



RZECZNIK
STANDARDU ETYKI

CODE OF ETHICS

Employees of DOZ S.A. and its subsidiaries
(hereinafter referred to as the "DOZ")



PATIENT

AT THE CENTRE OF ATTENTION

Ladies and Gentlemen,

I am pleased to present you with the third edition of the Code of Ethics for Employees of DOZ S.A. and its subsidiaries. The Code is a set of principles and values that guide us in our daily work. It is also a source of knowledge, providing guidance on how to resolve the ethical dilemmas encountered.

As a company, we cooperate with more than 1,000 DOZ Pharmacies named dbam o zdrowie, employing more than 4,500 Employees **who take care of the safety of drug treatment of 4,5 million Patients per month.**

DOZ SA is part of the Pelion S.A. group. - the largest company in the healthcare sector in Poland and one of the largest companies built from scratch with Polish capital after 1989.

We have been caring for the health of our patients continuously since 2001, guided by our values: **development, trust and commitment.** We strive for growth by seeking innovative solutions. Trust is built on honesty, respect, and exceptional commitment. Putting **the patient at the center of our attention** is our mission, so we constantly strive to provide the best possible range of services, high-quality care, and the availability and safety of pharmacological therapy.

We are creating a friendly and stable workplace where we value communication and openness to new challenges. We work with passion, consistency and determination. We clearly define goals and objectives and inspire each other to action.

Since 2018, we have held the title of **Ethics Standard Advisor** awarded by Global Compact NetWork Poland to companies that promote and adhere to transparent business principles and ethical values.

As a company recognised once again as a **best place to work**, we feel obliged to promote ethical standards of conduct. We are also aware that working in healthcare, which requires great responsibility, often involves facing ethical dilemmas. In such situations, the Code of Ethics can be helpful and provide directions for appropriate behaviour.

In the Code you will find, among other things, example questions and answers relating to ethically questionable situations, as well as a flow chart to facilitate decision-making. It is used to analyse a troublesome case and can help to solve it.

The Code is an open set of principles and we will continuously update and improve it. We would like it to help us build value and further strengthen our company's position in the demanding and competitive healthcare market.

Yours faithfully,



Alicja Koleśnik

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President of the Management Board of DOZ S.A.

Idea and content of the Code of Ethics

The DOZ Code of Ethics has been developed based on our core values and our mission with a view to embedding them among Employees and business partners and based on the needs of the Patient, who is at the centre of attention. They reflect the way we operate, we owe them our market success to date and we see them as opportunities for the sustainable development of our organisation.

We have created a Code of Ethics in order to facilitate decision-making and to find answers to questions that arise in everyday work life. It is a guide to the culture and principles adopted at DOZ, including information on the company's mission and values, an inventory of the company's policies in force, a guide to reporting violations of the Code of Ethics, a Q&A section updated based on emerging ethical dilemmas and a chart to facilitate ethical decision-making.

We have been awarded the title of Ethics Standard Advocate, which demonstrates that we are acting in accordance with the guidelines of the Ethics Programme Standard document, developed by Global Compact Poland based on the UN Guiding Principles on Human Rights and Business. The document recommends developments for companies and institutions.

We know that the Code of Ethics provides a useful tool to address issues that appear to be ethically questionable. Promotes behaviour worth emulating! Helps build positive working relationships and counteract abuse.

The Code of Ethics applies to all persons employed by DOZ, regardless of their position, length of service, type and form of contract concluded, length of service and responsibilities assigned. Employees should be well aware of its provisions and apply them in their daily work.

The provisions of the Code do not replace legal norms. Above all, all Employees are obliged to know and strictly apply national and international laws and detailed internal procedures insofar as they are relevant to their activities.

If you have any doubts regarding the interpretation and application of the provisions of the Code of Ethics, you are encouraged to contact the representative of the Ethics Committee, your supervisor or the HR Department of DOZ S.A.

Our Mission

We surround the patient with the best care and provide professional advice. Every day, we ensure that medicines are fully available and that the highest quality of service is provided.

By exceeding the expectations of our patients, we set new standards by consolidating our position as an industry leader and favourite Pharmacy.



PATIENT
AT THE CENTRE OF ATTENTION



Our Values

COMMITMENT

We work with passion, consistency and determination.
We are focused on task and open to new challenges.

We respond to the needs of our patients by ensuring the availability of medicines and professional counselling.

We make sure that the patient is in the centre of attention.

We involve employees in key company projects.

We inspire them to act and constantly seek new solutions.

We maintain long-term business relationships.

DEVELOPMENT

We look for innovative solutions and implement them effectively in order to always be one step ahead of the competition.

We are developing the availability and quality of our offer and services in order to provide our patients with professional care.

We care about sharing knowledge and experience, and we constantly strengthen our employees' skills so that they can grow together with our company. Working together with contractors, we strive for joint development

TRUST

We build relationships based on honesty and respect.

We care about the availability and safety of pharmacological therapy for Patients.

We clearly define goals and tasks, we support each other in our daily work, we take care of the company's image by building trust through responsible and transparent actions.

We are a reliable business partner, we fulfil agreements fairly and on time.



Our Principles



Patient at the centre of attention

We take the utmost care to protect the health of our patients to the extent that it is directly affected by our activities, and we are constantly improving our services and increasing their availability.



We build an Employee-friendly organisation

We offer employment in a friendly work environment, support professional and personal development, and promote a healthy lifestyle among our employees.



We work together for trust

We build an Employee-friendly organisation - we care about being a desirable business partner and we work with companies that share the values that are important to us.



We care about the company's values

We protect the reputation of the company and secure its tangible and intangible assets and legal rights against loss, theft, destruction, or misuse.



We protect free competition

We apply and promote high standards of fair competition.



We create a better reality

We are committed to improving the health of society.



We care about the natural environment

We are constantly looking for new opportunities to minimise the negative impact of our activities on the natural environment.

The Patient at the centre of attention



Key DOZ activities directly affect the availability and safety of pharmacotherapy for the Patient.

For this reason, the decisions and actions taken by each Employee can have an impact on a Patient's health regardless of the area involved. Keeping in mind the patient, their health and comfort, we are constantly improving both our internal organizational processes and the modern care tools we offer to Patients.



DOZ, as an entrepreneur, is obliged to ensure that Patients have access to the full range of products authorised for sale in publicly accessible pharmacies. Our staff carry out this duty without assessing the reasons for the patient's use and purchase of the product in question, and pharmaceutical care is carried out by authorised persons always full respect for the Patient's dignity and rights.

we ensure the highest standards of patient care and are committed to improving our competence in this area;

we strictly comply with the law, with particular emphasis on the Pharmaceutical Law, the Act on the Pharmaceutical Profession, the Act on Patient Rights and Patient Ombudsman, the Code of Ethics of a Pharmacist of the Republic of Poland, procedures and internal standards;

we actively participate in activities related to prophylaxis, education and health promotion;

we are committed to improving organisational solutions and tools to guarantee the availability of care and patient comfort;

we ensure that all communications to the patient relating to our products and healthy lifestyles, and in particular our medicinal products, are conducted in a fair, honest and objective manner, including the use of scientifically based information and avoiding misleading statements, and are characterised by a high level of responsibility for their possible impact on the patient's health;

we exercise autonomy in the provision of pharmaceutical care, pharmaceutical services and professional tasks, guided solely by the interests of the patient. We report any attempts to limit professional independence to the Ethics Committee;

we responsibly and competently inform the patient about the products and services offered by DOZ Pharmacies;

we strictly comply with legal regulations and internal procedures regarding the protection of personal data entrusted by patients;

we give priority to guaranteeing the quality and safety of the products we offer;

in case of knowledge or suspicion of the occurrence of any situation and events that may threaten or adversely affect the quality of the products offered and the safety of the patient's health (including, for example, possible doubts about the originality of the origin of pharmaceutical and medical products and any type of report relating to adverse drug reactions), promptly reported to a supervisor.

As DOZ Employees

We build an employee-friendly organisation



Employees are a key asset of DOZ. An important part of DOZ's social responsibility is to provide them with job security and supportive work environment.

DOZ ensures that the remuneration of Employees is appropriate to their performance, the type of work performed and the position held. It ensures that the environment in which they work is safe, free from bullying, discrimination and other forms of violence, and that the atmosphere within the company is conducive to the effective performance of their duties. In addition, to the extent of its resources, DOZ supports Employees through the implementation of social policies and implements solutions to help them take care of their health and fitness and work-life balance.

Caring for the development of Employees, DOZ has a personnel policy that helps to improve their competences and potential. DOZ involves Employees in the company's most important processes and provides real influence on the direction of the organisation.

It supports diversity resulting from the different cultural backgrounds of the countries from which the people employed come, and respects the diversity of views and interests.

It builds an atmosphere of mutual trust through open and reliable two-way communication.

At the same time, it does not tolerate behaviour and attitudes that may negatively affect the working atmosphere and relations between Employees.

we have a good knowledge and understanding of our responsibilities and the provisions of the company's rules and procedures;

we take care to build a positive atmosphere in the workplace, including mutual, open communication;

We actively promote the principle of equal treatment in the workplace;

in our interactions we show a high degree of personal culture and treat each other with respect;

we freely express our opinions and put forward ideas and our superiors consult us to find the best solutions;

we strive to resolve disputes amicably while respecting other views;

we do not discriminate against others on the basis of race, nationality, race, gender, sexual orientation, religion, age, political opinion, disability, etc., and we do not discriminate against others on the basis of race, nationality, gender, sexual orientation, religion, age, political opinion, disability, etc;

we do not use any form of verbal, physical or psychological humiliation, ridicule or harassment of other Employees;

we do not use our position for the purpose or in a manner that violates the personal interests of other Employees, including their dignity and good name;

we do not disseminate untrue information that violates the personal rights of other Employees;

we do not take credit for the achievements and successes of other Company employees;

we avoid conflicts of interest (or situations that may appear to other Employees to be such) in the recruitment of family members or friends, in particular the involvement of family members in the recruitment process and situations where family members would be their direct superiors or subordinates;

we do not undertake any additional activity that could adversely affect the ability to perform our duties for DOZ, the reputation of the company or otherwise conflict with the interests of the company;

we strictly adhere to the health and safety rules applicable to our jobs and respond to all perceived situations where other Employees fail to observe health and safety rules or pose a risk to their own or others' health and life;

we respond to and actively challenge any perceived forms of harassment, discrimination and bullying;

we do not work under the influence of alcohol, drugs or other intoxicants and we do not smoke on company premises;

we never retaliate against individuals who report suspected violations of the DOZ Code of Ethics.

As DOZ Employees

We work together for trust



We recognise that the quality of DOZ's relationships with healthcare partners directly impacts the health and safety of Patients. We therefore select our partners carefully and have high expectations of the quality of cooperation with our partners and the value this brings to the company; we also have high expectations of ourselves.

Our ambition is to build lasting relationships with our business partners. Trust in the company is built in particular through honesty and transparency in relationships, high quality of products and services provided, professionalism in operations, mutual respect and orientation towards mutual benefits. At the same time, we do not tolerate behaviour and attitudes that may adversely affect the working atmosphere and relations between Employees.

we deal with our partners in a fair and transparent manner, and in our mutual contacts demonstrate personal culture, respect and high standards of professionalism, regardless of the scope, intensity and area of cooperation, including: we respond to correspondence and telephone contact without undue delay, and deal with any complaints from partners and customers in a businesslike and efficient manner, in accordance with the company's internal procedures;

we honour our commitments (both written and oral declarations) and make promises only to the extent of our ability to fulfil them;

we refrain from discriminatory actions against business partners, e.g. on grounds of nationality, country of origin, religion, market position, etc;

we inform partners of the objective criteria on which decisions concerning them are based, particularly with regard to aspects relating to the establishment, progress or termination of cooperation;

we do not take actions that would unduly endanger the good reputation of partners and we refrain from disseminating information about competitors that could endanger their reputation;

we do not share with third parties or make unlawful use of confidential information obtained in the course of our mutual cooperation;

we do not unlawfully obtain information regarding business partners and competitors by misrepresenting or concealing the fact that we are representing the company when it is likely that the information would not otherwise be made available;

we do not encourage Employees who were previously employed by competitors or partners to disclose confidential information obtained at that time;

we conduct our business with external parties in the best interests of the company and, in particular, avoid any activities that could lead to conflicts of interest, such as transactions involving ourselves, our family or companies in which we have an interest or with which we have a business relationship;

actual or suspected conflict of interest, we immediately inform our supervisor;

we ensure that any action taken to advertise our activities takes into account the applicable legal regulations, does not infringe on the rights of third parties and, in particular, respects the principle of fair competition.

As DOZ Employees



We care about the value of the company



An essential part of building DOZ's sustainable value is the ongoing protection of corporate assets, including intangible assets related to the company's reputation, information held or intellectual property.

DOZ implements and continuously improves solutions and tools to ensure the protection of its tangible and intangible assets and to minimise the risk of loss of value resulting from their potential violation.



we are always guided by the well-being of the Company, protect the Company's reputation and promote its core values;

We never disseminate negative information about the Company or its activities;

we always react to any perceived situation that could negatively affect DOZ's reputation, threaten its interests or key values (e.g. we try to resolve the problem personally, report the matter to a superior or to the Ethics Committee);

we strictly adhere to the principle that providing information on the company and its activities to the media, contractors or other members of the public is the responsibility of the Pelion S.A. Spokesperson or the Pelion S.A. Press Office. We report and redirect all requests for information on the company's finances and operations or press statements to this section. This principle also applies to informal requests for information;

we actively protect the company's intellectual property and use it in a responsible manner;

we are responsible for the proper use of confidential information relating to DOZ, we never disclose such information to third parties without first concluding an appropriate confidentiality agreement and we are particularly careful when using IT systems and data carriers containing such information;

we consult the Legal team on any concerns regarding the use of intellectual property rights and confidential information;

we protect all data relating to the Com-

pany's business (stored in any form and on any medium) to which we have physical or electronic access from unauthorised access, including protecting our passwords to access systems, and we secure all sensitive data in accordance with our information security procedure;

we are particularly protective of the personal data provided to us by our Patients at DOZ Apteki dbam o zdrowie, Employees and Job Candidates in accordance with the law and the information security procedure and personal data security manual in the recruitment process;

we respect the intellectual property rights of third parties and the confidential information of external parties, providing them with protection comparable to that of DOZ;

we protect company premises, equipment and facilities from loss, theft, damage or misuse;

we do not use company property for personal gain; we use company equipment and resources for business purposes only, unless otherwise permitted by company procedures;

we demonstrate a high level of personal culture both in personal dealings with and in the presence of our patients, business partners and colleagues.

As DOZ Employees

We protect free competition



As a company with a strong market position, DOZ has a preventive policy in relation to potential risks of abuse of competitive position and practices that may violate the principles of free competition. The fact that we operate in a sensitive healthcare market and largely at the interface between the private and public sectors also requires us to be proactive in countering corruption.



we apply the principles of fair competition to both competitors and domestic and foreign contractors;

in the process of selecting partners, we are guided exclusively by merit considerations, including the company's credibility, reputation, economic situation and the quality and competitiveness of the offer presented, as well as sustainability issues (both in relation to the entity's activities and the consequences of potential cooperation, e.g. the distances over which medicinal products and other assortment will be transported); we ensure that, if necessary, we are able to present fair and objective criteria that determined the choice of partner and the scope of cooperation;

We do not initiate, engage in or participate in anti-competitive activities in the market such as market-sharing agreements, agreements concerning customers, price levels, boycotts of selected suppliers or customers, etc.; we do not share or exchange information with representatives of competitors that may influence their prices, discounts, pricing policies, etc.; we inform our supervisor without delay of any contacts made by external parties (competitors, business partners or other entities) that have the purpose or may have the effect of restricting competition;

we avoid situations that might give rise to suspicion of using covert forms of bribery;

gifts from third parties are accepted only if they are customary in form and do not give rise to doubt as to their symbolic nature;

we are never directly or indirectly involved in any acts of corruption, regardless of the practices and customs accepted in the relevant market: we do not accept or expect bribes or other unfair advantages; we do not offer or promise - including through others - undue financial or non-financial benefits in exchange for administrative or business decisions of third parties in the public or private sector that may affect the company's operations; we actively oppose bribery, and we report immediately to our superior any case of requesting an unauthorised financial advantage from them;

we always and immediately inform our supervisor if we are invited to participate in business meetings, competitions and gifts given by contractors, even if they are customary and symbolic in nature;

we accept or offer invitations to attend business meetings (e.g., training, meals or entertainment) only with the approval of the supervisor, to the extent that, for the nature of the business relationship, they are consistent with generally accepted standards of hospitality and do not jeopardize the good reputation of the company when publicly assessed;

we do not give gifts to representatives of business partners or public institutions other than those that are symbolic and customary in the relevant market or that could be considered by them as inappropriate or given in bad faith; we never accept or give gifts in the form of money or a loan (regardless of amount).

As DOZ Employees

We create a better reality



By combining a willingness to engage in solving social problems with the assumption that its leading area should be the one in which the company is most competent and can act most effectively, DOZ is using its potential to proactively address healthcare challenges.

It engages and enables its Employees to engage in activities that serve the community in which it operates, including, in particular, those related to breaking down barriers to accessing pharmacotherapy for vulnerable people and promoting preventive health care. The DOZ Foundation plays a leading role in the implementation of the above projects.

As DOZ Employees

we engage and encourage others to engage in social initiatives and activities of non-governmental organizations, including in particular the activities of the DOZ Foundation and the DOZ Łódź Marathon to the extent that this does not interfere with the proper performance of our daily duties at the company and does not constitute a conflict of interest;

we value community involvement as an expression of a responsible attitude, a source of experience and an opportunity to develop personal and professional competences;

we do not pressure our Associates or members of our subordinate Teams into involvement with any charitable, religious or political organisation;

In business relations, we actively promote social engagement projects undertaken by DOZ and its related entities, in particular the DOZ Foundation;

we do not criticise the choices of our Associates and subordinate Team members relating to their involvement in community activities, including those of charitable, religious or political organisations;

we do not criticise DOZ's social engagement projects in our business relations, and in the event of such criticism in our non-professional relations we always inform that it is our private opinion; if we have any objections to social activities carried out by the company, we can fearlessly report them to the Ethics Committee.

We care about the environment



DOZ accepts responsibility for its environmental impact. In line with its environmental policy, the company implements a preventive approach to its protection, focusing attention on reducing its negative impact in its daily activities. At the same time, it considers respect for the principles of sustainability as one of the key conditions for the sustainable development of an organisation.

we strictly apply and expand our knowledge of applicable environmental laws and regulations relevant to the scope of our professional duties.

we ensure the efficient use of energy, water, paper and other consumables or raw materials used at the workplace;

we are actively looking for ways to minimise the negative impact of DOZ's activities on the environment and submit our ideas to the email address: ekoapteka@doz.pl;

we promote the company's environmental policy, including adopting environmental impact issues (of the company in question and of the processes involved in using its services and products) as one of the criteria they consider in selecting suppliers;

we actively seek organisational solutions within the company to increase the efficiency of energy and raw material use and to reduce the amount and nuisance of waste and pollution generated;

we separate waste at the workplace, including the collection of recyclable materials;

we ensure that medicinal products are disposed of in accordance with current legislation;

using the company car fleet, we drive economically and responsibly towards other road users and improve our eco-driving skills as much as possible;

we shall immediately inform our supervisor of any identified or potential environmental hazards and cases of non-compliance of our activities with environmental regulations.

As DOZ Employees

Reporting of Code violations

Each Employee is responsible for complying with all laws and the rules of this Code and undertakes to respond to behaviour that violates the company's rules of conduct.

Behaviour that bears the hallmarks of unethical, unlawful or incompatible behaviour must be reported through the available communication channels.

If there are problems that can be solved within the Team, it is worth taking action on your own to rectify them.

Reporting should be done in good faith. An employee who raises a concern in good faith and makes a mistake need not fear negative consequences for his or her behaviour. In the case of intentional false information, the Company will take appropriate action against the Employee.

Submitters may disclose their personal data, but this is not necessary, submissions may be anonymous. The reporting person's data is protected and will only be shared with case investigators.

Each report will be analysed in terms of the seriousness and reasonableness of the necessary action, so the reporter should provide accurate and precise information that will help identify the cause of the problem and take the necessary action to resolve the issue.

The employee may raise his/her concerns directly with his/her supervisor, the Ethics Committee and the DOZ S.A. HR Department.

If you wish to remain anonymous, you can use one of the available internal communication channels:



Any Employee reporting abuse is afforded full discretion by the organisation.

It is strictly forbidden for other members of the Team to exert psychological or physical pressure on Employees who have reported a violation. In the event of retaliation by any person, regardless of their position, the company will draw the appropriate consequences.

Each report will be thoroughly analysed and, once the cause of the problem has been identified, the necessary corrective action will be taken.

An Ethics Committee has been set up to deal with any reports of ethical concerns, which has between three and five members and is headed by a chairman. The Commission operates on the basis of its Rules of Procedure and its main tasks are:

- supporting Employees in complying with the Code of Ethics;
- **conducting educational campaigns to familiarise Employees with the principles of the Code;**
- updating the content of the Code;
- resolving ethical dilemmas raised by Employees;
- **issuing guidelines of a general nature on the interpretation of the Code.**

Diagram of the ethical decision-making process

The following model, along with guiding questions, is intended to help resolve ethical dilemmas.



1

Define an ethical dilemma

Consider whether this is really a dilemma and what it is based on?

What are the facts that support its existence?

Who is affected?

Look for regulations or procedures

Is there information in the Code of Ethics to guide you?

Are there any general principles that can help to resolve the matter?

2



3

Make a decision and assess the consequences

What might be the consequences of your decision for individuals such as co-workers, patients, or business partners?



Contact others for advice

4

Talk to your supervisor, the DOZ S.A. HR Department or a representative of the Ethics Committee for information on how to proceed.



5

Make a decision and assess the consequences

What decision have you made?

What impact has it had?



Questions and answers

Questions and answers will be periodically updated and supplemented based on emerging ethical dilemmas.

I have just been employed for a trial period at DOZ S.A.. For now, I spend my time at work getting to know the organisation and the rules here, attending training sessions. Am I already bound by the Code of Ethics?

Yes. Each Employee, regardless of his or her position, seniority or form of contract, is obliged to comply with the principles adopted by the organisation in the performance of his or her duties and in his or her private life, if decisions and actions taken could have negative consequences for DOZ S.A. The Code applies from the first day of work, without exception in any situation related to the operation of the company.

What could be the consequences of not complying with the principles enshrined in the Code of Ethics?

The consequences of failing to comply with the principles of conduct enshrined in the Code can affect the Employee himself, as well as the organisation and its Patients and Contractors. Depending on the scale of the undesirable or illegal action, they can be financial (such as fines, higher costs, financial losses, reduction in the value of the company), legal (prosecution), image and environmental. The nature and severity of the consequences for the Employee will be determined by the immediate supervisor, based on the opinion received from the Ethics Committee and the provisions of the Work Regulations and relevant legislation, as well as the attitude of the person who has committed a breach of the Code.

There are examples of provisions in the Code of Ethics that, in practice, do not apply to the scope of my duties. Do I need to read them in detail?

Yes. The rules of conduct apply to all Employees, irrespective of their job description or place of work in the Group's organisational structure. Even if some of the principles set out in the Code do not correspond to the specifics of a particular job, this does not relieve the employee from the obligation to react or report violations of the Code in the event of such a situation, e.g. in relation to employees from other departments or DOZ companies.

I manage a team of several people. Will the implementation of the Code mean additional responsibilities for me?

Yes. The Code places particular responsibility on supervisors to apply our ethical principles to themselves as well as to members of their subordinate Team. It is also the responsibility of management to inform Employees of the company's policies and to respond immediately if there is any deviation in their application. At the same time, superiors should provide assistance in clarifying doubts reported to them concerning interpretation of the Code or cases of violation of its provisions, either by explaining the case personally or by helping to obtain an opinion from the Ethics Committee or a representative of another organisational unit of DOZ S.A.. Each time, however, the matter should be explained in a way that encourages Employees to decide to approach their supervisor again with their next problem.

I work in marketing. I feel that my day-to-day duties do not require detailed knowledge of the laws governing pharmaceutical information. Should I add to my knowledge in this area?

Yes. Every Employee, irrespective of his or her position, is obliged to know and apply the applicable legislation insofar as it relates to his or her activities and responsibilities. If there is any doubt as to the scope of the regulations with which he or she absolutely must comply, he or she should report to his or her immediate supervisor or the DOZ legal department to request such information.

I work with one of the DOZ companies under a contract of mandate. Am I also bound by the Code of Ethics?

Yes, the Code of Ethics applies to all persons employed and cooperating with DOZ S.A., as well as all companies in the DOZ Group, regardless of their position, seniority, type and form of contract, full-time position and scope of responsibility. Also those who work with us under contracts other than an employment contract should know and apply the Code of Ethics.

What should be done when ethical concerns arise from areas that are not covered by the Code of Ethics?

If questions or concerns arise in relation to issues that are not covered by the Code of Ethics, please contact your supervisor or directly the Ethics Committee, DOZ S.A. HR Department. Perhaps reporting such a case, in addition to answering an employee's question, will also be a good opportunity to add new aspects to the Code - it is not a closed set of rules and the company plans to subject it to continuous improvement.

A colleague of mine is a journalist for one of the business magazines. I was recently asked to comment on labour relations in our company. Can I give him an interview?

No. Any attempt to contact a journalist from any editorial office should be reported to a supervisor who will refer the subject to the Pelion S.A. Press Officer or the Pelion S.A. Press Office, - the only unit competent to deal with media contacts. Misrepresentation of company information can expose the company to reputational damage and carry the risk of disclosure of confidential information.

My supervisor has been behaving ambiguously towards me for a long time - making inappropriate suggestions and comments that make me feel uncomfortable in his presence. I made an attempt to clarify the matter and stipulated that I did not wish him to put me in such a situation again. He downplayed the subject and his behaviour did not change. What should my reaction be?

The described behaviour of the supervisor is unacceptable and this type of attitude - as violating the rights of the Employee - is not accepted by DOZ. Any case where a supervisor violates the dignity of an Employee or takes actions that bear the hallmarks of bullying or harassment should be reported to the Ethics Committee.

I am a frequent visitor to online forums. I recently noticed a discussion on one of them regarding employment at DOZ. Some of the posts were very unflattering. As a DOZ Employee, should I personally intervene?

No. Any situation threatening the image of DOZ S.A. should be reported to the supervisor or the HR Department of DOZ S.A., who are responsible for agreeing with the Management Board and implementing actions related to the protection of the company's reputation.

One of the Co-workers is notoriously unflattering about the skills and competence of the women of the Team without any factual basis. What should my reaction be?

Whenever a situation arises in which a person is discriminated against on the basis of gender, age, religion, sexual orientation, place of residence, etc., the immediate supervisor or the Ethics Committee must be informed.

A colleague of mine made an inappropriate proposal to me during a training trip. I ignored the situation making it clear that I was not interested in her. We have not returned to the subject. Should I report his behaviour to the Ethics Committee?

Situations where the Employee's personal dignity is violated should never occur. However, we encourage that if they are incidental, attempts should be made to resolve them in-house in the first instance. If the situation recurs or the Employee does not feel able to face it on his/her own, it should be reported to the supervisor or the Ethics Committee.

I stayed at work for a few minutes longer recently to get my paperwork in order in peace, and then I got a call from a contractor with an urgent request to prepare some information for now. I know it would have taken me about an hour, and I already had other non-service commitments. There were no longer any of my colleagues in the office whom I could ask for help. What should I have done in this situation?

Our priority is to provide an efficient and professional service to our patients and contractors. In this situation, it would be best to inform the contractor that the working day is over and ensure that the information they need is prepared as soon as possible - making sure that this is convenient for them. In the event that the counterparty nevertheless insists on a quicker resolution, contact your immediate supervisor asking for assistance in finding the best solution.

I was recently buying medicines at one of our DOZ Pharmacies I care about health and witnessed a situation where the Pharmacist did not give an elderly person comprehensive - in my opinion - answers to the questions she asked about the use of the medicine. There was a lot of traffic in the Pharmacy at the time, however, I believe that this was not sufficient justification. How should I have reacted?

In our company, the patient is always at the centre of attention, this is our mission, but also the meaning of our work. One of our priorities in this area is to ensure the highest standards of pharmaceutical care provided, including its accessibility and full patient information. The situation cited is in direct conflict with the company's recognised core values and should be communicated immediately to the supervisor or the Ethics Committee.

While visiting one of our DOZ Pharmacies I care for Health recently as part of a cyclical 'Day at the Pharmacy', I noticed that our patients' prescriptions are not properly secured and stored. What should I do?

The security of our patients' personal information is a priority for us. All data provided to us by Patients should be secured in accordance with applicable law and internal procedures. Any such incidents should be reported immediately to your supervisor and to the Data Security Officer.

I am concerned about a situation where a colleague extends her breaks by going outside the building for a cigarette and extending her meal breaks. The entire team must thus wait for her return before carrying out further tasks. What can I do in this situation?

In accordance with the Work Regulations, there is a total ban on smoking on company premises. Unless an attempt to talk to a colleague about changing her existing habits results in an immediate change in attitude, the matter should be reported to her immediate supervisor or the Ethics Committee.

My colleague has already turned up at work under the influence of alcohol on several occasions. I know he has family problems and I wouldn't want to hurt him more, but his repeated indisposition negatively affects the work of our department. What should I do?

Joining work under the influence of alcohol, drugs or other intoxicants is not acceptable. It is imperative that such a situation be reported to your immediate superior or to the Ethics Committee, bearing in mind, however, the principles of comradeship and good social intercourse, and therefore the need for the utmost discretion.

I get the impression that the supervisor is deliberately making it impossible for one of my colleagues to reconcile her work and private life - he assigns her tasks that are beyond the capacity of a single employee and generally just before the end of her working day with the information that it is an extremely urgent matter. As a consequence, the colleague is unable to cope with all her duties during core working hours, causing her the additional stress of neglecting her family responsibilities. Can I respond in any way?

The situation described may bear the hallmarks of bullying, which is an unacceptable phenomenon in a corporate work environment. Suspected bullying must be reported immediately to the Ethics Committee. **I learned from our contractor about the possibility of acquiring a stake in a certain company that manufactures medicines. As an Employee of DOZ S.A., can I buy shares in a company that is our supplier?**

Such a situation gives rise to a potential conflict of interest especially when the decisions taken may affect the operation of the company. In such a situation, the first thing to do is to ask your supervisor and DOZ's legal department for a clear interpretation and analysis of the situation.

My sister works at a marketing agency. I would like her company to do a leaflet design for my department especially as she has provided a competitive quote. Is this possible?

Such a situation raises the risk of a conflict of interest, particularly if a family member has influence over the terms of the contract. Whenever a potential subcontractor has a family relationship with an Employee that may affect his or her employment by DOZ S.A., the supervisor must be notified - he or she will decide whether cooperation will be possible and, if so, will appoint a person responsible for all cooperation with such a contractor. In no case can a family member be responsible for cooperation.

I recruit Employees. We were recently approached by a candidate who introduced himself as a former Employee of a competing company. In the conversation, he suggested the possibility of handing over a competitor's database if he was hired by the company. How should one respond to such cases?

Such documents are confidential data. There is a real possibility that the person making such a proposal is in breach not only of the terms of the contract under which he or she was employed by the previous employer, but also of the law. The company does not want to be associated with individuals who engage in unethical and illegal activities.

It has come to my attention that a representative of our direct competitor spoke very unflatteringly at a Pharmacists' meeting about the product we offer, making untrue claims. What should I do?

The situation may require the company to take swift action to protect the reputation of both our company and the products we offer. The matter should be reported immediately to the immediate supervisor or the Company's Board of Directors.

I work as an Assistant. My supervisor notoriously responds late or not at all to requests for contact made by telephone or post by colleagues or contractors. While I understand that she has many responsibilities, such behaviour is not only rude, but also negatively affects the perception of myself as a professional person, as most of these requests are channelled through me. How should I respond?

All DOZ S.A. employees in their dealings with each other and with the company's partners are expected to demonstrate high personal culture, respect and high standards of professionalism, which includes responding to correspondence and telephone contact without undue delay. The matter should be reported to the Ethics Committee unless the Employee feels able to attempt to clarify the matter by speaking directly to the Code violator.

To celebrate a successful transaction, the contractor invited me to dinner at a restaurant. The atmosphere of the meeting was very informal and, at the contractor's request, the dinner was accompanied by alcohol in excess of a symbolic glass of wine. In my opinion, however, our behaviour did not go beyond the accepted norms of manners and business standards. How, in such situations, do you compromise between concern for your company's image and good customer relations without being accused of using excessive hospitality?

Accepting an invitation to participate in meals or entertainment insofar as they correspond to generally accepted standards for the nature of the business relationship is common practice and does not, in principle, raise ethical questions. However, it is important to ensure that the behaviour of the Employee representing DOZ S.A. is within the bounds of good morals and, if subjected to public scrutiny, does not constitute a threat to the company's reputation.

I work in the controlling department. I have the opportunity to take on additional work where I would use the same competences I use in our company. The Employer is not a competitor of the company, it operates in a different industry.

The employee shall be entitled to engage in additional activities that are not of a competitive nature, including, in particular, teaching, scientific, journalistic, charitable activities, if the nature of these activities or their size does not impede the proper performance of duties at the DOZ. However, the Employee shall inform the supervisor in writing of the activity in question.

One of our Suppliers, with whom we have an ongoing relationship, invited me to participate in a competition they are organising. The prize in the competition is an overseas trip of considerable value. As this competition is organised for everyone in my opinion I can take part and then benefit from winning.

DOZ employees may participate in competitions organised in connection with their duties only with the knowledge and consent of their supervisor. DOZ employees also do not accept gifts, prizes other than customary gifts of small value on the grounds that this may give rise to suspicions of attempted bribery.

A colleague from Pharmacy took up additional employment after working hours in our company. Since then, he has notoriously come to work tired and sleep-deprived, 23)raising concerns that reduced concentration could lead to a safety risk or error. How should I behave?

The physical indisposition of a Pharmacy Worker can have a direct impact on both the safety of Co-workers and the storage and packaging of medicinal products and therefore the health of the Patient. The situation should be brought to the attention of the supervisor or the Ethics Committee.

I have a work laptop at my disposal, which I often take home. Can I install games on it for my child?

No. Company-provided equipment may be taken home with the approval of the supervisor and used exclusively for business purposes, subject to the relevant internal regulations, according to which it is not permitted to install software on company equipment other than that provided by the company.

A patient approached me for advice on his treatment. What should I base my decision on?

As a Pharmacist, you have a duty to provide the Patient with accurate, complete and understandable information about medicines and medical devices, based on your knowledge and professional background.



PATIENT

AT THE CENTRE OF ATTENTION

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