

# CODE OF CONDUCT



**ALKALOID**  
SKOPJE

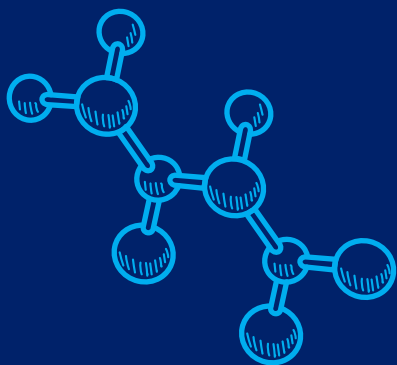
*Health above all*

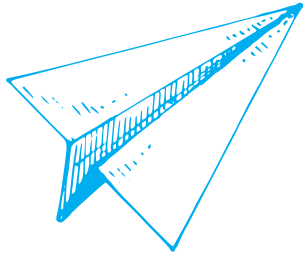


# INTRODUCTION

In performing its business operations, Alkaloid uses the highest ethical norms and standards. Code of Conduct is a key element in building an ethical corporate culture and guarantees sustainable growth and development of the company.

We are convinced  
that ethical running  
of business is  
a prerequisite  
for continuous  
personal and  
professional  
success





## OUR MISSION

We continuously strive for a healthier world, superior quality of products and services, as well as high professionalism and continuous success.

It is our highest priority to protect the interests of all stakeholders. Our basic commitment is to take care of health and quality of life of every person, the health care system and the environment.

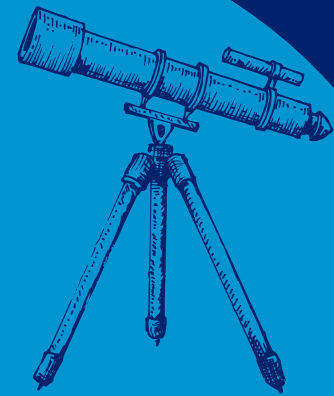
We are committed towards continuous improvement of human health that is reflected through our motto:

*Health above all*

*Health above all*



## OUR VISION



Alkaloid, as a globally oriented company, strives to accomplish high goals and achievements, which will enable high competitiveness and market positioning. We are constantly open to building new markets and new partnerships, production and placement of superior quality products, applying the latest technologies and business standards.

MESSAGE FROM  
THE CHIEF  
EXECUTIVE OFFICER  
AND PRESIDENT OF  
THE MANAGEMENT  
BOARD OF  
ALKALOID AD  
SKOPJE

\* This document entitled "Code of Conduct" is not an employment contract and it can be changed by the Management of Alkaloid at any time.



Dear colleagues,

Alkaloid products are part of the daily lives of millions of people in countries where the company has established business operations. Every product that bears the logo of Alkaloid is a synonym for quality, tradition and hard work of over a thousand employees and generations of Alkaloid, who have built the company values before us, so the responsibility to maintain that credibility is also enormous.

The image of every company is not built upon expensive marketing campaigns or colorful product packaging. That image, those company values and the credibility reflect the company's culture, whereby rules of conduct should be precisely defined for every employee and associate, who is in some way involved in the company processes at any level. Therefore, we have defined the Code of Conduct that summarizes rules of conduct in the workplace and should be a reference for all employees regarding their more successful management of daily work challenges in a professional and ethical manner.

All of us, as part of the globally oriented story of Alkaloid, should contribute to successful implementation of the company processes and each employee with his behavior should manifest his strong will, intention and willingness to contribute to smooth and even more efficient implementation of the company's vision and mission. For me, as the CEO of Alkaloid, there is no higher priority than a highly professional and ethical approach to the work by the employees of the company, regardless of the country of origin and their job.

Thank you for being part of the success story of Alkaloid and I am looking forward to future joint greater successes and even higher achievements!

Alkaloid AD Skopje  
Zhivko Mukaetov  
Chief Executive Officer and  
President of the Management Board



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## OUR CORE VALUES

- » People above all
- » Integrity and honesty
- » Creating the best outcomes together
- » Value based leadership





# PEOPLE ABOVE ALL

We embrace different views of people with **respect** and dignity. We promote diversity with admiration and empathy, irrespective of the person's position within the company, background, age, gender, values, views or interests. We recognize people's differences as chances to learn and approach things differently.

In order to show that everyone is important, we must be completely **transparent** to colleagues, clients, associates, co-investors, external partners, government institutions, the community, and so on.

Transparency breeds **trust**, and trust is the foundation and core stone on which we rely. This trust extends to anyone who interacts with us on any level and it is crucial when establishing and developing both, internal and external relationships since it is the basis of **good communication**.

We favor **empathy** and **active listening** to understand another person's perspective or circumstance whether you agree with this person or not. Possess a desire to know and understand others.

We are actively involved in community and charitable events as an organization and encourage our employees to give back to our community as it has given so much to us. Generously donate our resources and believe it is our responsibility to **give back to the communities in which we live** and work.



*People  
above all*

We accept  
people's different  
views with  
respect and  
dignity

A decorative graphic on the left side of the page. It features two overlapping circles: a light blue circle on top and a dark blue circle on the bottom. The dark blue circle contains the text 'Integrity & Honesty' in white script. To the left of the circles is a light blue area with a pattern of thin, dark blue diagonal lines.

For us  
integrity is the  
foundation  
of good  
leadership

*Integrity  
& Honesty*

## INTEGRITY AND HONESTY

We always strive to do the right thing and carry out what we say we will. We try to gain the **trust** of others through consistent behavior, in accordance with the high ethical norms, values and commitments of the company. We take **responsibility for our activities**. We have a strong sense of what is right and what is wrong and we always strive to do the right thing.

**Integrity** for us is the foundation of good **leadership**, which shows that this value is the basis for gaining trust with all our stakeholders. Working with integrity means that you always have to do the job properly, even when it is hard to attain.

We are all Alkaloid ambassadors, representing the company at different levels and through various interactions with all stakeholders. We take responsibility to act as a model by building strong and sustainable relationships within the organization, based on high **moral and honesty**. Integrity for us is a guiding principle at all levels and in all activities within Alkaloid and we work hard to create an environment and work climate where integrity will flourish.

Acting with integrity means ensuring that every decision is made on the basis of the highest ethical and moral principles. **Trust and honesty** are key elements of the concept of integrity in Alkaloid. In the workplace, employees who act with integrity always tell the truth; they do the right thing, even when no one is watching.

# CREATING THE BEST OUTCOMES TOGETHER

Our people constantly exceed expectations. They move forward and take action to meet the needs of customers, they strive to take an extra step for each of their task, activity or project.

Our employees are **leaders** who show **commitment and passion** for their work, guided by their own example and focused on the aim.

We rely on **tradition**, built and maintained for decades, we are agile, and we accept all changes and see their benefits.

Our people always give their best at work, by constantly learning new skills and competence, which helps the company to constantly move up.

We always strive to be **innovative** and to stimulate and reward the creativity and entrepreneurship of our employees.

One of the keys to a successful business is active and complete involvement and engagement of employees. Line managers appreciate the level of commitment our employees put in their work and help them be proud and aware of what they achieve for the company. Our employees are self-motivated to work hard towards achieving the common goal.



## VALUE BASED LEADERSHIP

Our **leaders** also influence the values in our company. In order to develop properly, leaders need to impose values regarding responsible leadership, which is a combination of commitment, determination and understanding for employees. Values are the guiding principles in our company. We encourage the leaders in our company to choose their employees on the basis of values in addition to competence and **if values in life correspond with those of the company, we talk about an ideal relationship.**

Our leaders always **start from themselves**, think about what they stand for and what their values are. They are constantly working on getting to know themselves, to be sure that they can influence themselves first, so that they can influence others as well.

Our leaders achieve **balance**, that is, capability to see situations from various angles and points of view in order to gain full understanding. Balance means viewing all sides and views with an open mind. ►►



Value  
based  
leadership

Our leaders are **truly self-confident**, that allows them to see and accept themselves exactly as they are. They recognize their strengths and weaknesses and strive for continuous improvement. Being truly confident, our leaders are also aware that there will always be people who are more competent, accomplished, successful or similar to them, but they are also aware of where they belong, while recognizing and appreciating differences.

Our leaders never forget who they are and where they come from. They remain modest even when they achieve great success in the company. **True modesty** helps us appreciate every person we meet and to treat everyone with respect.

Our leaders need to recruit and strive to retain the best talent in the company so that we remain competitive and successful. To do so, we encourage them **to nurture meritocracy**, that is, to hire, reward and promote the best people, based on their merit and contribution to the work.

As leaders, we are responsible to ourselves, our employees, and our superiors. **Moral and ethical behavior begins with those at the top** and is mirrored downward, which encourages and builds a strong corporate culture at Alkaloid.



We are talking about responsible leadership, which is a mixture of commitment, determination and understanding for employees

## OUR CODE OF CONDUCT

- » What is Code of Conduct?
- » Why do we have the Code?
- » Who should follow the Code?
- » Our role





## WHAT IS CODE OF CONDUCT?

The Code of Conduct (hereinafter referred to as the Code) is built upon our **core values** and its primary purpose is to guide us to the desired behavior.

The Code, alongside our **core values** –The Integrated Management System Policy of Alkaloid (corporate policies / procedures) and, of course, the legislation in the environment where we work, is one of the basic pillars upon which the positive reputation of our company is built.

## WHY DO WE HAVE THE CODE?

The Code helps us make the right decisions and take appropriate action. Adherence to the Code creates an environment in which we can do our best and be proud of the work we do, the challenges we overcome and the successes we achieve – all because we work ethically, legally and with integrity.

The code clearly states the expectations of Alkaloid for our ethical behavior, sets the standards for professional behavior and provides us with practical guidance, examples and references for additional useful information (corporate policies / procedures, legislation, Integrated Management System Policy of Alkaloid, etc.)

## WHO SHOULD FOLLOW THE CODE?

All employees of Alkaloid, as well as capitally affiliated its subsidiaries and representative offices, are obliged to follow and act in accordance with the Code.

It is the responsibility of every employee to know and respect the Code. Alongside our **core values** and corporate procedures, defined in the integrated management system of the company, the Code helps us make the right decisions and take the right actions within the daily performance of tasks.

All associates (individuals and legal entities) who carry out activities on behalf of Alkaloid are also obliged to follow and observe the Code.

## OUR ROLE

Our good reputation is in your hands!

No matter what you do or where you work, you are Alkaloid. Keep this in mind as you make decisions, execute each transaction, build business relations, manufacture each product, and make sure that your activities always reflect our **core values**, follow our Code, and comply with company policies and procedures, as well as the legislation of the country where you work. That is the best way to protect the reputation we build together.

Our reputation is a great investment in the future and depends on each individual who works in and with our company, in any country where Alkaloid has operations.

Our Code and our policies / procedures cannot answer every question, that is to say, they do not cover all the situations which might happen to us while we perform our tasks. It is not a substitute for our individual responsibilities, actions and decisions related to common sense.

It is our responsibility to learn and understand the legal and corporate requirements, as well as the standards associated with responsibility in our workplace.

## OUR LEADERSHIP

- » The role of our leaders in building high ethical standards
- » The importance of leaders in implementing the Code
- » First line for support and information regarding the implementation of the Code





## THE ROLE OF OUR LEADERS IN BUILDING HIGH ETHICAL STANDARDS

For us at Alkaloid, compliance with high ethical standards is one of the key responsibilities of line managers. In fact, in many cases, non-compliance with ethical standards is a consequence of poor management and / or lack of leadership.

Our goal as leaders is to strive to be in constant communication with our employees for whom we are responsible. Therefore, we carefully choose our employees, develop them, and properly guide and monitor them in terms of how they perform and fulfill their tasks.

For us at Alkaloid, not only the results are important, but also the way they are achieved.

In the process of employee evaluation, line managers are required to ensure that the results are in line with our ethical norms and principles. Therefore, our efforts lean towards providing appropriate knowledge to managers which shall enable them to meet the expectations and their goals and objectives. They are expected to adopt an attitude of compliance with the corporate ethical standards and principles in assessing the successful performance of their employees.

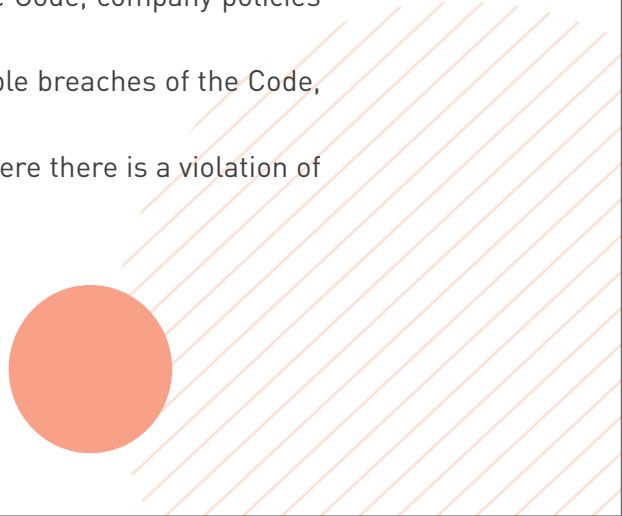
Following and adhering to these high ethical standards is one of the main roles of our managers.





## THE IMPORTANCE OF LEADERS IN THE CODE IMPLEMENTATION

If you manage people and have a special and important responsibility to set an example and act in accordance with our Code, you are expected to follow the principles below:

- » to set a personal example of integrity, not only through words but also through real actions based on high integrity and morality;
  - » to constantly work on your competence and act as a role model, demonstrating ethics in performing all your duties and tasks;
  - » to create a culture of compliance with our corporate, ethical standards and principles, whereby our employees will understand their responsibilities regarding compliance and acting in accordance with the Code;
  - » to ensure that employees are aware and properly trained regarding the Code, company policies and relevant local laws;
  - » to build trust and encourage employees to share concerns about possible breaches of the Code, without fear of any revanchism;
  - » to constantly strive for prevention, detection and resolution of cases where there is a violation of the Code and
  - » to recognize and reward the ethical behavior of our employees.
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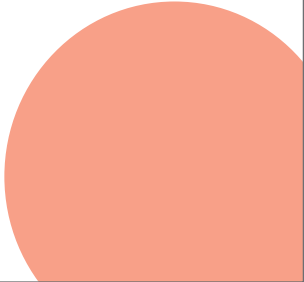


## FIRST LINE FOR SUPPORT AND INFORMATION REGARDING THE CODE IMPLEMENTATION

As line managers<sup>1</sup> and leaders, it is important that you achieve a significant level of knowledge and integrity and be the first line of information where employees can obtain relevant, comprehensive and accurate information about the Code. You are a key link in the observance and implementation of the Code. The employee should always feel safe and confident that by approaching you they will be able to share breach concerns or ask for further clarification of the guidelines set out in the Code.

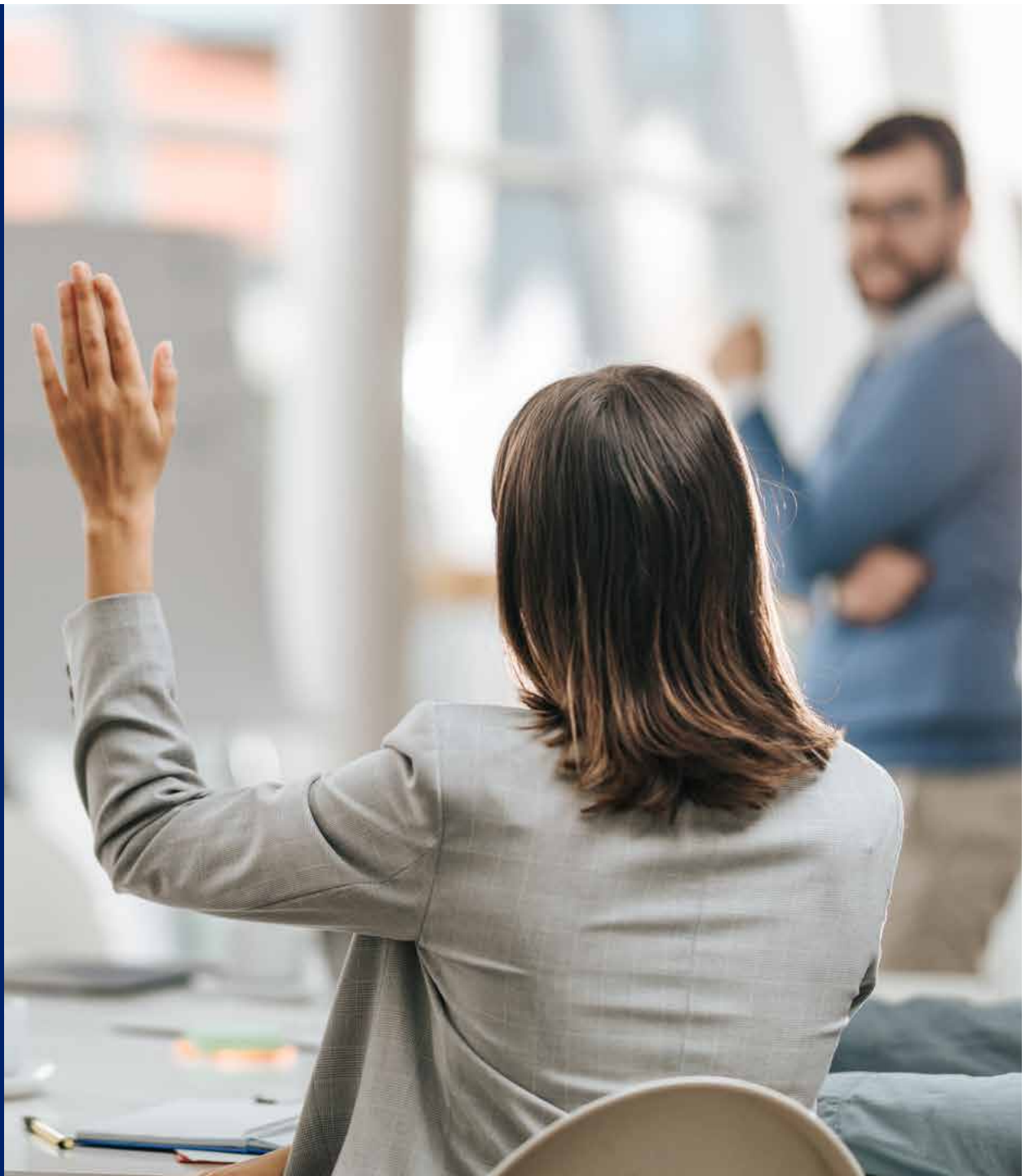
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<sup>1</sup> Throughout this Code you can find expressions that describe the level of the manager, and the explanation for them is as follows:

- „line manager“ – this term refers to the manager who is directly superior
  - „second level of management“ – this term refers to the manager who is above the line manager. Each concerns or ask for further clarification of the guidelines set out in the Code.
- 

## REPORTING UNETHICAL BEHAVIOR (CODE VIOLATION)

- » Speak up – be the voice of integrity
- » Corporate Compliance Officer





Alkaloid is committed to conducting all of its business operations with integrity and in accordance with the Code. Unethical behavior (Code violation) of any employee, including a manager at Alkaloid, will not be tolerated.

If any employee, including a manager at any level, violates the Code, company policies or local laws, he or she will be properly sanctioned by a special corporate body set up for that purpose, i.e. by the Corporate Compliance Committee. In order to address the violation, the Corporate Compliance Committee will take all actions, including corrective and preventive measures, in order to prevent similar occurrences in the future.

We are committed to dealing appropriately with any case of unethical behavior (Code violation) through the following activities:

- » call notice of incident will be treated honestly;
- » each report will be examined competently and in a timely manner;
- » the evaluation of facts and evidence will be performed objectively and independently and
- » appropriate corrective and preventive steps will be taken, which include counseling, training, disciplinary measures, or termination of employment.

Managing such cases is a major part of our Code compliance process, company policies and local laws.

It is assumed that each employee being charged has not violated the Code until the evidence gathered from the proceedings confirms a breach of the Code.

The entire procedure for determining a violation of the Code is carried out by the Corporate Compliance Committee, in accordance with the precisely established rules and principles, within which it determines an appropriate corrective action or sanction.

Any case of unethical behavior will be reported and registered in the Code violation system.

## WHAT TO EXPECT FROM US?

- » Whenever somebody notices or is aware of behavior contrary to the Code, Alkaloid policies or local law by an Alkaloid employee or manager, we encourage them to honestly report such a breach.
- » We are all expected to fully cooperate with the responsible persons running the proceeding and to provide them with all the evidences in order to verify that our actions were in accordance with the Code as well as with the company policies or local laws.



**Dilemma:** What should I do if my line manager insists on doing actions that go against Alkaloid's integrity policies?

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**Answer:** If your line manager insists on activity that is contrary to Alkaloid integrity policies, then you should report this case through one of the channels for reporting unethical behavior.



## » WHAT TO REMEMBER?

- » We should do our best to prevent cases of unethical behavior in the future.
- » We are expected to cooperate as much as possible with the persons involved in the procedure for possible violation of the Code and to ensure that we have appropriate evidences for the case.
- » The company will take appropriate corrective measures and sanctions if we are faced with inappropriate ethical behavior of our employee.

**Dilemma:** There is a conflict between what is defined in our Code and the legislation in the country where I work. I'm not sure what to do.

**Answer:** The best approach is to follow the stricter requirements, but if you still have dilemmas, seek guidance from the Legal Department / Corporate Compliance Department of Alkaloid\*.

\* First instance for addressing such dilemmas is local Legal department/local Compliance officer where applicable

## SPEAK UP – BE THE VOICE OF INTEGRITY

Being a voice of integrity is not always easy but that's how we address concerns regarding unethical behavior, we make our company stronger and protect colleagues from violation of their integrity.

We do not always have to be convinced that a breach of the Code has occurred. However, at the same time, we are all obliged to show concern when we experience a situation in which our corporate principles or integrity policies are not applied.

Anyone who shares information with good intentions is protected from unpleasant situations arising thereof. To this end, our employees have access to various ways of reporting for this purpose. If there is a concern about possible unethical behavior, it can be communicated to the line manager of the employee or to the second line of management, where applicable. If there is a report of a Code violation, it should be done with the Local Compliance Officer if so appointed, and / or a Corporate Compliance Officer, through the indicated channels of communications with them. The reporting can be anonymous, if necessary, and Alkaloid guarantees the security of the information transmitted through the company's web form [AlkaSpeakUp](#). All complaints for violation of the Code, in an appropriate procedure, are decided by the Corporate Compliance Committee of Alkaloid, whose members are appointed by the Board of Directors of Alkaloid.

Confidentiality is granted to a maximum degree, but you can also choose to remain anonymous in this procedure. In case you identify yourself, you will be of great help in properly conducting the investigation. Your identity and information will only be shared where necessary. Any kind of revanchism towards anyone who shares concerns about a violation of our ethical principles is the basis for disciplinary action, which includes termination of employment.

## WHAT TO EXPECT FROM US?

- » If there are concerns about breaches of corporate principles or integrity policies, it is best to talk to your line manager in person.
- » Should you not feel comfortable talking to your line manager, then you can communicate with the second line of management, where applicable, as well as with the Corporate Compliance Officer. Violations of the Code are reported through the indicated channels of communication with the Corporate Compliance Officer (the [AlkaSpeakUp](#) web form offers the possibility to report anonymously if necessary).



**Dilemma:** Is it beneficial for Alkaloid if I come out and speak about a possible violation of the Code?

**Answer:** Of course. Alkaloid management needs to be aware of any activity that causes breach of corporate integrity in order to be able to treat it appropriately and confidentially. By doing so, you are acting in accordance with our **core values** and company policies.

## » WHAT SHOULD WE REMEMBER?

- » Speaking out and sharing concerns about possible breaches of the Code is the right thing for every responsible employee and he deserves recognition. By sharing concerns he protects himself, his colleagues as well as the rights and interests of Alkaloid.
- » Alkaloid's line managers are expected to create a trusting environment that encourages employees to speak out and help address issues of breach of the Code.

## CORPORATE COMPLIANCE OFFICER

Alkaloid's Corporate Compliance Officer is fully committed to ensuring that our people grasp and follow the ethical principles set out in our Code. The Corporate Compliance Officer is the contact person for all employees, shareholders in the company, our business partners and clients regarding issues and actions related to our Code, as well as the person who directly receives reports of breaches of the Code. All employees of Alkaloid and subsidiaries and representative offices can contact him or her regarding all issues within the competence of the Corporate Compliance Officer of Alkaloid through:

- » Alkaloid's **AlkaSpeakUp** web form for reporting a Code violation, set on the Alkaloid's website ([www.alkaloid.com.mk](http://www.alkaloid.com.mk)), which also provides an opportunity for anonymous reporting;
- » Calling the phone number +38972918245 (telephone number of the Corporate Compliance Officer) and via
- » email to the following address: [complianceofficer@alkaloid.com.mk](mailto:complianceofficer@alkaloid.com.mk)\*

Having received a report of a breach of the Code, the Corporate Compliance Officer forwards it to the Corporate Compliance Committee, a corporate body that conducts the investigations and decides on complaints of breach of the Code. The Corporate Compliance Officer is also a member of the Corporate Compliance Committee and actively and professionally participates in the procedure for determining the occurrence of a violation and possibly a sanction for the violation.

\*Filling a report on your local language is also acceptable



In all major subsidiaries of Alkaloid, where applicable, local Corporate Compliance Officers are appointed, and where not designated, that function is performed by the Country Manager of the subsidiary. The persons responsible for local compliance are in close coordination and constant communication with the Corporate Compliance Officer of Alkaloid and have the following responsibilities:

- » provide support in the implementation of the Code of Conduct of Alkaloid;
- » represent a person for contact, assistance and advice to employees, if they suspect a violation of the Code;
- » monitor the compliance of the local company with the applicable local laws, regulations and codes in the country in which they operate;
- » are involved in providing a high level of knowledge to the local company, through various trainings, educations and control of knowledge related to the Code;
- » support line management in implementing the Code and local integrity processes;
- » participate in the exchange of experiences with the Corporate Compliance Officer, in order to continuously improve the corporate and local practices in the implementation and observance of the Code and
- » encourage employees to come out and speak up if they have concerns about compliance with the Code and local practices in the country in which they work.

## » WHAT SHOULD WE REMEMBER?

If we do not feel comfortable contacting our line manager or second line management, where applicable, for issues related to compliance with Alkaloid's Code or local policies, the local Corporate Compliance Officer or incumbent will provide help and advice on how to proceed.

Provided that we do not wish to contact the local management on issues related to compliance with the Code and local policies, we can contact the Corporate Compliance Officer of Alkaloid directly, through the indicated channels of communication with him or her, and if we want it to be anonymous, we can do so by using the web form [AlkaSpeakUp](#).

## OUR PEOPLE

- » Integrity
- » Fair treatment of all employees
- » Mobbing
- » High expectations and our role
- » Conflict of interests
- » Employment at Alkaloid





## WHAT IS IT?

Our people are our greatest asset. We constantly take care of them, in order to ensure the best possible conditions and treatment in the company thereof. We invest in the personal development of each employee and take care to improve their knowledge and skills to enable continuous personal progress and growth in Alkaloid.

## WHY IS IT IMPORTANT?

At Alkaloid, we appreciate and respect diversity in terms of knowledge, skills, experience and individual characteristics, which enrich our work environment and lead us to better decisions and solutions.

## HOW DO WE DO IT?

Our **core values**, alongside the Code, define the way we treat each other, keep our work environment safe, care about the health of our employees and also provide equal opportunities for them.

## INTEGRITY

**Personal integrity** is based on the values and principles we have. It is a mark of a person who is guided by strong moral and ethical principles in everyday action.

Each of us has a responsibility to make decisions that are based on the highest ethical and moral principles and are closely linked to our personal integrity. This benefit gives us an even greater responsibility to be careful about our actions. We expect our employees to live company's **core values** as part of their personal values.

In situations where common sense may be at stake, we remain steadfast and determined to make the right decision, as high standards of moral and ethical principles guide us every day.



**Dilemma:** I am a member of the inventory committee at the warehouses. When inspecting the items, some of them are missing, and I need to sign that they are physically there, which I cannot verify. What should I do?

**Answer:** Never hide inaccurate information that could put your reputation and the reputation of our company at risk! Point out that giving incorrect information and hiding items that cannot be physically located should not be included in the inventory report. If, however, you are prompted to sign the report with incorrect information, contact the second line of management, where applicable, or report to the Corporate Compliance Officer through the indicated communication channels.

**Corporate integrity** is the conduct of business operations in compliance with all applicable laws and regulations, as well as the high standards of integrity set by Alkaloid. Adherence to these standards is an important principle, which leads to continuous success in our actions.

All of our stakeholders expect from us to behave with integrity when conducting daily business activities. Adherence to our high standards of integrity can sometimes adversely affect our results. However, we believe that the results are not always the most important, but the manner in which they are achieved.

Each of us influences Alkaloid's integrity through our everyday actions. Alkaloid is a global company, so breach of integrity by any employee, wherever they conduct their business, can make negative impact on our reputation as a company.



**Dilemma:** My boss instructed me to do something that, in my opinion, is not in line with company integrity standards. What should I do?

**Answer:** Share your doubts with your supervisor (it takes courage, but it is the right thing to do). Remember that you are the only one who is responsible for your own behavior and actions. If the supervisor insists on not sharing the suspicion, then contact the second line of management, where applicable, the local Corporate Compliance Officer or report directly to the Corporate Compliance Officer through the indicated communication channels.

## FAIR TREATMENT OF ALL EMPLOYEES

In everyday communication, as well as in the selection of co-workers, partners, job applicants and clients, we advocate a policy of non-discrimination on all grounds, i.e. in accordance with our **core values**, we promote diversity with admiration and empathy, independently from their position at the company, origin, national / ethnic and religious affiliation, age, language, race, gender, social status, mental or physical disability, health status, sexual orientation, values or interests of that person.

Alkaloid also adheres to the principles of protection against child labor abuse, in line with international standards.

As a global company, Alkaloid, being spread in many countries, strives for respect and values the diversity of each individual. We recognize differences in people as a chance to learn something new and approach things in a different way.







**Dilemma:** In the weekly distribution of activities, my supervisor assigned tasks to all teammates except me. The same thing has been happening continuously for the past few months, even though I previously performed all the assigned tasks accurately within the stipulated time frame. What can I do?

**Answer:** Isolating individual team members in order to cause discomfort and humiliation is an unfair treatment. Talk to your supervisor about why he or she is not delegating work tasks to you or to other colleagues, and try to find out why he or she is isolating you from the team. If you are unable to resolve the conflict in a peaceful, professional and productive manner, contact the second line of management, where applicable, or report to the Corporate Compliance Officer via the indicated communication channels (the [AlkaSpeakUp](#) web form offers the opportunity for anonymous reporting if necessary).

## ➤ WHAT SHOULD WE REMEMBER?

Alkaloid implements a policy of equal opportunity and equal treatment for all, creating a working atmosphere in which each individual has the chance to show their values and thereby contribute to greater company success. Guided by these principles, we accept the different views of people as an advantage in everyday functioning.

We are aware that differences in others are an opportunity to expand our range of knowledge, skills, and worldviews. Diversity in the mindset and sharing it with those around us leads us to making more successful and constructive decisions.

## MOBBING

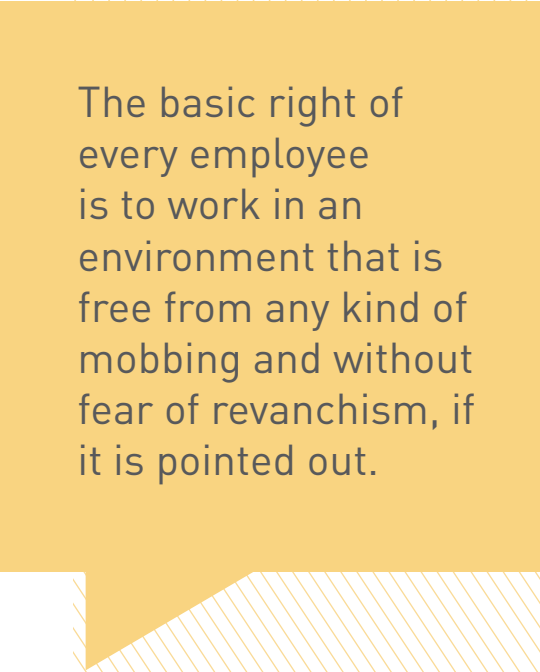
Any behavior that constitutes any form of harassment in the workplace that is intended to humiliate, ridicule or abuse an employee will be treated as mobbing. Mobbing can be recognized as both psychological and sexual harassment.

Psychological harassment is a negative behavior of an individual or a group, which violates the dignity, integrity, reputation and honor of the employee, while arousing feelings of fear in the distressed person, as well as discomfort and humiliation, where the ultimate goal may be a violation of physical and / or mental health.

Sexual harassment is any verbal, non-verbal or physical behavior, based on sexual behaviors, which ultimately violates the dignity of the person subject to sexual harassment and causes feelings of fear, discomfort and / or humiliation.

The basic right of every employee is to work in an environment that is free from any kind of mobbing and without fear of revanchism, if it is pointed out.

Alkaloid condemns any such behavior and does not allow any form of mobbing, regardless of the job and function performed by the person carrying out the mobbing.



The basic right of every employee is to work in an environment that is free from any kind of mobbing and without fear of revanchism, if it is pointed out.

## HOW DO WE DO IT?

- » We do not ridicule, humiliate or insult our colleagues.
- » We do not slander our colleagues in order to damage their reputation and dignity.
- » We do not ally with other colleagues in order to harass individuals or groups of colleagues.
- » We are not physically or verbally aggressive towards others.
- » We do not make distasteful comments, jokes, remarks; we do not share inappropriate images or texts or act inappropriately in the context of sexual harassment.
- » We do not ask for, insist on or blackmail an employee to perform sexual acts.
- » We do not use financial and / or in-kind support in our operations and actions.
- » We do not share key information with those we work and / or collaborate with, which is necessary for the fulfillment of tasks, in order to intentionally indicate an error.
- » We do not deliberately delegate tasks to teammates in order to isolate individual team members if we are in a role of a superior.
- » Alkaloid does not support the assignment of inappropriate tasks in relation to the qualifications acquired, in order to isolate certain members of the team, if we are in the role of a superior.

## WHAT IS EXPECTED FROM US?

If we witness or we are part of a situation involving mobbing, we are obliged to contact our line manager, the second line of management, where applicable, or report to the Corporate Compliance Officer, through the indicated communication channels. [AlkaSpeakUp](#) web form offers the possibility of anonymous registration if necessary).

We must not carry out mobbing or abuse our colleagues. We are expected to treat all our associates with dignity and responsibility.

## HIGH EXPECTATIONS AND OUR ROLE

Setting high expectations for our employees increases the chances that they will be successful in achieving their personal goals, which will enable them to constantly progress and develop. Our employees work with dedication and strive to go the **extra mile** in their performance and in achieving their goals. On the other hand, employees who achieve their goals increase the success of the entire company. The success of the company is a mirror of the commitment and dedication of each of us.

Our employees show a **positive attitude towards work** and fulfill their tasks with honesty and integrity. They represent our company responsibly and behave professionally even when they are not on duty. They follow established policies and procedures when dealing with problems or complex tasks.

We share the mission and vision of Alkaloid with each employee, paying attention in particular to the special role and importance that each employee has in our company, as well as our expectations from the specific job, which helps and contributes to our mission becoming a reality.

Our employees want to be **challenged to improve**. They gain trust, respect and responsibility for making decisions within their line of duties. Also, each of our employees understands the **importance of their role** and how their responsibilities affect our organization or the department where they work.

We communicate clearly with each new employee about exactly what our expectations are and we constantly repeat them as we guide and involve them in their new job and responsibilities.

We expect our leaders to share **clear expectations** and to constantly communicate with our employees. Everything should start with them. They help our employees understand **the big picture** thereby enabling us to better understand why our role is important and to dedicate ourselves more easily to our tasks.

## CONFLICT OF INTERESTS

**Conflict of interests** is any situation in which there is a conflict of personal with company interests and goals and is related to our professional powers and duties. Also, a conflict of interest is any situation in which the interests and goals of our close family member or our friends are intertwined with the interests of Alkaloid.

Conflict of interest occurs when we receive direct or future personal gain which may be affected by our decisions or actions.

Alkaloid supports and gives freedom of investment and personal involvement in social life and business relations with the surroundings, but in no case should we have personal gain that has a conflict of interest with Alkaloid.

### » WHAT SHOULD WE REMEMBER?

- » To avoid situations in which our personal interests conflict with the interests of the company.
- » Not to use our position in Alkaloid for our personal benefit or for the benefit of our relatives or close associates.
- » To always inform our line manager of any potential or current conflict of interests. It is important to be able to recognize potential conflict that can help us avoid it.
- » To inform our line manager, second line management, where applicable, or report to the Corporate Compliance Officer, through the indicated communication channels, if we are aware of a conflict of interests in our work environment. Failure to notify of a potential conflict of interest is a violation of our Code.
- » If we suspect a conflict of interests related to our line manager, we are obliged to contact the second line of management, where applicable, or to report to the Corporate Compliance Officer, through the indicated channels of communication thereof.



**Dilemma:** As the manager of a smaller team of employees, I have been allocated a budget to promote one employee from my team for next year. The son of my neighbors, who is in a difficult financial situation, also works in my team, and I know that this salary increase would be in his favor, even though he is not successful in carrying out his activities. On the other hand, his teammate has shown excellent results in performing his tasks in the past period. I am in a dilemma whom to give the promotion to.

**Answer:** The promotion is given to the employees in order to reward them for their past work, and give them motivation for future success. The decision to help others is always a good one. But, in this case, the promotion should be given to the employee whose results give the greatest contribution to the work process.

## WHAT IS EXPECTED FROM US?

We are obligated to avoid any situation or personal interest that could affect our professionalism and independence in making decisions while carrying out our duties. Before taking any action or if there is a dilemma regarding a potential conflict of interest, it is our responsibility to notify and consult our line manager or second line management, where applicable, or our Corporate Compliance Department.





## EMPLOYMENT AT ALKALOID

Alkaloid nurtures a stimulating environment, in which real professionals work and contribute.

We value your skills and look for ways they can be used in the company. We guarantee that you will have access to the training and coaching you need to excel in your work and to help you reach your potential.

We guarantee our potential employees a mentorship from experienced and proven professionals, who will encourage them to feel appreciated and valued on a daily basis.

Alkaloid strives to ensure a continuous improvement of the working environment. We provide an equal opportunity for everyone to be able to advance and develop, in order to reach their potential and contribute to the success of the company, but also in the commitment to help others.

As for the ways you can apply for employment, scholarships or internship, you can see more on our website [www.alkaloid.com.mk](http://www.alkaloid.com.mk) in the career section\*.

\*All information on corporate web site are not applicable for all affiliate employees. Affiliate employees should also refer to their local web sites for this type of information



## OUR BUSINESS ACTIVITIES / STAKEHOLDERS / EXTERNAL COMPLIANCE

- » Gifts and entertainment
- » Preventing corruption, bribe and money laundering
- » Financial reporting, accounting and taxes
- » Stock trading and internal information
- » Personal data protection
- » Social responsibility
- » Our community
- » Environmental protection
- » Respect our business partners and competition
- » Communication with government officials
- » Public procurement / tenders





## WHAT DOES IT MEAN?

Alkaloid, along with its subsidiaries, has the privilege of conducting business in several countries. In each of the countries where we carry out our activities, we are obliged to know and abide by the laws and legislation that regulate our operations.

## WHY IS IT SIGNIFICANT?

Our compliance with laws and local regulations demonstrates our commitment to ethical and transparent operations in the communities where we conduct our activities. Also, any non-compliance with the legislation may result in individual and collective (company) punishments, penalties, bans and other personal or commercial disciplinary measures.

## HOW DO WE DO IT?

Alkaloid, within its integrated management system, applies a number of corporate policies, procedures, regulations, which along the regular trainings and workshops help employees to comply with legal requirements. The Legal Department / Corporate Compliance Department, Quality Assurance Department, Human Resources Department, Finance Department and Internal Audit Department provide guidance and are open to all issues related to compliance with the laws relating to our operations.

Regarding any non-compliance between the local legislation and the Code, we are obliged to immediately inform the Legal Department / Corporate Compliance Department / Human Resources Department and /or the Internal Audit Department\*.

\*First instance for addressing such dilemmas are local above mentioned departments where applicable

## GIFTS AND ENTERTAINMENT

As a company, we operate in many various environments and surroundings, where certain activities (occasional gift or entertainment offer) are an expression of courtesy or a reflection of social and cultural practices. We respect cultural norms to an appropriate degree, in accordance with the local laws and regulations under which we operate, but those activities must not violate our ethical values.

An occasional gift or entertainment offer is often considered a normal part of the business, but sometimes even a well-meaning gift or offer may be inappropriate. Any gift or entertainment offer that creates a sense of obligation or that jeopardizes your professional judgment is inappropriate.

We must not give or accept gifts and services that could endanger our personal integrity or the integrity and independence of Alkaloid.

Gifts or services given or received should:

- » be nominal in value, be rare and have a reasonable business purpose
- » be in accordance with accepted business practices for the industry and the geographical location and should not be considered lavish;
- » be permitted by law and by the policies of the giver and the receiver;
- » not damage the reputation and integrity of our company;
- » be accurately recorded in our books and records and
- » not involve cash or funds (gift card, check, loan or securities).

It is forbidden to ask for gifts or services of any kind. This includes not only cases but also all types of compensation. In case we receive an offer, we don't oblige. We must not use discounts or other additional benefits from suppliers and our business partners unless they are available to the general public or to our Alkaloid colleagues.

We do not accept offers that may affect our business decisions or that may seem inappropriate, even if they are within the values that may be acceptable to the company. We are required to report these situations to the Corporate Compliance Officer.

In case we have any doubts or hesitations about accepting or rejecting the offer, we need to try to immediately present the situation to our line manager or the Legal Department / Corporate Compliance Department\* and ask for instructions on how to proceed.



**Dilemma:** I received a gift from a business partner that I know I must not accept. What should I do?

**Answer:** Return the gift to the business partner and politely explain our policy.

Here are some things to consider if your business partner offers a gift



Is the gift modest or ordinary and why do I get it?



Is the gift more valuable than the face value?



Does the seller give presents regularly and how will the acceptance affect the surroundings?



Does the gift cause a sense of obligation or compromises my professional judgment?

\*First instance for addressing such dilemmas are local above mentioned departments where applicable

## PREVENTION OF CORRUPTION, BRIBERY AND MONEY LAUNDERING

Alkaloid reflects its integrity and the principles of fair conduct in business relations through the efforts to eliminate corruption in all its forms. We are obliged to comply with all provisions and other applicable regulations of the Republic of North Macedonia and / or the countries where Alkaloid is present, which refer to bribery, corruption and / or the types of business activities with certain individuals and legal entities. In that sense, we are obliged to know the aspects of the regulation<sup>2</sup> that is applicable and falls within the scope of our tasks and responsibilities, which could be qualified as corrupt.

Alkaloid employees and line managers must not pay in-kind assets or make any transfers of value or other benefits to the representatives of business partners or public servants in order to secure or maintain a business relationship or a beneficial position, as well as to give a present to a public government officials with a value higher than the one prescribed in the applicable legislation.

<sup>2</sup>anti-corruption regulations, drugs and medical devices regulations, health care regulations, the Criminal Code and extraterritorial laws, such as the FCPA and the UK Bribery Act, when applicable.







It is our duty to immediately report to the Corporate Compliance Officer any attempt of bribery by a third party.

Alkaloid regularly provides training to its employees on the implementation of anti-corruption regulations.

Employees of international operations must know how to work completely in accordance with international anti-corruption laws.

Alkaloid operates in accordance with the law and fully complies with it to prevent money laundering and terrorist financing, wherever it conducts business activities.

We are obliged to obtain the necessary documentation from potential buyers, agents and business partners, which will confirm that they are involved in legitimate business activities and that their funds come from legitimate sources. In any cooperation with a new business partner, we are obliged to consult the Legal Department / Corporate Compliance Department\*.

We need to take into consideration that perception is important and that in certain situations our behavior could be considered bribery or inappropriate, regardless of our intent.

**Remember:** It's simple, bribing of anyone, in any organization (public or private), at any level is always wrong and not allowed. Bribery / bribing does not only refer to cash, but to everything that includes value (gifts, services, job offer, loan, entertainment, travel, etc.)

\*First instance for addressing such dilemmas are local above mentioned departments where applicable

## FINANCIAL REPORTING, ACCOUNTING AND TAXES

Alkaloid is a company listed on the Macedonian Stock Exchange, which carries out its activities in several countries. In all our activities and transactions, we must keep our books and records accurate in order to ensure the integrity of our financial statements. It is our responsibility (to all employees) to create/ report fair and objective financial and non-financial data. Accurate business records are essential for managing the company and maintaining and safeguarding shareholders trust. They also help Alkaloid meet its obligation to provide complete, accurate and timely financial reports to the public.

We fully comply with International Financial Reporting Standards, as well as tax laws and regulations in the countries where we operate. In case you come across a new and unfamiliar transaction, for which you are not sure what tax / accounting effect it may cause, seek advice immediately from the Finance / Tax Department of Alkaloid AD Skopje.





## WHAT IS EXPECTED FROM US?

- » To be sure that every financial and non-financial information that we create and report is true, objective and complete. We must not make false or misleading reports. Falsifying reports, records and accounts or misrepresenting facts is fraud.
- » Respect the internal controls defined in the policies and company procedures.



**Dilemma:** I do not work in the Finance / Accounting Department. Am I responsible for the integrity of the financial information?

**Answer:** Yes, almost all transactions, i.e. activities that we make every day, have a financial effect. Accuracy in recordkeeping documents is not the job of just one team or one department within the company - it is responsibility of all employees. All of our daily transactions, i.e. activities, must be recorded in a timely, accurate, complete and appropriate manner (example: travel expenses reports, contracts, sales invoices, planned expenses, sales reports, production orders, etc.).



**Dilemma:** Lately I have had several business trips, but I have lost some of my hotel bills. A colleague who was in a similar situation gave me advice to prepare fictitious bills and submit them. Is that okay?

**Answer:** No, this is a forgery of the travel expense report and is not acceptable. You should inform your supervisor and the Finance / Accounting Department about the situation and together seek an appropriate solution.

## STOCK TRADING AND INTERNAL INFORMATION

**Internal information** is any price sensitive information that is not made public through print or electronic media.

**Price sensitive information** is information of a specific nature, which is directly or indirectly related to the issuer of securities and which, if disclosed, could affect the price of the issuer of securities or influence investors' decision to buy, sell or hold securities. The most common examples of price sensitive information are: sales data, operating profits, plans, changes in the company's management structures, capital investments, license agreements, regulatory activities, lawsuits, potential capital acquisitions / mergers, dividend distribution decision, changes in the company stocks owned by the Management Board and the Supervisory Board members and other.

As employees of Alkaloid, while performing our duties, we may obtain information about our company or about the companies we cooperate with, which is not publicly disclosed and which meets the definition of internal information. This knowledge makes us owners of internal information, so that, in accordance with the legislation, it's forbidden to make material gains from trading in securities based on the internal information, disclose them or share them with third parties (including family and friends).

Internal information should be kept in accordance with the company's confidentiality policy.

If you are not sure whether the information received is price sensitive or internal, seek advice from the Finance Department, the Legal Department or the Department on shareholding and property issues.

## PERSONAL DATA PROTECTION



**Personal data** is all information that can be used for the purpose of direct or indirect identification of a certain physical entity, such as name, surname, social security number (pin of entity), telephone number, address, e-mail address, date of birth, photos, etc.

Alkaloid operates in several countries and uses various systems for processing, exchanging and sharing data with its capital affiliates and external partners. The growing need for everyday cooperation, as well as the use of modern electronic tools and communication platforms, contributes to the increased exchange of personal data.

There are laws on personal data protection that regulate how to collect, store, use, share, transmit and destroy personal data responsibly. We are obliged to know and respect those laws wherever we carry out our activities (in all countries where we have operational activities, as well as in direct cooperation with individuals from any part of the world).

Take care of cyber security, make sure you follow the procedures and processes we have established as a company, in order to protect against attacks and unauthorized access to our computers, networks, software programs and databases.

## WHAT IS EXPECTED FROM US?

- » To know what information can be treated as personal data.
- » To abide by the laws on personal data protection in the country / countries where we work.
- » Not to request access to any personal data unless it is related to our work.
- » To treat personal data with the utmost seriousness, in accordance with the purpose for which they are provided, and to take care of their confidentiality in accordance with the applicable legislation.
- » To provide technical and organizational measures for protection of personal data of our employees and business partners; to provide the necessary consents and agreements with the entities with which we exchange personal data, in accordance with the applicable legislation.



**Dilemma:** With the purpose of better presenting their product, one of our suppliers would like to send a brochure and a free sample of the product to the colleagues from my service / department. To that end, he asked me for a list of names and addresses of my colleagues. Is it okay to share this information with him?

**Answer:** If you are not sure, it is best to contact the Legal Department or the officer (authorized person for personal data protection). Although this request is well-intended and your colleagues may agree to receive free samples, revealing such information undermines our commitment to the confidential storage of personal data\*.

\*First instance for addressing such issues are local above mentioned departments where applicable

# SOCIAL RESPONSIBILITY

## OUR COMMUNITY

In our relationship with our community, we believe that simply being a good neighbor is not enough. We wish to be a good partner; we want to improve the communities we work in, since we are part of them. Through **student** support (Internship Program and regular scholarships for the best students from the Trajche Mukaetov Foundation); by supporting **sports** (Macedonian national team in handball, volleyball, basketball, chess) and **culture** (providing best conditions for the creative work of prominent artists); by organizing regular **charity events** (under the auspices of the Trajche Mukaetov Foundation, in order to help the most vulnerable categories in our community); through continuous support of the **health care systems** where we operate and through a large number of other activities, we strive to give back to our community the best we can and in accordance with Alkaloid's social responsibility policy.

Since bringing back to our community is part of Alkaloid's **core values**, we encourage you to get involved / learn more about our corporate social responsibility initiatives, and give your input to improve existing or initiate brand new ways of bringing back to our community.

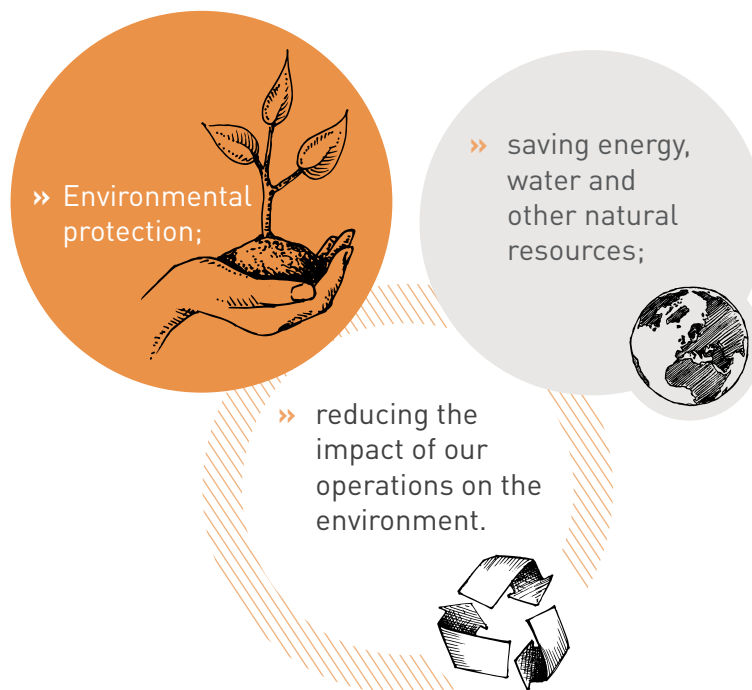
## ENVIRONMENTAL PROTECTION

Alkaloid AD, as a socially responsible company, regards the environmental protection as a long-lasting and continuous commitment. The environmental protection and management systems are part of the Integrated Quality Management System (ISO 14001:2015).

We strive to carry out our activities in an environmentally responsible manner and we are committed to comply with all applicable environmental laws and regulations. We have set ambitious goals to minimize environmental pollution, by reducing emissions of gases and wastewater, selecting waste, reducing fuel consumption and more. In addition, through the Energy Management Department, we are developing strategies to increase energy efficiency and save energy in line with energy management policy.

## WHAT IS EXPECTED FROM US?

To abide by all laws, policies, permits and regulations aimed in relation with:



# RESPECT OUR BUSINESS PARTNERS AND COMPETITION

We cooperate with business partners from all over the world and they play an important role in our development and in achieving our success. Therefore, we must ensure that the relationships we build with our business partners rely on mutual respect and trust. Choose the right partners for our business associates by making objective decisions, based on parameters such as quality, service, price, availability and reliability. Make sure they operate ethically, in accordance with the law, and in a way that does not compromise our policies and values.

In order to start communication with business partners (suppliers of raw materials, materials, marketing agencies, distribution companies, buyers, etc.), it is necessary to notify the supervisor and get approval for contact. When communicating with external associates, the good practices described in this Code should be followed. The information exchanged must be accurate, clear, precise and not confidential. In case of required exchange of confidential information, it is necessary to obtain approval from the direct superior and / or by signing a confidential disclosure agreement.

## COMPETITION

Alkaloid stands for fair competition, and by "fair competition" we mean gaining customers, i.e. achieving market results through a competition of ideas, innovations and high-quality products. Competition can be challenging for us, and it motivates us to pursue our goals.

We outperform our competition in a fair and honest way.

## ➤ WHAT TO REMEMBER?

The reputation and integrity of Alkaloid can be significantly affected by the choice of our business partners.

No matter where and who we work with, our approach to business partners remains the same (consistent), fair and transparent.



## COMMUNICATION WITH STATE BODIES AND REPRESENTATIVES

Each of our contacts with a representative of the Government officials, of government institutions and state bodies, with state companies (public enterprises), as well as with the non-governmental sector, should take place with the prior approval or authorization of the superior. We should be trained in advance to properly communicate with the above institutions and bodies. This refers to any type of communication, i.e. formal or informal, written, electronic or verbal. If they contact us directly from any of the listed institutions, and we are not authorized to communicate with them, we are obliged to forward the contact to the Legal Department / Corporate Compliance Department or to the Marketing Communications Department.

Part of the government institutions' job as well as of the government agencies / agencies is to strictly monitor companies' compliance with legal and regulatory provisions. We fully cooperate and support inspections to verify compliance with applicable requirements.

### WHAT IS EXPECTED FROM US?

- » Communication (through prior approval / authorization) with government officials in a transparent, proactive and accountable manner.
- » Respect for our **core values**, related to integrity and honesty in interacting with government officials.

## PUBLIC PROCUREMENT / TENDERS

Public / state institutions and companies are one of our key customers, i.e. stakeholders. In each country they are subject to special local laws, which regulate how the necessary products and services are supplied. As a supplier of these products, we are also expected to comply with laws and other regulations governing the field of public procurement.

Our employees involved in public procurement, tenders or our business associates who offer our products at these tenders must understand and follow the principles and rules of public procurement, defined in the legislation. These rules may be complex, but they are essential to the legal compliance of our operations. The Legal Department can provide guidance and professional assistance for these activities.



# INTERNAL COMPLIANCE

- » Let's protect our assets, confidential information and intellectual property
  - » Dress code
  - » Safety and protection at work
- » Electronic data management and cyber security
- » Social media
- » Communication with the media and stakeholders
- » Internal communication





## WHAT IS IT?

Alkaloid manages internal compliance risks through mechanisms defined within Alkaloid's integrated management system and through corporate policies, procedures, standard operating procedures and operating instructions.

## WHY IS IT IMPORTANT?

Internal mechanisms of control, applied within the corporate policies, procedures, standard operating procedures and operating instructions, contribute to minimizing the risk of irregularities in daily operations and from compromising the health and safety of employees. They also contribute to the timely detection and correction of any deviation from regular operation, thereby achieving prevention of major disruptions in the system.

## HOW DO WE DO IT?

As an integral part of the integrated management system of Alkaloid, we responsibly and constantly fully respect corporate policies, procedures, standard operating procedures and operating instructions, thus contributing to building a safe and efficient work environment.

The established integrated management system of Alkaloid manifests the commitment and dedication of the top management to improvements in terms of the quality of the system and the products, environment and work environment.

Together we participate in defining new and improving current control mechanisms, in response to the growing need for occupational risk management.

## PROTECTING OUR ASSETS, CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

Our assets include everything our company owns or uses to run its business operations. Each of us is entrusted with the care of these assets. Therefore, be proactive in protecting against loss, damage, theft and misuse. We rely on the support of our assets in our daily operations and they are of great importance for the normal functioning of the company.

**Assets and electronic devices**, such as vehicles, furniture, equipment, machinery, tools, supplies, computer hardware and software, and others are provided in order to carry out our work. Occasional personal use of items such as telephones, computers, e-mail and the Internet is allowed, but we need to make sure that we fully comply with the procedures and policies for using these items defined by our Information Technology and Telecommunications Department.

We need to be aware that **information** is also a key tool. Confidential information and intellectual property are the result of significant investments in the company and years of hard work.

Professional secrets, patents, copyrights, strategic, marketing and business plans, development of new

products, trademarks, financial statements, databases, employee files, customer lists are only part of the confidential information we need to treat with utmost concern, as by protecting them we provide a competitive advantage to our company.

In addition to our own, we respect the confidential information of third parties. If we share confidential information with a third party, any exchange of such information is subject to the signing of a Confidentiality Agreement. We must be aware that in a competitive environment third parties tend to gain access to confidential information related to our business. We must be extremely careful how we handle our confidential information in public places (airplanes, buses, bars and restaurants). Confidentiality obligations, which are part of every employment contract, are defined in detail in the Trade secret protection Rulebook and in Alkaloid's Know-how.



## WHAT IS EXPECTED FROM US?

- » Adhere to Alkaloid's Trade secret protection Rulebook and Know-how and other procedures that define the use of our assets.
- » Take care of the items and equipment and report if they are damaged, unsafe or if they need to be repaired.
- » To protect the confidential information of Alkaloid, even if we no longer work at Alkaloid.
- » To report improper use of our assets and any suspicion of intellectual property theft or unauthorized disclosure of / access to confidential information about our company to the line manager or to the Legal Department.
- » When taking out the items from the workplace, we should always keep a close eye on them, i.e. carry them with us and not leave them unattended in public places (e.g. in a car).



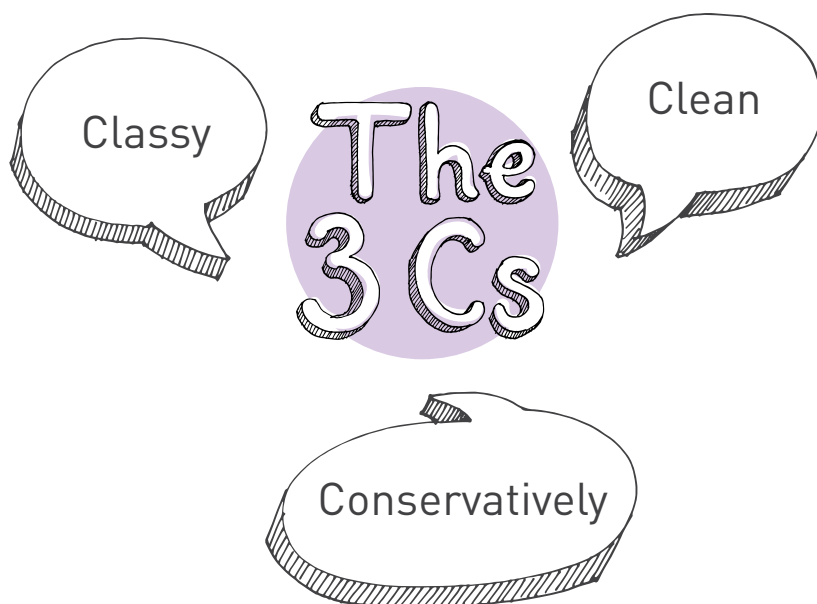
**Dilemma:** My cousin has recently started working for another company in the same industry. She is interested in talking to me about the differences and similarities between Alkaloid and her new employer. Am I allowed to say anything and to what extent?

**Answer:** You need to be very careful what you say, even if you talk to a close family member. Ask yourself if the information you share is available to the general public. If not, you should not share confidential information with your cousin, as she is an unauthorized person.

## DRESS CODE

The dress code in Alkaloid has the purpose of setting a professional and rational framework for business attire in the workplace for all employees

Wherever uniform is not common, clothing should be business-oriented and non-intrusive, taking into consideration the following recommendations:



- » to maintain professionalism in choosing clothes;
- » always present a positive image based on the clothes;
- » clothes should be in accordance with the three basic characteristics of business clothing (The 3 Cs): classy, clean and conservative (with good taste and appropriate for the occasion)

It is generally recommended to follow the rules for business casual clothing. Clothes should be comfortable and appropriate for the occasion to ensure a decent and professional look.

This style includes:

- » coats and trousers;
- » shirts, blouses, polo shirts;
- » skirts, dresses;
- » sweaters;
- » shoes and boots.

Pieces of clothing should not be:

- » too short, too tight or too loose;
- » see-through;
- » with inappropriate prints and accessories and
- » fringed, torn.



Our shoes should be clean, without open toes and heels and without inappropriately high heels. As for the boots, they should not exceed the height above the knee. The style does not have to be strictly formal, but it should not include a sports clothing and an evening attire.

On Fridays it is allowed to wear jeans with a classic cut, without openings and / or fringes. Our clothes should always be clean, tidy and ironed and the underwear lines should be disguised.

For formal meetings (internal and external) it is mandatory to practice formal business style. It includes a suit (paired with pants or skirts for women), a shirt, and a tie for men, socks, shoes and a belt. Recommended colors for this style of clothing are black, navy blue, brown, gray, and light shades for shirts.

When invited to an event, celebration or cocktail party, or when assigned the role of a representative of our superior, we need to pay attention to the dress code, which is usually indicated on the invitation of the event.



On all occasions, it is especially important to pay attention to personal hygiene, with particular attention to oral hygiene and the cleanliness of shoes and clothes. It is also important not to overdo it with strong perfumes and colognes. It is recommended that make-up and manicure be discreet, without flashy and too striking colors and patterns. Our hair should be clean, cut and tidy. The jewelry and accessories should be as few as possible, non-striking and in accordance with your position and role at Alkaloid.

## OCCUPATIONAL HEALTH AND SAFETY

„Alkaloid respects the safety of all employees because they are our greatest asset. By systematically identifying risks and hazards, we are dedicated to providing safe and healthy work environment for employees, temporary staff, interns, business partners, visitors and associates who work in our facilities or on the premises.

All operational and strategic measures pertaining to occupational health and safety are in line with the positive legal regulations and world standards with the purpose of providing safe, secure, and healthy work environment. The occupational health and safety policy as part of the integrated management-system policy of Alkaloid is implemented systematically along with all the necessary technical, organizational, and personal measures.

## WHAT IS EXPECTED FROM US?

We are bound to ensure the welfare of ourselves as well as others. This is achieved by following and complying with the occupational health and safety procedures and guidelines of Alkaloid and by cultivating a day-to-day culture of safety. Each member of staff has the authority to take urgent measures to protect people, regardless of their position or responsibility. We urge you to remain vigilant and aware of your surroundings. Should you notice a certain situation that might endanger others, take proper measures and immediately inform your supervisor as well as the General Affairs / Occupational Health and Safety Office. Make sure that you work carefully at any time and place, observing the safety procedures in order to protect yourselves and your co-workers from injuries.

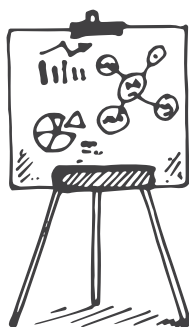
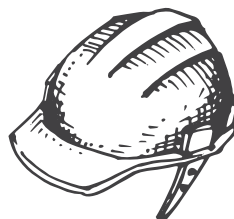
Possession, use and distribution of alcohol, illicit drugs and narcotics is strictly forbidden, as substance abuse may impair your judgment, your performance, and the safety of those working with you.

## PROMOTE SAFETY



**Follow** the requirements for safety procedures and instructions

**Use** the safety equipment!



**Make sure to attend** trainings, workshops, exercises on this matter!

**Report immediately** the unsafe situation!



**Dilemma:** My team is late with the completion of the project, and our company expects us to meet the deadline. We found ways to achieve the goal by skipping several safety procedures. As long as we are careful, is it okay to speed up the process to meet the project goals?

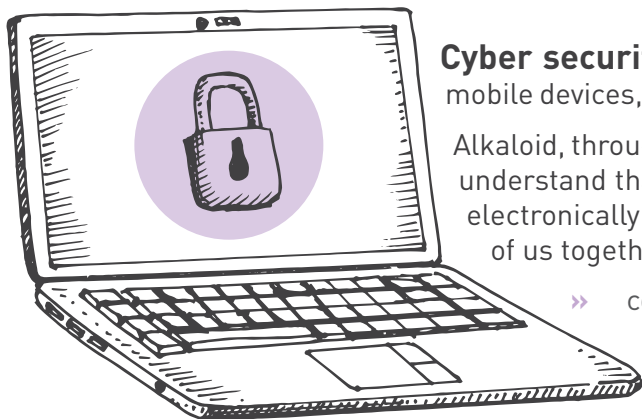
**Answer:** Occupational health and safety procedures and policies have been put in place to keep you safe and to protect the integrity of our products and the health of those who use them. Skipping safety procedures is not allowed. Talk to your superior and prepare a plan to achieve the goal safely and in accordance with the procedures and policies of our company.

# ELECTRONIC DATA MANAGEMENT AND CYBER SECURITY

**Electronic data** is data created in electronic form, suitable for electronic processing and transmission through electronic communication systems.

**Electronic data management** involves the creation, safe storage and deletion of data. Efficient and proper management of electronic data is key to protecting the security and interests of Alkaloid.

We are expected to think twice before creating an electronic record / data and decide if it is necessary to create one at all (e.g. email). Always use facts, not assumptions, and avoid erroneous and indicative texts. We should never create a document for which we would not be prepared to take responsibility and determine, i.e. be careful who will have access to the electronic record / data.



**Cyber security** is an established system / practice of defending computers, servers, mobile devices, electronic systems, networks and electronic data from malicious attacks.

Alkaloid, through its policies, has established an electronic security system, but we must understand that we are all part of that system and the responsibility of maintaining an electronically safe operational environment (reduction of our vulnerability) lies with all of us together. Therefore we:

» comply with all policies, procedures and guidelines relating to our cyber

security, as defined by the Information Technology and Telecommunications Department;

- » immediately send information to the line manager and to the Information Technology and Telecommunications Department if it has occurred or if there is a breach of our cyber security (possible loss or theft of data, computers, equipment, misuse or improperly regulated access to electronic data, etc.);
- » provide physical security for the electronic communication devices (hardware) assigned to us for use and do not leave them in our cars while we are out of them. We protect our password (s);
- » do not install unauthorized software, applications, and hardware or storage devices on our computer and do not access the Alkaloid network through unauthorized applications or devices;
- » do not use unlicensed software and do not make copies of our licensed software solutions (to use at home or by somebody else) and
- » are always wary of fraud or other attempts to disclose sensitive personal information or confidential corporate information. We do not open suspicious links in emails, even if we know the source.

**Dilemma:** When I go on vacation, I want to switch off completely.



Is it okay to leave my laptop to my assistant to manage approvals / authorizations in the various systems / software of the company on my behalf? I trust this person completely, so I do not mind sharing my password.

**Answer:** No. Employees should never disclose a personal password to anyone. Some systems allow you to delegate certain activities to others. Other systems transfer your authorizations to your supervisor in your absence. By circumventing these controls, you are undermining the security of our systems, evading your responsibilities, and putting your assistant in a position to violate company's policy.

## SOCIAL MEDIA

**Social media** include all digital communication channels, which allow its users to create and share content, as well as post comments underneath.

In accordance with our policies and procedures for managing websites, mobile applications and social media profiles, the only entity in charge of conducting communication through social media is the Marketing Communications Department.

Alkaloid respects the right of every employee to own social media profiles for private use, but we are expected to use them responsibly, in accordance with our **core values**. The private use of social media at the workplace is not allowed and it is recommended not to use official e-mail addresses upon sign up.

We can share the content and the brands of the company published on Alkaloid's official social media profiles, but if we receive comments and questions from third parties, we should not respond directly, but refer them to make an official contact through the "Contact us" form on Alkaloid's website or by sending a message to the official profiles of the brands whose content is shared.



## WHEN USING SOCIAL MEDIA WE ARE EXPECTED:

- » not to share confidential and other information about the operations (in posts, comments, groups, etc.);
- » not to publish any content related to our company's products, nor initiate discussions thereof, unless authorized to do so by the Marketing - Communications Department;
- » not to get directly involved in an ongoing discussion about any of Alkaloid's products or brands or about the company itself and if we believe that the shared information may be relevant to the company, we should immediately notify the Marketing - Communications Department;
- » not to publish or comment on content related to competing products, brands and companies. Our opinion can be considered biased and subjective, and it can also be equated with the views of the company itself;
- » not to publish photos taken at the workplace, i.e. at the sites of Alkaloid, as well as photos taken during business trips, except with prior approval and guidance from the Marketing - Communications Department;
- » not to express personal views, nor offensive comments aimed at political figures and any other person holding public office, i.e. who are part of the leadership of state institutions, non-governmental organizations, embassies, foreign missions, etc. and
- » not to publish, comment or share content (written and / or visual) that is directly aimed at our colleagues and collaborators. This refers to the expression of personal views and opinions with a negative context or provocation, as well as the publication of offensive and discriminatory statements / comments or photos / videos, directed at our colleagues and associates.

**Remember:** The personal behavior of each of us can have an impact on how others see our company as a whole, that is, it can directly affect our company's reputation.

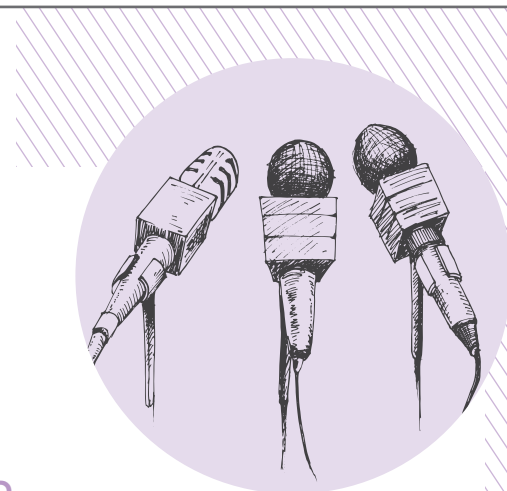


## COMMUNICATION WITH MEDIA AND STAKEHOLDERS

In order to understand the need of sending a clear message to our stakeholders, we must consider the power of words, the ways in which words can be used, and the impact they can have on our company's reputation and trust. Therefore, in accordance with the communication procedure, our company has authorized persons to communicate with the media, which includes: daily communication with the media for current campaigns, forwarding announcements / information to the media and organizing press conferences inside or outside the company premises.

Every employee, authorized to communicate and forward information outside the company, must provide clear, accurate, consistent and latest information, in accordance with the policies, confidentiality, goals and needs of our company, as well as legal and other requirements we are obliged to follow.

When an employee, appointed by the Chief Executive Officer, is invited on behalf of Alkaloid to attend an event organized by a media, he / she is obliged to act in accordance with the policy and **core values** of the company.



### WHAT IS EXPECTED FROM US?

- » Respect Alkaloid's corporate communications procedure.
- » If we receive a question, request for an interview or other type of request from a certain medium, we should refer it to the Marketing - Communications Department.
- » In case of a personal invitation for appearance in the media, due to a personal and private activity or due to membership in an organization, party or association, it is necessary to inform the superior about the topic of the conversation and via them ask for permission thereof the head of the Marketing - Communications Department.

**Remember:** We must not make any public statements on behalf of Alkaloid unless authorized to do so.

# INTERNAL COMMUNICATION

**Internal communication** is the transfer of information within our company. It is communication, i.e. sharing of information, knowledge, ideas and beliefs between employees within the company. It takes place at all levels and organizational units and includes telephone conversations and emails in the company, personal and group meetings, reports, requests, minutes, presentations, procedures, policies, trainings, intranet, notifications, corporate magazine and more.

Internal communication can be formal or informal. It depends on the people we communicate with. We use informal or less formal language with colleagues for daily interaction, but communication with company management is always formal.

In order to achieve effective internal communication, we are obliged to adhere to the guidelines in our communication policies, as well as to the **core values** of our company. To begin with, we need to have a clear reason for communication, as well as a full understanding of the needs of the colleagues we are addressing.

We use empathy and active listening to understand the other person's perspective, whether we agree with them or not, thus ensuring correct two-way communication.

Internal communication should always be with integrity, honesty and transparency, thus ensuring trust, which is the basis for good communication. We should use standard (no use of slang) language, as well as be precise and specific in conveying information.

Our obligation is to regularly, through daily activities, trainings and workshops, develop and maintain our own communication skills at a high level, thus contributing to building fair, transparent and confidential relationships in the company.

## CORRESPONDENCE WITHIN ALKALOID

The tone of communication within the company should be professional and polite and give the impression of respect for the other party. The written correspondence should be in the same manner. In line with this principle, we recommend that the written communication (e-mail) starts with a professional, i.e. business addressing, to avoid the exclamation mark, as well as the options for highlighting the letters (bold and / or caps lock). The text should be concise, clear and accurate so that the recipient can quickly and easily understand the content.

# PHARMACEUTICAL COMPLIANCE

- » Interaction  
with healthcare  
professionals
- » Ethical promotion



## WHAT IS IT?

The pharmaceutical industry is highly regulated and running business operations in this area requires strict compliance with all legal, regulatory and Good Manufacturing Practice (GMP) requirements, in order to maintain our manufacturing license and certificates of compliance with good manufacturing practice requirements. Compliance means that our actions and conduct are in line with and in accordance with laws and regulations, industry codes, and high standards of Alkaloid's integrity defined by the Code herein.

## WHY IS IT IMPORTANT?

In a period of increased regulatory control globally, reports of strict financial convictions and criminal prosecutions of companies that have irregularities or are not sufficiently compliant with high industry standards, laws and regulations are becoming more common. This trend applies not only to the marketing and sales of pharmaceutical products but also to other areas of operation, such as quality control in manufacturing operations, drug safety reporting, patient privacy, pricing policies, and so on.

Therefore, as never before, compliance with regulations, standards and laws is our number one priority.

## HOW DO WE DO IT?

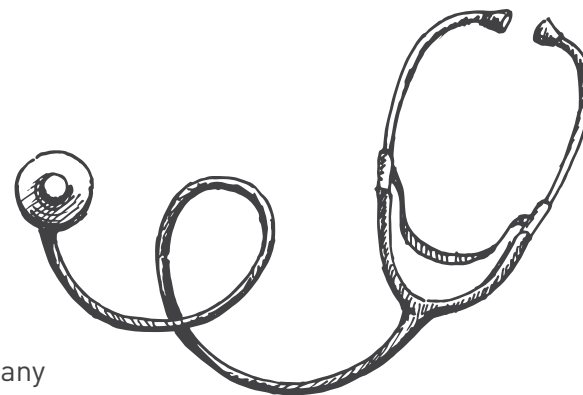
Alkaloid allocates significant resources and efforts to ensure compliance with all laws and regulations and to meet the high requirements and standards for conducting business operations in the pharmaceutical industry. We make this commitment, above all, to bring our products to the patients who need them. We strive to maintain high ethical, scientific and clinical standards in all our activities.

Alkaloid believes that the sense of responsibility of each employee is the basis of compliance. Therefore, we constantly work to identify, assess and manage compliance risks that are included in our business responsibilities.

When it comes to interacting with healthcare professionals, we are guided by our high standards of ethical promotion. In its interactions with health professionals and health institutions, Alkaloid is committed to full integrity, fair compensation and high transparency.

For us, communication with all stakeholders in the health care system takes a special place of importance and we do our best to ensure that our people transfer accurate information in accordance with the regulatory approvals for our products.

## INTERACTION WITH HEALTHCARE PROFESSIONALS



Any member of the medical, dental or pharmaceutical profession, nurses or any other person who provides health services professionally or can prescribe, recommend, buy, supply or administer a pharmaceutical product intended for patients is considered a healthcare professional.

Our relationships and interactions with healthcare professionals are legal and ethical and are aimed at strengthening their knowledge and practices in medicine for the greater benefit of patients. Our interactions with healthcare professionals aim to better inform and educate them about our products, share news and scientific information on various health topics.

At Alkaloid, we are committed to ensuring the highest standards of ethics and good business practices in our interactions with individuals or healthcare organizations, as required by industry law and practice.

Line managers are obliged to provide regular education and information to employees, related to local regulations for interaction with healthcare professionals. They should constantly monitor the level of knowledge and implementation of the regulation by the employees.

Our employees are not allowed to offer or give anything of value, with the intention of influencing or encouraging the recipient directly or indirectly to prescribe, recommend or purchase our products.

The information shared during the interaction with healthcare professionals, whether it is individual visits or larger gatherings (workshops, congresses, educational lectures, etc.), are always balanced, accurate and designed to provide accurate and appropriate information about our products and new medical practices.

Participation at or organization of all meetings and events, whether they have a medical or promotional purpose, should clearly focus on science, medicine and education regarding the content presented by Alkaloid.

## WHAT IS EXPECTED FROM US?

Alkaloid demands and expects a high level of corporate responsibility from all its employees, in all activities aimed at healthcare professionals. We always expect adherence to high ethical standards in approaching and managing the interaction with our partners and in achieving our business goals.

In all countries where Alkaloid operates directly, our employees are obliged to respect the policies and standards of Alkaloid, local laws and regulations, as well as local industry codes governing interaction with healthcare professionals.

Please seek advice or assistance from your line manager or local compliance manager, if applicable, for any activity you are unsure about.



**Dilemma:** I am considering to give priority to one business partner over another in order to achieve my business goal. Is achieving a business goal a valid justification for giving preference?

**Answer:** Certainly not. At Alkaloid, achievements are not only measured in terms of results achieved, but also how those results are achieved. A business goal is never an excuse or justification for violating our integrity standards. Each individual is responsible for their own behavior.

### ➤ Remember:

We work in an industry that is highly regulated and therefore we have a great responsibility for the way and the approach in which we act when interacting with healthcare professionals. We expect each of our employees to act in accordance with the regulations for ethical and transparent work while interacting with healthcare professionals. Compliance guarantees sustainability of operations and growth of the company. It does not matter to us whether the results are achieved, but how those results are achieved.

## ETHICAL PROMOTION

The promotion of our pharmaceutical products must always be accurate, balanced, ethical and must not mislead healthcare professionals. The information contained in our promotional materials gives an appropriate assessment of the benefits and risks of our products during their use, according to the information contained in the summary of product characteristics.

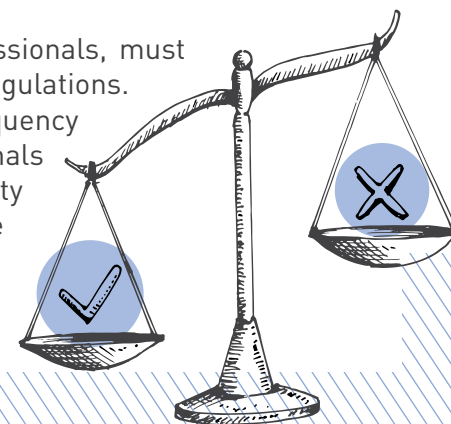
Alkaloid promotes rational use of drugs during promotional activities and always presents the properties of pharmaceutical products objectively, without exaggeration thereof.

It presents the comparison between different medicines in a way that is founded on relevant and comparable aspects, based on published scientific evidence. During any comparative advertising we must be careful that the information is not misleading or degrading to the comparative product.

We respect the privacy and personal information of the patient if we come in contact with them during the promotional activities.

Alkaloid medical representatives, through whom we interact with healthcare professionals, must comply with all relevant industry codes, including applicable local laws and other valid regulations.

They are expected to respond to their duties responsibly and ethically, to ensure the frequency and duration of visits, in a way that will not cause inconvenience to healthcare professionals or patients. Our medical representatives pay close attention to their personal integrity and the corporate identity of the company during the promotional activities for the medical professionals.







**Dilemma:** I am working on a marketing campaign for a new product. I have noticed that the proposed product statement is not entirely true. Should I raise the issue with the people in charge?

**Answer:** Yes. Contact your line manager directly about the case. We are responsible for ensuring that information about our products and services is improved, based on scientific evidence, and that no misconceptions are made.

### ➤ Remember:

The pharmaceutical marketing of prescription and non-prescription medicines, run by our responsible services, in each country must be conducted in accordance with all applicable local laws, regulations and codes governing ethical promotion.

In a period of increased regulatory control, it is important for each of us to be aware of the seriousness of the consequences of unethical promotion and of violating the regulations and laws that govern it. We expect our employees to show a high level of responsibility and integrity in all areas when promoting pharmaceutical products.

Alkaloid builds its business operations observing the rules of fair competition, without violating the laws and regulations for reducing the competition.

Alkaloid will not tolerate any violation of the standards of ethical promotion, regulated by local laws and codes in the countries where we conduct direct and indirect promotion of our medicines.

On the other hand, we encourage the responsible persons for marketing of pharmaceutical products to constantly think about new and creative ways of building awareness for our brands, in accordance with high ethical standards for promotion.

## FINAL MESSAGE

Our success story today is based on the constant efforts of our people and every subsequent success depends on all of us. We are one big team, a synergy composed of many ideas, experiences and knowledge. By observing our Code and our **core values**, we help build and maintain an inclusive, positive and respectful work environment for all of us. Every day together we build trust, which is the basis for our success.

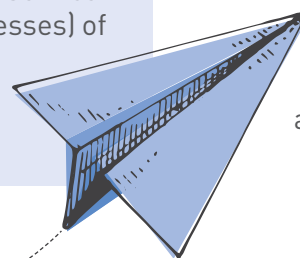
Alkaloid's Code of Conduct reflects the corporate culture and aims, in line with the core values of our company, to define the desired ethical and moral behavior of each of us. None of our activities, at work or at home, should damage Alkaloid's reputation.

The Code of Conduct is complemented by a number of policies, procedures and regulations, which cover specific areas of operation in detail and provide comprehensive guidelines for conducting activities. Access to work procedures, which are part of our integrated management system, is regulated through the Quality Assurance Department (local persons responsible for quality assurance in our companies), while corporate policies and regulations are governed through our corporate legal service. The contacts (direct telephone numbers and e-mail addresses) of all the departments in the company, as well as the Code itself can be downloaded from our website.

Should you have any questions regarding Alkaloid's Code of Conduct, contact your line manager, second line management, where applicable, directly or with the Corporate Compliance Officer, through the indicated communication channels.

All policies, procedures, guidelines, standard operating procedures and instructions applied at Alkaloid are available in the AlkaDMS software;

Each document has a unique identification code and users' authorized access to its valid version.







**ALKALOID**  
**SKOPJE**

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*Health above all*