WAM PHARMA LTD

EMPLOYEE CODE OF CONDUCT POLICY MANUAL



Policy brief & purpose

Our **Employee Code of Conduct company policy** outlines our expectations regarding employees' behavior towards their colleagues, supervisors and overall organization.

We promote freedom of expression and open communication however; we expect all employees to follow our code of conduct. WAM PHARMA employees should avoid offending, participating in serious disputes and engaging in any activities that disrupting our workplace. We also expect staff to foster a well-organized, respectful and collaborative environment.

Scope

This policy applies to all WAM PHARMA employees regardless of employment agreement or rank.

Policy elements

WAM PHARMA employees are bound by their contract to follow our Employee Code of Conduct while performing their duties. We outline the components of our Code of Conduct below:

Compliance with law

All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

Respect in the workplace

All employees should respect their colleagues. We do not allow or tolerate any kind of discriminatory behavior, harassment or victimization. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

EEO Policy brief & purpose

Our equal opportunity employer policy reflects our commitment to ensure equality and promote diversity in the workplace. This equal employment opportunity policy is the pillar of a healthy and productive workplace. All WAM PHARMA staff should feel supported and valued to work productively so we are invested in treating everyone with respect and consideration.

Scope

Our equal opportunity employer policy applies to all employees, job candidates, contractors, stakeholders, partners and visitors.

Equal opportunity is for everyone, but it mainly concerns members of underrepresented groups – they are the ones who are traditionally disadvantaged in the workplace. We do not guarantee employment or promotions for people in those groups, but we will treat them fairly and avoid discriminating against them either via conscious or unconscious biases.

Policy elements

Being an equal opportunity employer means that we provide the same opportunities for hiring, advancement and benefits to everyone without discriminating due to protected characteristics like:

- Age
- Sex / Gender
- Sexual orientation



- Ethnicity/ Nationality
- Religion
- Disability
- Medical history

What is an EEO policy?

We built our equal employment opportunity policy around preventive and affirmative actions to ensure fairness in all aspects of employment. These aspects include:

- Hiring
- Training
- Evaluating performance
- Administering compensation and benefits
- Terminating employees

We also want to make sure that equal opportunity applies to other instances. For example, we do not retaliate against employees and we are committed to prevent and resolve any kind of harassment against our employees, including sexual harassment.

Our HR department is responsible for assessing our company's processes and ensuring they are bias-free. Whenever we find biases interfering, we will act immediately to refine our processes, train our people to combat their biases and protect possible victims of discrimination. We will give everyone the chance to work in an environment where their rights are respected.

Actions

To promote equal opportunity, we first ensure we follow EEO laws that apply to our company.

We will also take additional actions to promote fairness and diversity as part of our equal employment opportunity policy. We will:

- [*Use inclusive language in all signs, documents and webpages.*]
- [Modify structures and facilities to accommodate people with disabilities.]
- [Provide parental leave and flexible work arrangement policies.]
- [Hire, train and evaluate employees through job-related criteria.]
- [Allow employees to take religious or national holidays that aren't included in our company's official schedule.]
- [Train employees on communication and diversity.]
- [Implement open door practices so employees can report discrimination more easily.]

Grievance Procedure

All supervisors and managers are responsible to use equal opportunity practices and make decisions based on objective, non-discriminatory criteria. Everyone should comply with our policy at all times.

If you see or suspect that our EEO policies are being violated, feel free to inform HR immediately. If you suspect that someone is behaving in a wrong way but does not realize it, you could also talk to them directly.

Disciplinary Consequences

When someone discriminates, they will be subject to disciplinary action depending on the severity of their actions. For example, unintentionally offending a coworker might warrant a reprimand, but harassing someone systematically might result in demotion or termination.



Protection of Company Property

All employees should treat WAM PHARMA's company property, whether material, intangible or incorporeal with respect and care. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.

Employees should protect company facilities and other material property (e.g., <u>company cars</u>) from damage and vandalism, whenever possible.

Professionalism

All employees demonstrate integrity and professionalism in the workplace at all times.

Personal appearance

All employees must follow our dress code and personal appearance guidelines. Our company's official dress code is [Business/Business Casual/Smart Casual]

We may change our dress code in special cases. For example, we may require employees to wear semi-formal attire for an event. Then, both male and female employees should wear suits, ties, white shirts and appropriate shoes. Our company may also introduce [dress-down Friday] when employees can wear more casual clothing like jeans, simple blouses and boots. This will not apply if employees are meeting with clients, partners and other external parties.

Corruption

We discourage employees from accepting gifts from clients or partners. We prohibit briberies for the benefit of any external or internal party.

Job duties and authority

All employees should fulfill their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers mustn't abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and

Absenteeism and tardiness

Employees should follow their schedules. We can make exceptions for occasions that prevent employees from following standard working hours or days. But generally, we expect employees to be punctual when coming to and leaving from work.

Unforeseen absences

We will understand if you have good reasons for being absent, even if you do not report it. Those reasons usually involve serious accidents and family or acute medical emergencies. We may ask you to bring us doctor's notes or other verification. In these cases, we will record your absence as "excused."

The following list, although not exhaustive, includes reasons that we don't consider excused absence:

- Waking up late.
- Stopping on the way to work for personal reasons.
- Traffic or public transportation delays excluding situations that result in closing of roads.
- Bad weather, excluding extreme weather conditions like blizzards, hurricanes and floods.
- Holidays that haven't been approved.



Disciplinary action

If your manager suspects you abuse your sick leave, you may need to submit doctor's notes to avoid our progressive discipline process. If you're being tardy unintentionally, corrective counseling will be our first attempt at a solution. We may take disciplinary action that goes up to and including termination if:

- Corrective counseling doesn't work.
- We find that you are willfully tardy.
- Your tardiness or absenteeism impacts your work.

Unexcused and unreported absences don't count as hours worked, so we won't compensate them.

Conflict of interest

We expect employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties.

Collaboration

Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

Communication

All employees must be open for communication with their colleagues, supervisors or team members.

Benefits

We expect employees to not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits our company offers.

Policies

All employees should read and follow our company policies. If they have any questions, they should ask their managers or Human Resources (HR) department.

Disciplinary actions

WAM PHARMA may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include:

- Demotion.
- Reprimand.
- Suspension or termination for more serious offenses.
- Detraction of benefits for a definite or indefinite time.

We may take legal action in cases of corruption, theft, embezzlement or other unlawful behavior.