



CODE OF CONDUCT AND BUSINESS ETHICS

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" Integrity in Action,
Excellence in Every Decision "

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Introduction



Dear Team,

Our mission is to be the partner of choice for specialty pharmaceuticals and patient-centric solutions in Libya. We are committed to delivering safe, effective, and affordable medications, while developing innovative solutions that improve the lives of patients with severe and chronic conditions.

By collaborating closely with healthcare professionals and patient organizations, we ensure that our products and services meet patient needs. We aim to achieve scientific leadership in therapeutic areas and integrate patient-focused solutions such as treatment algorithms and adherence tools.

We are also committed to fostering a supportive work environment where our employees can thrive, think creatively, and take decisive action.

Our Code of Conduct and Business Ethics provides the framework for making the right decisions and upholding our values. We encourage all employees to review and follow the Code to ensure long-term success and a meaningful impact on patients' lives.

Thank you.

A handwritten signature in black ink, appearing to read "Hesham Akiel Senussi".

Hesham Akiel Senussi
Executive Director & Founder
AKEEL HEALTH



“ Each and every employee must be committed to doing the right thing.”

This Code of Conduct (the "Code") outlines the seven core principles and thirteen standards that are essential to maintaining the integrity of our business. Regardless of whom we engage with or where we operate, we are committed to conducting our business ethically and in full compliance with all local, national, and international laws and regulations.

This Code is supported by a set of policies and procedures designed to help employees and contractors working on Akeel Health's behalf implement the ethical behaviors required by the Code.

Each supporting policy is an integral part of this Code and must be followed at all times when conducting Akeel Health business.

Akeel Health is dedicated to communicating the requirements of this Code to all employees and contractors working on our behalf. We also run an ongoing training and certification program to ensure our staff are equipped to conduct business in line with the standards outlined in this Code.

Who Does This Code Apply To?

This Code applies to all full-time and part-time employees of Akeel Health, as well as all temporary staff across the global Akeel Health group of companies. Additionally, it outlines the principles and standards that we expect third parties to adhere to when conducting business for or on behalf of Akeel Health.

Our Core Principals



At Akeel Health, we are committed to operating our business in accordance with the following seven core principles. These principles embody the spirit of the obligations and responsibilities outlined in this Code.

Commitment to Excellence

Akeel Health applies the highest standards of quality in everything we do – from our systems and processes to our manufacturing, operations, and products.

Dependability & Responsiveness

Akeel Health is a consistent and reliable business partner. We strive to meet or exceed customer expectations, actively listen to the requests, suggestions, and complaints of our customers, suppliers, and employees in good faith, and respond appropriately.

Respect & Dignity

Akeel Health respects the dignity and human rights of all individuals. We prioritize privacy and confidentiality in our business practices, ensuring the protection of customer, employee, and counterparty information. We are committed to non-discrimination and provide equal opportunities for all.

Upholding Integrity

Akeel Health does not condone or participate in any form of corruption and refrains from doing business with those who do not meet our standards. Our commitment to business integrity is never compromised.

Employee Growth

Akeel Health invests in its employees, offering opportunities to enhance their skills and knowledge within a safe and healthy work environment.

Openness & Honesty

Akeel Health conducts business with transparency and integrity. We provide stakeholders with relevant, accurate, and timely information. All our transactions are recorded fairly and accurately and are clearly reported.

Social Responsibility

Akeel Health recognizes its role in the communities where we operate. We are committed to promoting economic and social development, environmental responsibility, and supporting diversity and social integration.



Akeel has a zero tolerance of bribery and corruption.

All directors, officers, employees, and individuals working for Akeel Health, as well as those involved in joint ventures where Akeel Health holds equity control, are strictly prohibited from offering, accepting, or giving any form of bribe or inducement, whether directly or indirectly. This includes money or anything of value aimed at:

- Influencing decisions in Akeel Health’s favor, whether made or withheld as a reward.
- Gaining an unfair business advantage or unduly influencing business activities.
- Compromising impartial judgment or the ability to act objectively.

This policy applies to all interactions with individuals and organizations Akeel Health engages with – including healthcare professionals, customers, suppliers, regulatory bodies, professional organizations, and non-governmental organizations, regardless of their geographical location.

Akeel Health will perform thorough due diligence on its business partners. We will avoid conducting business with any third parties who are involved in corrupt activities or fail to meet the standards we uphold.

At Akeel Health, we are committed to:

- Acting with honesty, integrity, and ethics in all company dealings.
- Never engaging in or tolerating bribery or any form of corruption.
- Refraining from giving or receiving gifts or hospitality where it could suggest any corrupt intent

Gifts, Entertainment and Conflicts of Interests



We do not offer or accept gifts or entertainment that could compromise our personal integrity.

Akeel Health recognizes that giving or receiving gifts and entertainment can sometimes be part of standard business practices and cultural traditions. In these cases, gifts or entertainment may be appropriate as long as they are given with genuine intent and not to unduly influence the recipient, whether it is a third party or an employee of the company.

Even the appearance of an improper gift or entertainment could negatively affect the company's business operations and reputation. Therefore, employees must exercise discretion when giving or accepting gifts and entertainment in their dealings with business partners, vendors, suppliers, and other third parties.

We must comply with the following guidelines when giving or accepting gifts or entertainment:

- Gifts and entertainment should be of reasonable value, in line with customary business practices and cultural expectations.
- Gifts and entertainment must not be extravagant, excessive, or exchanged with the expectation of reciprocity.
- Requesting or soliciting gifts or entertainment is strictly prohibited.
- The giving or receiving of gifts and entertainment must align with the Code of Conduct, the company's policies, and applicable procedures, particularly those related to anti-bribery, anti-corruption, and interactions with healthcare professionals.

Conflicts of Interests

Akeel Health recognizes and respects employees' right to participate in outside activities. However, employees should avoid situations where personal interests conflict with the Company's best interests, or where a conflict of interest could appear. Conflicts may arise from internal company activities, external employment, vendor relationships, human resource decisions, or other situations where an employee's interests don't align with the company's goals.

Employees should never misuse their position or company resources for personal gain. All business activities must prioritize the Company's interests, free from personal, family, or financial influence. Employees must disclose potential conflicts of interest to their manager or the Human Resources, Legal, or Compliance Departments.

Anti-Slavery



Anti-Slavery (Compliance with the Modern Slavery Act)

Akeel Health is committed to ensuring that modern slavery, including forced or compulsory labor and human trafficking, does not occur within any of its operations or supply chains globally.

To uphold this commitment, Akeel Health will:

- Provide training to staff on labor standards and equip them with the knowledge to identify and address instances of modern slavery.
- Conduct regular assessments and management of potential modern slavery risks in Akeel Health's operations and supply chains.
- Perform thorough due diligence and engage with supply chain partners to address and mitigate modern slavery risks.

Trading Customers & Suppliers

Akeel Health is committed to maintaining open and honest communication with its customers and suppliers, while respecting confidentiality and competition requirements. Akeel Health believes in engaging with customers and suppliers in a fair and transparent manner to foster successful, long-term partnerships.

Akeel Health will actively participate in fair and open competition and will not pursue competitive advantage through unlawful practices. The company will refrain from any form of collusion with competitors regarding pricing, bidding, or market distribution, and will not share information with third parties in ways that could unjustly influence business results.

Akeel Health will adhere to all relevant trade regulations, restrictions, and sanctions established by recognized national and international authorities as they pertain to its business operations.

Trading Customers & Suppliers



At Akeel Health, we are committed to:

- Ensuring that all communications in customer-facing activities, such as marketing, sales, and research, are truthful and not misleading.
- Acquiring commercial information only through honest, legal, and ethical means.
- Safeguarding the confidential and proprietary information of both suppliers and customers, using it strictly for its intended purposes.
- Sharing sensitive or non-public information with third parties only when absolutely necessary for legitimate business purposes.
- Avoiding participation in any anti-competitive behavior or entering into agreements that restrict fair competition.
- Adhering to all applicable trade restrictions and sanctions in our operations.

Akeel Health strives to work with customers and suppliers who uphold human rights in their employment practices and meet the ethical standards that Akeel Health sets. The Code of Conduct is available for reference on our website.





Akeel Health is dedicated to maintaining the highest quality standards for the products we carry and the information provided about them.

While ensuring full compliance with the regulations in the jurisdictions where we operate, Akeel Health is committed to providing customers with accurate and well-balanced information about the products we carry.

Akeel Health distributes products through various channels and is dedicated to communicating with customers in a proper and precise manner, adhering to all relevant laws, regulations, and industry codes as a minimum standard. Products will only be marketed for their approved uses. Akeel Health will address customer complaints promptly in line with its regulatory responsibilities.

At Akeel Health, we will:

- Present products in an ethical, appropriate, and transparent manner.
- Comply with local laws, regulations, and relevant industry pharmaceutical codes of practice in product promotion.
- Provide customers only with properly authorized and approved marketing materials.

Communications, and Disclosures of Records



Akeel Health is committed to maintaining clear communication with our stakeholders regarding our business, governance, and financial status. We uphold transparent accounting practices and ensure the accuracy of our records.

Akeel Health aims to ensure that all communications are timely, accurate, and clear, providing a fair and transparent view of the subject matter, regardless of whether the information is favorable or not.

At Akeel Health, we will:

- Maintain books and records that reflect a fair, transparent, and accurate representation of our business activities and financial position.
- Implement information management systems to ensure compliance with all relevant legal, regulatory, environmental, tax, employment, and trade requirements.
- Provide stakeholders with relevant and accurate information regarding our business, and disclose key financial and operational updates when necessary.
- Respond openly and transparently to inquiries from our stakeholders regarding governance and the company's activities.
- Provide a clear overview of our governance and ensure effective communication with stakeholders through our internal reports.

Employee Affairs



Akeel Health promotes a discrimination-free workplace, ensuring respect, dignity, and equal opportunity while protecting employees' rights. We value workforce diversity and are committed to fostering an environment where individuals can thrive based on talent, experience, and performance.

- Akeel Health ensures equal employment opportunities for all and does not tolerate discrimination.
- A fair and transparent system is in place for managing rewards and promotions.
- Akeel Health recognizes and respects employees' right to freely associate and engage in collective bargaining.
- The need for training and development is central to the ongoing growth of our people, as well as their skills and knowledge.
- A clear and transparent process exists for receiving and addressing employee suggestions, requests, and complaints.
- No form of violence, bullying, or harassment is permitted within the workplace.
- Effective communication with employees is promoted, ensuring issues arising from business decisions are addressed in a timely and appropriate manner.
- Akeel Health is committed to safeguarding employee rights and complying with all relevant employment laws and regulations.

Employee Personal Information

- Akeel Health implements adequate measures to protect the privacy of employees and ensure the security of their personal data.
- Only personal information essential for legitimate business, human resources, or legal requirements will be gathered or stored.
- Employees are clearly informed about how their personal information will be used and for what purposes.
- Personal information is only shared with third parties who need to know it for a legitimate legal purpose
- Data protection and associated laws applicable to the countries in which we gather and hold personal information are complied with



SUPPORTING PEOPLE AND COMMUNITIES

WE VALUE OUR
EMPLOYEES, OUR
COMMUNITIES AND
THE ENVIRONMENT
AROUND US.

Health and Safety



At Akeel Health:

- Health and safety policies are developed, enforced, and regularly updated to protect employees from preventable injuries.
- A "no smoking" policy is maintained across all factories and office buildings, ensuring a substance-free work environment.
- Employees' well-being at work is a top priority.
- Individuals are trained to understand and manage the hazards associated with their work.
- Health and safety laws and regulations are understood and adhered to, ensuring the protection of both employees and visitors in our facilities.

Community Impact and Engagement

Akeel Health is committed to positively impacting the communities it serves through charitable donations, volunteerism, and its social and environmental policies. The company engages with local communities to promote health awareness, support public policies for economic and social development, and respect cultural values. Akeel Health collaborates with local businesses and hires locally whenever possible. It provides financial support and donates medicines through registered charities and NGOs, especially in crises. Akeel Health also participates in volunteer activities focused on education, patient care, and healthcare improvement.

At Akeel Health, we are committed to:

- Encouraging employees to get involved in local health awareness initiatives.
- Supporting employee participation in community volunteer projects, including during Akeel Health Global Volunteering Day.
- Engaging in civic activities that foster economic and social progress.
- Ensuring that all of our community and charitable engagements are free from conflicts of interest.



The Environment

Akeel Health is dedicated to protecting the natural environment in which it operates, viewing sustainable development as a key aspect of its responsibility as a business.

Akeel Health continually works to minimize its environmental impact, with a focus on reducing waste, assessing carbon emissions, monitoring and reducing energy usage, and limiting water consumption.

At Akeel Health, we are committed to:

- Encouraging employees to participate in Akeel Health’s environmental initiatives.
- Promoting sustainable development through ongoing efforts to reduce waste, increase recycling, and lower energy consumption.
- Training and educating employees on the environmental impact of the business and ways to minimize it.

Safeguarding Assets, Systems, and Financial Resources



Akeel Health's assets must not be misused and should solely be utilized for the purpose of conducting the company's business. These assets must not be used for personal benefit or any fraudulent activities.

It is the responsibility of all Akeel Health employees to safeguard the company's assets, including confidential and proprietary information, financial resources, and equipment.

Akeel Health employees will:

- Refrain from any actions that could jeopardize the integrity of Akeel Health's computer systems, communication networks, or security protocols.
- Adhere to company policies regarding the security of systems and the safeguarding of sensitive information.
- Avoid misappropriating company assets or using them for any purposes outside the scope of their professional duties.

Confidential Information

Confidential information must be safeguarded against unauthorized disclosure. Any sharing of confidential information should be restricted to individuals who have a legitimate need to know that information.

- Safeguard our confidential information and share it with others, both inside and outside the company, only when authorized.
- Inform senior management of any potentially important business developments to ensure they are evaluated in line with our disclosure responsibilities.
- Ensure Non-Disclosure Confidentiality Agreements (NDA), are established with third parties before sharing any confidential information.

Public Relations and Government Engagement



All public relations activities conducted by or on behalf of Akeel Health must be carried out with integrity and in compliance with relevant local laws and regulations.

At Akeel Health, we will:

- Partner with public authorities to promote public health and safety as part of our role in producing healthcare products.
- Engage with legislators and other government officials to influence public policy on laws and regulations that may impact Akeel Health's operations.
- Avoid making political donations or misusing company resources to support any political entity or campaign.

Akeel Health employees will:

- Refrain from improperly involving Akeel Health in political campaigns or activities.
- Participate in public affairs only when explicitly authorized to do so.
- Respect the government's role in regulating and organizing society.
- Ensure that all interactions with government officials, especially concerning regulations and product approvals, comply with company policy, as well as anti-bribery and anti-corruption guidelines in this Code.
- Maintain the right to engage in personal political activities on their own time but must make it clear that such activities are not conducted on behalf of Akeel Health.



AKEEL HEALTH

Akeel Company LLC, For Importation of Pharmaceuticals and Medical Devices, and Preparations of Mother and Child.

Tripoli. Libya | www.akeelhealth.com