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## ADWIA Employee Code of Conduct

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## **1 Introduction**

- 1.1 ADWIA is committed to fostering an organisational culture of ethics and a harmonious and inclusive work environment, anchored in the values of commitment to quality, integrity, responsibility, transparency and respect for people and the environment.
- 1.2 In order to achieve its objectives, ADWIA and all its subsidiaries must have a strong corporate culture that embodies the values of the organization. This Employee Code of Conduct was established to set the corporate standards for the board, officers, and employees of ADWIA and all its subsidiaries. Further reference to “employees” should be interpreted to mean employees at ADWIA and all its subsidiaries.
- 1.3 No code or policy can anticipate every situation that may arise. Accordingly, this Employee Code of Conduct is intended to serve as a source of guiding principles for employees.

## **2 Applicability**

- 2.1 This Employee Code of Conduct sets out standards on how ADWIA’s board, officers and employees should behave toward all stakeholders. The same holds for all employees at ADWIA’s subsidiaries. All employees have a duty to uphold these standards and to act accordingly at all times. Senior officers at ADWIA and its subsidiaries are expected to lead by example in this regard.
- 2.2 This Code of Conduct also applies to anyone acting on ADWIA’s behalf including contractors, distributors, and other third-party service providers. A copy of this Code should be provided to them.

## **3 Reporting / Speaking Up**

- 3.1 ADWIA encourages a collaborative, speak up culture where employees ask questions, share challenges, and raise issues without fear of retaliation and is committed to treating reports seriously and investigating them thoroughly.
- 3.2 Employees, stakeholders and all third parties are encouraged to report suspected unethical, illegal, or suspicious behavior as soon as they become aware of it. ADWIA does not tolerate retaliation against anyone who makes a good faith report or otherwise assists with an investigation or audit.
- 3.3 To report an ethics breach, incident or concern please contact the Head of Human Resources or the Ethics and Compliance Officer. It is also possible to report anonymously in line with ADWIA’s Whistle-Blowing Policy.

3.4



Whistle Blowing  
Policy Adwai V02.do

Employees are encouraged to report any ethics breach, incident, or concern to their line manager in the first instance if possible. This will ensure that safety and product quality related concerns are handled in a timely and efficient manner by those responsible for ensuring resolution.

#### **4 Integrity and Honesty**

- 4.1 Employees are expected to act with integrity and honesty in their dealings with all parties with whom ADWIA is connected and in all internal matters.
- 4.2 No employee should act in a manner that could harm ADWIA's reputation.

#### **5 Equal Opportunity and Human Rights**

- 5.1 ADWIA is committed to respecting human rights in its operations and complying with the laws of the countries in which it does business in. Furthermore, we encourage and support our suppliers and other business partners in their efforts to act in accordance with internationally recognized human rights standards.
- 5.2 ADWIA nor any of its employees shall discriminate against people or violate human rights on the basis of race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status such as disability, age, marital and family status, sexual orientation and gender identity, health status, place of residence, economic and social situation.

#### **6 Compliance with Applicable Laws and Regulations**

- 6.1 Recognition of the public interest is a permanent commitment of ADWIA in the conduct of its business. ADWIA's activities must always be in compliance with all applicable laws, statutes and regulations. This includes, but is not limited to, laws and regulations that prohibit bribery and corruption and impose trade sanctions or protect privacy rights.
- 6.2 **Anti-bribery and anti-corruption laws**

ADWIA prohibits all forms of bribery and corruption, whether by employees or business partners. Employees and business partners must never offer, promise, authorize, or provide a payment or benefit that is intended to improperly influence a government official, healthcare

professional, or any other person, including commercial entities and individuals, in exercising their responsibilities.

ADWIA Anti Bribery and Corruption Policy covers this requirement in more detail and all employees should be guided by it.



Anti-Bribery and  
Anti-Corruption Policy

### 6.3

#### **Global trade compliance and trade sanctions laws**

ADWIA aims to comply with trade sanctions and import/export restrictions imposed by governments that are applicable to its activities. ADWIA Sanctions Policy covers this requirement in more detail and all employees should be guided by it.



Sanctions Policy  
Adwia.docx

### 6.4

#### **Prevention of Money Laundering**

ADWIA complies with anti-money laundering laws. Employees must never knowingly facilitate money laundering or terrorist financing and should exercise due care to prevent inadvertent use of ADWIA's business activities for these purposes.

### 6.5

#### **Privacy and Protection of Intellectual Property**

ADWIA complies with the local and international privacy laws requirements. All employees sign an agreement that contains provisions for information confidentiality and non-disclosure.

Information relating to employees, customers, vendors, suppliers or any third parties obtained through employment with ADWIA must only be used for the proper performance of the employee's duties. Confidential information should only be discussed within ADWIA on a "need to know" basis and should never be discussed externally. These obligations apply to all employees, including those who leave ADWIA.

Employees should make all efforts to appropriately protect ADWIA's intellectual property rights and to respect the intellectual property rights of third parties.

## **7 Fraud Prevention**

7.1 ADWIA and its subsidiaries take the most serious view of any attempt to commit fraud by employees, contractors, their employees and any other third parties acting on behalf of ADWIA or its subsidiaries. Fraud is an ever-present threat to our resources and hence must be a concern to all employees.

7.2 Employees involved in impropriety of any kind will be subject to disciplinary action, including prosecution, if appropriate. ADWIA and its subsidiaries treat attempted fraud as seriously as accomplished fraud.

7.3 Employees suspecting any fraudulent activities by any party are required to report it in line with para 3 of this Code “Reporting/Speaking up”.

## **8 Interactions with Health Care Professionals and Providers**

8.1 ADWIA and its employees’ interaction with healthcare professionals and providers must be intended to ensure the effective use of ADWIA’s medicines and to enhance patient care. This can include advancing medical research, enhancing medical knowledge or practice management, or gathering necessary feedback about our medicines.

8.2 ADWIA and its employees must only engage the services of healthcare professionals and providers when they are legitimately needed and must not pay more than an appropriate market rate for the services rendered.

8.3 More details in this regard are contained in ADWIA’s Anti- Bribery and Anti-Corruption Policy attached in para 6.2 and all employees should be guided by it.

## **9 Gifts and Sponsorships**

ADWIA and its employees must not enter into business relationships or offer or provide, cash, gifts, hospitality or anything else of value, to induce or reward favourable decisions about our products and services. This prohibition also applies to receiving gifts, hospitality, and other items of value.

9.1

9.2 More details in this regard are contained in ADWIA’s Anti- Bribery and Anti-Corruption Policy attached in para 6.2 and all employees should be guided by it.

## **10 Contributions and Donations**

10.1 ADWIA and its subsidiaries shall not donate or make contributions, whether in cash, kind, or by any other means, to support any political parties or candidates. Charitable contributions or donations to causes and organizations that are not politically affiliated are permitted.

10.2

More details in this regard are contained in ADWIA’s Anti- Bribery and Anti-Corruption Policy attached in para 6.2 and all employees should be guided by it.

## **11 Conflicts of Interest**

11.1 Employees must not have outside commercial interests that conflict, or appear to conflict, with the interests of ADWIA. A conflict of interest occurs when an employee’s personal interests – family, friendships, financial, or social factors – could compromise his or her judgment, decisions, or actions in the workplace.

11.2 Employees must immediately make their line manager aware of any situation that involves, or may reasonably be expected to involve, a conflict of interest with ADWIA. The line manager is expected to assess the conflict and take necessary action to mitigate the risk in the conflict situation. If the conflict is of a long-term nature, the line manager should seek the advice of the Ethics, Risk and Compliance to mitigate the issue and to document this conflict.

## **12 Environment**

12.1 The company is committed to operating in an environmentally responsible manner, from the provision of products and services to the operation of its offices and facilities, selection of suppliers and other business activities.

12.2 ADWIA complies with all applicable environmental laws and regulations as well as self-directed commitments to sustainable practices and environmental protection such as IFC Performance Standards and EBRD’s Environmental and Social Policy and Performance Requirements to name a few.

## **13 Product Safety and Quality**

13.1 At ADWIA we are committed to ensure that the quality of our products meets the highest safety standards.



13.2 ADWIA is committed to operating and maintaining our manufacturing facilities and equipment in a manner that is suitable for the intended use and follows good manufacturing practices.

13.3

We Conduct our operations under properly controlled and monitored conditions. Assuring the effectiveness, identity, strength, quality, purity, labelling, and packaging of products.

#### **14 Health and Safety**

14.1 ADWIA conducts business in accordance with applicable local health and safety laws, regulations, policies, procedures, and best practises such as IFC Performance Standards, World Bank EHS Guidelines and EBRD E&S Policy and Performance requirements. Employees are expected to perform their work in compliance with such requirements and to apply safe work practices at all times in all locations.

14.2 Applicable safety and health requirements must be communicated to visitors, customers, or contractors at any company location.

14.3 Employees are required to report at the earliest opportunity workplace injuries, illnesses, or unsafe conditions, including “near-misses” in line with EHS and operational risk incident reporting procedure available at the respective functions.

#### **15 Appropriate Use of ADWIA Resources**

15.1 Employees shall use ADWIA’s resources in a responsible and ethical manner and not for private purposes.

The use of ADWIA assets including computers, mobile devices, information technology hardware and software, vehicles, facilities, machinery, raw materials, inventory, intellectual property, supplies and other assets should be in a responsible and ethical manner and not for private purposes.

#### **16 External Communication and the use of internet & social media**

16.1 To preserve and maintain the integrity of communications, no employee, other than the CEO and those designated from time to time as spokespersons by the Board of Directors or by the CEO, may discuss matters involving ADWIA or its subsidiaries, employees, shareholders or any other third party with any member of the news media.

16.2 ADWIA respects the right of employees to use social media for personal and professional purposes. Employees are accountable for any information they publish online or on social media and. As such employees should be careful not to share confidential information about ADWIA, its subsidiaries, employees, shareholders or and any other third party or post comments or pictures that could harm ADWIA’s brand, reputation or commercial interests.



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## **17 Fair Dealings**

- 17.1 Employees should endeavour to deal fairly with the ADWIA’s patients, suppliers, competitors and their colleagues. Employees must never take unfair advantage of others through manipulation, concealment, abuse of confidential information, misrepresentation of material facts or any other unfair dealing practice.

## **18 Accurate Books and Record Keeping**

- 18.1 ADWIA keeps accurate books and records that maintain the integrity of its financial reporting, support internal decision-making and strengthen our reputation with stakeholders.

## **19 Compliance with this Code**

- 19.1 All employees are expected to comply with and strictly adhere to the standards of conduct contained in this Code and underlying policies and procedures. When in doubt, this Code casts the responsibility on the Employee to seek clarification and guidance as to the proper course of conduct from their line manager or the Ethics, Risk & Compliance Officer.

- 19.2 Furthermore, this Policy also applies to all temporary and contract personnel, consultants, contractors, trainees, vendors and service providers of ADWIA or any of its subsidiaries who should be provided with a copy of this Code.

Failure to follow the Employee Code of Conduct may result in disciplinary action up to and including termination of employment.

## **20 Implementation**

- 20.1 HR is responsible to ensure that the Employee Code of Conduct is disseminated to all employees. Where needed it should be translated to local language.
- 20.2 HR is required to conduct annual awareness sessions to all employees to explain the Code and the Company’s expectations.
- 20.3 Records containing the awareness training dates and list of attendees along with a copy of the presentation approved by the Compliance Officer should be maintained with HR.
- 20.4 A signed annual affirmation certification (template in Appendix. A) by each employee is required annually. HR should keep such copies on file.

- 20.5 Heads of each Function should ensure that third party service providers are given a copy of this Code and that an acknowledgment re. compliance with the Code is on file.
- 20.6 Internal Audit, as part of the normal audit process shall review compliance with the provisions of the Employee Code of Conduct.

## 21

### **Annual Affirmation**

A signed annual affirmation certification (template in Appendix. A) by each employee is required annually. HR should keep such copies on file.

## 20

### **Review and Amendments to the Code**

The Code of should be reviewed periodically at least bi- annually. Amendments to the Code of Conduct is delegated to the Chair of the Audit and Risk Committee, who in consultation with management will report of any amendments to policy to the Board who are the final approval authority.



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**Affirmation of compliance with ADWIA Employee Code of Conduct**

I \_\_\_\_\_ state that to the best of my knowledge and belief,

- I have read and understand the standards and policies contained in the Employee Code of Conduct
- I am aware of the applicability of the Employee Code of Conduct.
- I also understood that there could be additional policies or laws specific to my job.
- I will adhere to the Code in carrying out my duties as employee of ADWIA.

Signature: .....

Name: .....

Date: .....

Place: .....