance Officer. In addition, we should never possess drugs that we do not have a legal right to possess while on Delta Pharma-AL's property or while performing work for Delta Pharma-AL. We should never sell or distribute these substances, whether we are doing Company business, or whether we are on or off Company property.

3.4 Harassment

Delta Pharma-AL strives to create a work environment that is productive, healthy, safe and free from unlawful discrimination, harassment and retaliation. Prohibited sexual harassment includes unwelcome sexual advances, propositions, requests or demands for sexual favours, and other verbal, visual or physical conduct of a sexual nature. Harassment based on other personal characteristics or traits, such as a person's age, race, colour, religion, sex, sexual orientation, national origin, citizenship, marital status, mental or physical disability or handicap, military service or veteran status, or any other characteristic protected by law, also is prohibited.



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3.5 Email and Internet Use

Delta Pharma-AL provides us with the technologies we need to do our jobs. It is important that we remember that these devices and systems (and the information they contain) belong to our Company. As such, we need to be careful that we use them only for their intended business purposes. This includes computers, phones, e-mail system, Internet connection, and any other electronic devices or related services. Keep in mind that all the usual standards of business conduct apply to these technologies, so you should never use them for any illegal, disruptive, offensive, or harmful purpose. For example, harassment, slurs, and sexually explicit content are not acceptable in our workplaces, so Company technologies may never be used to send or display them. Likewise, Company technologies may not be used for personal mass mailings, outside business ventures, political or religious purposes, or to leak confidential information. Our Company also reserves the right to periodically inspect and monitor employee e-mail and Internet use. Users should have no expectation of personal privacy in their use of Company communication systems, to include information sent or received by Delta Pharma-AL communications systems.

3.6 Social Media and Networking

Delta Pharma-AL recognizes that social media— including sites such as Facebook, Instagram, Twitter, is an increasing part of many of our personal lives. Social media can also help shape the way the public views our products, employees, vendors, partners, and customers.

Because our online activities can affect our Company’s reputation, Delta Pharma-AL has established the following guidelines to ensure we maintain our integrity and professionalism:

- Always keep the rest of our Code and values in mind.
- Unless it is part of your job description to do so, do not engage in social networking while on Company time or while using Company technologies.
- Do not present yourself as a Company spokesperson unless you are specifically authorized to do so. If you do mention Delta Pharma-AL in an online post, make it clear that you are a Delta Pharma-AL employee and that your views are your own.
- Never disclose confidential or proprietary information in any online forum.

3.7 Confidential and Proprietary Information

One of Delta Pharma-AL’s most important assets is our knowledge and experience— information that could be useful to competitors or harmful to our Company if disclosed. Our confidential information and intellectual property is a valuable resource, so we are each accountable for protecting it from loss, theft, and misuse. Our confidential information includes categories such as:

- Customer lists



- Terms, discount rates, or fees/prices offered to particular customers or suppliers
- Marketing or strategic plans
- Software, tools, and other system or technology developments
- Budgets and financial information

Do not discuss confidential information in places where you can be overheard, such as elevators and restaurants, or open areas such as break rooms. In addition, do not leave confidential information, computers, mobile phones, or smart phones unattended. At a minimum, always password-protect your devices.

These obligations also apply after your employment with Delta Pharma-AL ends. When you leave our Company, you must not disclose or use confidential information. In addition, you must return all copies of materials or devices containing confidential information in your possession.

3.8 Avoiding Conflicts of Interest

Using good judgment and displaying ethical behaviour means avoiding conflicts of interest—situations in which our personal interests interfere with our ability to perform our jobs without bias. We all have a duty to avoid interests, investments, or associations in which a conflict of interest might arise. Because we value transparency and accountability, we handle situations that could appear to be conflicts of interest in the same way that we handle actual conflicts. Our Company can take steps to resolve conflicts of interest, as long as it learns of them promptly. The following are examples of situations that may create conflicts of interest:

- Having an ownership interest in any customer, distributor, or competitor of Delta Pharma-AL, or in any research organization engaged by our Company. If a close family member has an ownership interest in one of these companies, may also be a conflict.
- Acting as an officer, director, employee, or consultant on behalf of any of Delta Pharma-AL customers, distributors, competitors or research organizations.
- Competing with our Company's business or operations.
- Taking part in an activity that provides you or others with kickbacks or unauthorized fees in connection with our Company's business, products, or services.
- Having an outside activity that is so substantial that it compromises your ability to devote appropriate time and attention to your job at Delta Pharma-AL.
- Spending an excessive amount of time on personal activities during work hours. This includes soliciting other Delta Pharma-AL employees.
- Supervising, evaluating, or reviewing a family member with respect to job evaluation, pay, benefits, or promotion.



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3.10 Keeping Accurate Records

Although it may not seem that our daily work affects Delta Pharma-AL's books and records, we each contribute to the creation of complete, accurate records.

We all have a duty to ensure that records and documents are an honest, transparent reflection of our Company's business.

We should never record false, misleading, or intentionally incomplete information in our Company's books and records. Similarly, we must not create or maintain any "off-the-record" funds for any purpose. Falsifying records or documents will result in disciplinary action and may result in civil and criminal penalties for our Company and individual violators.

If you notice irregularities, or incidents of fraud by individuals you should immediately report your observation to the Compliance Officer. Please keep in mind that you are protected from retaliation when making a good faith report.