



AL MOUDAWI PHARMACEUTICAL  
& MEDICAL EQUIPMENT TRADING CO.  
شركة الموداوي لتجارة الأدوية والأجهزة الطبية

# Code of Conduct

*Doing the right thing*

# OUR CODE OF CONDUCT

## Approvals

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# OUR CODE OF CONDUCT

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# EXECUTIVE STATEMENT

- ❑ We need a common point of reference for discussions on ethics and compliance in our company, and that is what the Code of Conduct offers.
- ❑ By asking everyone to take these measures, we aim to enhance the quality of our ethical decisions.
- ❑ Al Moudawi wants to give all employees the best possible conditions to act responsibly; therefore everyone receives regular compliance training.
- ❑ Anyone who is concerned about breaches of the Code of Conduct is instructed to discuss these with their manager. Al Moudawi does not accept any retaliation against anyone who raises a concern in good faith. By embracing these standards and continuously monitoring compliance, we will continue to uphold Al Moudawi's reputation as a respected and responsible pharmaceutical company.

# OUR VALUES

- ❑ **Our values guide our actions and decision making, so we can work "Together for a better healthcare" with one goal in mind: to create a unified working process that provides people with safe and effective products to become the leading distribution company in Iraq.**
  
- ❑ **Al Moudawi Values**
  - **Integrity:** Honesty, diligence and reliability are the basis of all business.
  - **Respect:** Supporting colleagues and communities around us.
  - **Diversity:** Embrace diversity and individuality so we can all achieve great things.
  - **Transparency:** Help us build trust with each other by being honest and open about how and what we do.
  
- ❑ **Our expectations**
  - **Maximum Utilization of Resources:** continuous development of competencies and procedures.
  - **Quality of Products and Services:** deliver the best product and service.
  - **Speed of Operations:** efficient, effective and timely work processes.
  - **Communications and Cooperation:** Open, clear, accurate and timely communication.
  - **Accountability:** Performance based on SMART objectives and relevant KPIs.

# Al Moudawi's Internal Framework

- ❑ **Documents, training and monitoring** are the active elements in our Compliance Structure that is established to ensure we are doing the right thing and continually improve our compliance processes.
- ❑ Code of Conduct conveys Al Moudawi's commitments and the expectations to our employees for areas that are critical to the pharmaceutical industry. All employees and third parties working on behalf of Al Moudawi are obliged to observe the Code of Conduct, and adhere to the **(ABAC) anti-bribery anti corruption policy** as part of our code of conduct.
- ❑ We want to make sure that the requirements are understood and the relevant parties know how to act. Therefore we **communicate** to maintain awareness and engage our employees in training activities.
- ❑ Our **monitoring** efforts aim to validate the understanding of the requirements and capture suggestions for improvements of processes and controls.

# HOW TO RAISE A CONCERN

- ❑ We believe that an open and honest dialog is a fundamental part of our business and we encourage everyone to have ongoing conversation on compliance and ethical dilemmas. However, we realize that some dilemmas or concerns might not be discussed openly.
- ❑ If you believe a concern is not being properly addressed, you can approach the relevant Corporate Function e.g. HR & Legal:
- ❑ Please remember that failing to report a breach may in itself be a breach of the Code of Conduct. Willful violation will result in contract termination.

OPTION ONE  
SPEAK TO YOUR MANAGER

Resolution Process

Following deliberation, the Line Manager must reply within 24 hours or maximum 48 hrs. On receipt of the Grievance the HR manager must deliberate & reply to the Employee within 24hrs or max 48 hrs.

SPEAK UP

OPTION TWO  
RAISE A CONCERN WITH HR MANAGER  
AND LEGAL OFFICER  
HRM: (admin@almoudawi.com)

OPTION THREE  
REPORT CONFIDENTIALLY ONLINE, BY  
TELEPHONE OR BY EMAIL OR SUBMIT A  
REPORT BY POST

# DEFINITIONS

- ❑ Please note that the definitions in the Code of Conduct are local and may vary from global definitions:
  - **BRIBERY** means to offer, promise, give or receive any undue pecuniary or other advantage, whether directly or through intermediaries, to obtain or retain business or other improper advantage.
  - **CONFIDENTIAL INFORMATION** is business sensitive or critical information about e.g. products, processes, operations, production, sales or customers of which the unauthorized disclosure could cause damage to our interests or the interests of the party that the information pertains to.
  - **CONFLICT OF INTEREST** is a situation in which the personal or private interests of an individual seem to collide or potentially could collide with the interests of Al Moudawi. Such conflicts of interest may be financial or non-financial interests, including but not limited to serving as a public official in a related decision-making capacity or having family connections to Al Moudawi employees.
  - **Donation** is a voluntary contribution provided without receiving any benefit, compensation, favour or advantage in return.

# DEFINITIONS

- **ISSUES THAT MAY AFFECT COMPETITION** could be issues that affect price mechanisms, market shares or could create a monopoly or lead to abuse of a dominant market position. Issues that could require involvement of Corporate Legal include pricing policies, trading terms, pricing practices of distributors, marketing plans, profits, market shares, distribution practices, bids, production levels, boycotts, selection of customers, sales territories or cutting off.
- **PERSONAL DATA** is any information, which relates to a particular individual who is or can be identified including, but not limited to, name, personal address, e-mail addresses, performance appraisals, data concerning health, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership. There are different categories of personal data, which result in different requirements relating to the collection, processing and transferring of personal data.
- **PHARMACOVIGILANCE** is the science and activities relating to the detection, assessment, understanding and prevention of adverse effects or any other medicine-related problem.
- **PROMOTION** is any activity undertaken, organized or sponsored by or on behalf of a pharmaceutical company, which promotes the prescription, supply, sale, administration, recommendation or consumption of its medicinal products. Also providing non-promotional information in a promotional context, e.g. presenting strictly scientific information or disease awareness at a promotional event, is promotion.
- **SUPPLIER** is a legal entity that invoices Al Moudawi directly or indirectly for a product or service. This definition includes the narrower subset of suppliers that are third parties to Al Moudawi.
- **THIRD PARTIES** are professionals and entities performing activities within Al Moudawi's core business areas either on behalf of or in the material interest of Al Moudawi.

# RESPONSIBLE AND TRANSPARENT INTERACTIONS

- ❑ We engage with clients/customers as part of our business and because it is essential for us to understand their expectations, needs and concerns with regard to our activities and the related impact on society. These interactions are kept appropriate, transparent and free of any undue influence or conflicts of interests.
  
- ❑ **AI MOUDAWI WILL ENSURE THAT**
  - Our employees are instructed to act in accordance with local laws (MOH code of ethics) and our Code of Conduct.
  - Third parties are advised to abide by our ABAC policy (Anti-Bribery Anti Corruption)
  - Communication guidelines are maintained and relevant employees and third parties receive training and proper communication in these.
  - Our employees and third parties act with professionalism and safeguard our integrity and values.
  - Our employees and third parties perform their work in the interest of Al Moudawi without bias or conflicts with their own professional or personal interests.
  - Our agreements contain the relevant requirements, ethical and legal standards that our stakeholders are asked to uphold.
  - Relevant principles and processes are available to allow necessary, legitimate and mutually beneficial interactions with public officials.
  - We maintain processes and systems to ensure that Al Moudawi's books and records are accurate and sufficiently detailed.

# RESPONSIBLE AND TRANSPARENT INTERACTIONS

## ❑ YOU ARE EXPECTED TO

- Introduce yourself by name and state your relation to Al Moudawi when you represent Al Moudawi.
- Keep your communication factual, specific and precise, and avoid making unqualified judgements or speculations.
- Take due care that your interactions have a professional purpose, and are kept appropriate and free of any undue influence.
- Never engage in any relationship that could create a conflict of interest, and immediately notify your manager, if you find yourself in a conflict of interest.
- Hire third parties based on clearly identified, legitimate needs and objective selection criteria, use agreements containing Al Moudawi's standard requirements where possible, and ensure that third parties are obligated to adhere to the principles of Al Moudawi's Code of Conduct.

# FAIR AND OPEN COMPETITION

- ❑ **We are committed to**
- ❑ **the principle of fair, free and efficient competition. We work to ensure local competition law compliance in order to preserve and protect free and open competition and avoid abusive behavior that may restrain competition.**
  
- ❑ **AI MOUDAWI WILL ENSURE THAT**
  - We implement and maintain effective competition compliance throughout our business.
  - Relevant Al Moudawi employees are trained to comply with local competition policy in Iraq. ([www.almoudawi.com](http://www.almoudawi.com))
  
- ❑ **YOU ARE EXPECTED TO**
  - Never restrain competition through agreements, arrangements or understandings that restrict competition.
  - Bid for contracts and tenders independently from and without any agreement or arrangement with our competitors.
  - Never exchange competitively sensitive information or engage in discussions that may lead to the co-ordination of competitive behavior.
  - Never share with competitors information about current or future pricing, or any information that might affect prices or pricing practices.
  - Always involve Corporate Legal, if issues that may affect competition are brought up by competitors, authorities, distributors, suppliers or third parties. ([admin@almoudawi.com](mailto:admin@almoudawi.com))

# Anti Bribery- Anti Corruption (ABAC)

- ❑ **Please refer to ABAC policy attached document for the following sections:**
  - Anti Corruption – Anti Bribery
  - Interactions with healthcare professionals and patient organizations
  - Donations and Grants
  - Due diligence
  
- ❑ **Addressed to:**
  - Employees
  - Health care professionals
  - third parties & government officials
  - Al Moudawi clients/customers.
  
- ❑ **Raise Concerns**
  - Suspected policy violations of a serious nature, such as those involving high levels of management, significant amounts, or alleged criminal activities should be escalated by the HR department and legal officer to the General Counsel (*rasool.albanna@almoudawi.com*) immediately

# CONFIDENTIAL INFORMATION AND PERSONAL DATA

- ❑ **We understand the importance of protecting confidential information and personal data. We want to protect our assets and proprietary information, prevent the unauthorized disclosure of this information, prevent insider trading and safeguard the integrity of our customers/clients, employees and partners/suppliers.**
  
- ❑ **AI MOUDAWI WILL ENSURE THAT**
  - Security policies and procedures are in place to protect and prevent the unauthorised disclosure of confidential information and personal data.
  - Advice on handling confidential information and personal data is available to our employees. *(confidentiality and secrecy policy)*
  - Tools and guidance, including agreements containing Al Moudawi's standard requirements, are in place to help employees protect confidential information and personal data. *(disaster recovery policy)*
  
- ❑ **YOU ARE EXPECTED TO**
  - Consider whether information is confidential before disclosing it.
  - Be responsible for the proper use and protection of confidential information and personal data, including careful use of our IT systems.
  - Never disclose proprietary or confidential information to anyone outside Al Moudawi without executing a secrecy agreement approved by Corporate Legal or local legal counsel.
  - Understand and comply with internal regulations relating to protection of personal data.
  - Ensure the necessary agreements are in place before, collecting, processing or transferring personal data to third parties.
  - Only collect, process, disclose or store personal data if it has a legitimate business purpose.
  - Delete personal data in accordance with Al Moudawi's procedures when there is no longer a legitimate business purpose.
  - Never pass on inside information to any other person or encourage anyone to trade based on inside information.

# PROMOTIONAL ACTIVITIES

- ❑ **We acknowledge that the promotion of medicinal products is strictly regulated and monitored by authorities and we are committed to complying with applicable regulations. We maintain processes and provide extensive training to ensure that promotional activities are appropriately evaluated and approved.**
  
- ❑ **AI MOUDAWI WILL ENSURE THAT**
  - Our employees and third parties that perform informational or promotional activities are trained to comply with current laws and regulations as well as industry and AI Moudawi standards on promotional activities.
  - Procedures and systems are in place to ensure that promotional activities provide current, fair, accurate, balanced, objective and sufficiently complete information on the product.
  - Promotion only takes place for products for which AI Moudawi or a partner company holds a marketing authorization and only for indications within the product label.
  - AI Moudawi medicinal product samples only are provided upon request, in accordance with local laws and regulations and with written receipt by healthcare professionals.
  
- ❑ **YOU ARE EXPECTED TO**
  - *PLEASE REFER TO MOH-AI Moudawi CODE OF ETHICS DOCUMENT ADDRESSED TO AI Moudawi EMPLOYEES.*

# HUMAN RESOURCES

- ❑ **We support diversity in our workforce and promote learning and development at an organizational, team and individual level. We believe that respect for the individual is the foundation of a high performing company.**
  
- ❑ **AI MOUDAWI WILL ENSURE THAT**
  - Our human resources (HR) policies and procedures comply with applicable laws and guidelines.
  - Diversity among our employees and managers is supported, valued and used as an asset in our innovative and learning environment.
  - Respect for each employee's integrity is maintained and that discrimination and harassment are never accepted.
  - Each of our employees has the opportunity to develop the competencies that are necessary to achieve the expected results.
  - Recruitment, acknowledgement and recognition are based entirely on personal abilities, performance, potential and behavior.
  - Due diligence is required before hiring any employee , *please refer to [ABAC policy](#) for details.*
  
- ❑ **YOU ARE EXPECTED TO**
  - Be familiar and comply with Al Moudawi's HR approach as expressed in this Code of Conduct.
  - Treat others with decency and show respect for differences, varying ideas and perspectives among your colleagues.
  - Promote a positive and inclusive work environment that is free from discrimination and harassment.
  - Take an active part in the development of your professional skills and competencies.
  - Offer and ask for feedback to promote learning for yourself as well as for your colleagues.
  - Challenge the status , make suggestions for change and be adaptive.
  - Report concern to your immediate manager or your HR manager about behavior that does not comply with this Code of Conduct.

# HEALTH, SAFETY AND ENVIRONMENT

- ❑ **We provide a sound working environment for our employees and we act responsibly to minimize our impact on the environment. We promote continuous improvements through cooperation between managers and employees with support from specialists who provide knowledge and effective solutions .**
  
- ❑ **AI MOUDAWI WILL ENSURE THAT**
  - Our work environment and safety & security policy serve as a minimum comply with applicable regulations.
  - Our employees have the working conditions and knowledge that are required to carry out their jobs in a healthy and safe manner, and to minimize the impacts on the environment.
  - Safety and security considerations are made systematically when establishing new facilities and developing new products and processes.
  
- ❑ **YOU ARE EXPECTED TO**
  - Participate in training activities to understand your part in fulfilling Al Moudawi's S&S policy.
  - Understand and follow Al Moudawi's requirements to effectively manage the significant S&S aspects related to your job.
  - Act in a safe and prudent manner.
  - Actively participate in surveys and support solutions to improve the physical and psychological working conditions.
  - Take an active part in protecting the environment by reducing waste and minimizing consumption of energy and other resources.
  - Consider S&S risk related to your job and immediately inform your manager about any actual or potential S&S concerns.

# ENVIRONMENTAL PROTECTION

- *PLEASE REFER TO RECYCLING PROCEDURE*

# PATIENT SAFETY AND CARE

## ❑ **Protecting our customers**

- We gain our patients' and consumers' trust by focusing on their needs. That means always thinking from their perspective. We put their safety first, provide them with clear, up-to-date information and promote our products appropriately and ethically

## ❑ **Ensuring product information is accurate**

- We provide complete, up-to-date and evidence based product information to our medical teams regularly.

## ❑ **Reporting a concern about a Al Moudawi product**

- Anyone hearing of any information regarding a side effect, adverse reaction or any other human safety concern on a Al Moudawi product, including possible lack of effectiveness, must report it to the Pharmacovigilance Department, or the local operating company quality department within 24 hours.

# SUPPLIERS

- *PLEASE REFER TO DUE DILIGENCE SECTION OF ABAC POLICY.*

# NO TOLERANCE ON RETALIATION

- ❑ At Al Moudawi, you can report concerns without fear of reprisal. Al Moudawi prohibits retaliation against anyone who raises or reports concerns and will take disciplinary action up to and including dismissal against any employee who threatens or engages in retaliation or harassment of someone who has reported, or is considering reporting, a concern in good faith.
- ❑ Similarly, we will report an agency worker who retaliates against anyone raising a report or concern to the worker's employment agency and terminate their assignment with Al Moudawi.

# MISCONDUCT

- ❑ Misconduct may result in civil and criminal penalties in addition to disciplinary actions against Al Moudawi employees in reference to company's internal regulations and ABAC policy.



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