



CONSEIL - STRATÉGIE - DÉVELOPPEMENT

Code of Conduct & Ethics

November 2019

TABLE OF CONTENT

Purpose and scope of the Code of Conduct and Ethics	3
1. Compliance with laws, standards and recommendations	4
2. Health and security in the work environment	4
3. Non-discrimination and non-harassment policy	5
4. Child labour	5
5. Forced labour and trafficking	6
6. Freedom of speech.....	6
7. Conflict of interest.....	6
8. Fair competition and fair business practices	7
9. Insider trading.....	8
10. Anti-corruption and anti-bribery policy	8
11. Protection of personal and confidential data	9
12. Financial transparency	10
13. Environment	10
Questions.....	10

Purpose and scope of the Code of Conduct and Ethics

This Code of Conduct and Ethics (the ‘Code’) adopted by CS Développement (‘CSD’) reflects our commitment to conduct our business in accordance with the highest ethical standards.

It summarizes standards that affect all CSD employees, consultants and partners to ensure their actions on behalf of the company are honest, ethical and legitimate and sets clear expectations for ourselves and others regarding the appropriate standards of business conduct.

The company expects its suppliers and other representatives to abide by this Code when acting on behalf of the company. The Code also extends to our community of consumers, customers and businesses, and to anyone doing business with us. Not only does CSD ensure that the business is conducted ethically, it also works to ensure that such is occurs in its supply chains. It is a condition of all customer, supply and vendor contracts entered into with CSD that the principles set out in this Code are adhered to.

This Code covers a wide range of business practices and procedures. It does not cover every problem that may arise, but it sets out basic principle to guide all employees, consultants and partners.

A Code of conduct training will be conducted on a yearly basis for each employee and any new hired within the first month in the company. This Code is given to each newly hired person. It applies to all permanent and temporary staff of the company - all CSD employees and the people who work for the company must read, sign and follow this Code. This document is an integrated part of all CSD employment agreements.

Anyone working at CSD or carrying out an activity on behalf of CSD must:

- Work with respect for honesty and integrity;
- Know and comply with all laws, regulations and procedures related to the activity;
- Maintain a climate of mutual respect within the work environment;
- Report any violation of ethical rules witnessed.

We review and update the Code and our policies on an ongoing basis. We reserve the right to amend this Code of Ethics at any time, for any reason, subject to applicable law.

Everyone covered by the Code of Conduct & Ethics is expected to read, understand and follow it - noncompliance can have serious consequences.

1. Compliance with laws, standards and recommendations

CSD provides a wide range of services to its customers in a highly regulated environment and must comply with laws, rules and recommendations. In the pharmaceutical sector, these rules impact:

- The interaction with health professionals;
- The interaction with health authorities;
- The interaction with patients;
- The promotion and marketing of pharmaceutical products;
- Third partners as services providers.

Many aspects of the company's activities are subject to the regulations of the Ministry of Health and Hospital Reform, Ministry of Labour and Ministry of Trade as well as similar key international regulatory bodies.

CSD must also comply with the health care laws and regulations specific to each country in which it operates.

2. Health and security in the work environment

CSD strives to provide each employee with a safe and healthy work environment. It requires its employees, consultants and partners to fully comply with the applicable health and safety standards.

Each employee is required to:

- Report any work accident occurring inside or outside of CSD during duties
- Report any equipment failure
- Report any unsafe working practice or condition
- Maintain optimal health and safety conditions on CSD's site.

3. Non-discrimination and non-harassment policy

CSD is firmly committed to providing equal opportunity to all employees in all aspects of employment and does not tolerate any discrimination in connection with recruitment, training, or promotion.

Any form of harassment against an employee because of their origin, colour, religion, sex, age, marital status, disability or any other reason is strictly prohibited. We value diversity among our employees.

CSD also condemns any form of inhuman treatment, corporal punishment, insults, moral or physical harassment.

Each employee must be extremely cautious regarding his behaviour towards his colleagues, superiors and subordinates. CSD has a zero-tolerance policy towards disrespectful conduct.

Similarly, we do not authorise and will not tolerate any form of harassment, discrimination or other inappropriate behaviour by any employee, whether supervisory or non-supervisory.

The same level of requirement is applicable to our external partners. We request our partners to respect the rights of all workers and to commit to acting lawfully and ethically in all components of their businesses.

We also expect anyone doing business with us to encourage and facilitate practices that promote equality and avoid discrimination and harassment.

4. Child labour

CSD is opposed to the use of any form of child labour or practices - customers, contractors and suppliers are required to comply with applicable child labour laws.

In addition to local laws and regulations, CSD policy condemns child labour the employment of minors under the age of 19 in all areas of the business. Forced or compulsory labour of any employee or partner is also strictly forbidden.

Some tasks accomplished by the minor may be subject to exemption for educational purposes – these tasks must not, in any way, be hazardous or have a negative impact on the minor's physical or mental development.

5. Forced labour and trafficking

Any form of forced labour is prohibited by the company. CSD's customers, contractors and suppliers must not participate, engage or promote forced or involuntary labour of people in any part of its business.

CSD's customers, contractors and suppliers must not participate, engage or promote the trafficking of any person.

Each employee can leave the employer freely at any time, subject to legal notice. Customers, contractors and suppliers are to ensure that all workers employed by them chose their employment freely and are not mentally or physically forced to provide their labour.

The detention of identity documents, passport, training certificate, work permit or any other document is strictly prohibited.

6. Freedom of speech

All employees can communicate freely with their hierarchy about their working conditions, remuneration or any other subject when required and needed, without fear of reprisals, intimidation or harassment.

Any improvement proposal is welcomed and must be taken into consideration and dealt with by the parties concerned. The outcome (approval or refusal) must be communicated to the applicant.

Line supervisors and managers must be attentive to their employees, suggest solutions or give explanations when necessary.

7. Conflict of interest

A conflict of interest arises when an individual or an organisation is involved in multiple interests, at least one of which could corrupt the motivation to act on the others.

A conflict of interest appears in a person whose personal interests - whether financial, civic, social or other, are in competition with the tasks assigned to him by his management.

CSD commits to ensure that any decision made by its employees and partners is solely based on the performance and quality of the products and services offered, and not on any form of hidden advantage or conflict of interest.

No employee, consultant or partner of CSD may have any direct or indirect conflict of interest in the exercise of their professional activities.

Any situation likely to represent a conflict of interest, which could affect the performance of the tasks assigned to CSD, must be reported, investigated and clarified.

8. Fair competition and fair business practices

The company policy aims to comply with the local competition law along with the international unfair competition and antitrust laws. Unfair competition laws prohibit companies from engaging in certain activities that could limit competition or restrict trade.

Any action aimed at disturbing the image and reputation of the business, products or services of another entrepreneur, corruption, backbiting, false advertising or the violation of trade secrets, is strictly prohibited.

Employees cannot communicate with, or enter into agreements with competitors regarding confidential information, such as pricing practices, marketing strategies and other plans strategic.

Theft of data, possession of trade secret information obtained without the owner's consent, or persuasion of current or former employees of other companies to disclose such information are strictly prohibited by CSD.

Each employee, administrator and partner should strive to respect the rights of customers, suppliers, competitors and employees of the company and to have fair business practices with them.

No employee, manager or partner should unfairly take advantage from anyone by manipulation, concealment, misuse of privileged information, misrepresentation or any other unfair commercial practice.

9. Insider trading

An employee who knows important company information that has not been released to the public must keep this information confidential. Employees cannot buy or sell another company's data using non-public information obtained during their duties, or to provide this information to others.

Employees cannot use or allocate company funds or assets to a political party, candidate or campaign, unless this is accepted practice and is legal in the country in which the company operates. The General Manager must also approve this funding.

CSD employees must respect the trade secrets and confidential information of our partners and customers. Although information obtained from the public domain is a legitimate source of competitive information, a trade secret obtained by illicit means unlawful.

10. Anti-corruption and anti-bribery policy

CSD respects national and international laws and regulations to fight corruption in all its forms.

CSD is committed to doing business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity.

This Policy applies to all CSD employees, including executives, managers, officers and directors.

The company forbids any form of bribe and any form of unethical or illegal inducement towards a government official or employee. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. No employee, manager or partner of the company may offer a gift or privilege, whatever its value, to a government official within the framework of business initiatives.

Likewise, the company prohibits any employee, administrator or partner from offering or receiving gifts or giving or accepting a privilege as an incentive to a particular action, transaction or advantage or result. Any gift, which compels the recipient to act in a particular manner in relation to the activities of the business, is a bribe and should not be offered or accepted.

In case of doubt, the employees are required to refer to their line manager.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, distributors, consultants, agents and any other business partner working for or on behalf of CSD. All business partners, including suppliers, distributors, consultants, agents and other business partners working for or on behalf of CSD must behave according to the principles set out in this Policy.

11. Protection of personal and confidential data

CSD is concerned about the confidentiality of the data collected, used and collected as part of its activities as a service provider.

The collection and processing of personal data by CSD is done in compliance with Algerian and international laws relating to data protection.

Personal data privacy and confidentiality are guaranteed for all our employees, partners and others stakeholders.

Without prior consent, all CSD consultants and partners are required not to disseminate any kind of data collected in the performance of their duties – which includes personal notes taken.

CSD is required to give the people involved reasons for the collection of personal data, explain their use, and mention the entities this data will be disclosed to.

Likewise, any modification or adaptation of this data requires the authorization of its owner.

If this data is used for a purpose other than the one for which it was initially collected, the people involved must be informed and their authorization obtained. This rule also applies to all documents, records and information recorded electronically.

Any deviation from this rule may result in prosecution and / or measures disciplinary.

Any disclosure of information about the employer's activities (the clientele names, the clientele's and counterparties' contacts, the types of studies conducted, the transactions' amounts, ...) may cause the company substantial commercial harm. For this reason, each one commits to observe secrecy, in the strictest way, of all the data they may have collected during the performance of their duties and / or because of its presence in the offices. This data should,

never be used for personal purposes. These requirements of discretion and professional secrecy apply during and after the collaboration with the company, for any reason.

12. Financial transparency

CSD adopts a policy of financial transparency. All the transactions are recorded and listed in accounting journals kept up to date in both electronic and paper format. An accounting balance sheet established at the end of each year.

Financial management is carried out in compliance with the local regulations in force, and is subject to financial and tax controls by the competent authorities.

13. Environment

CSD respects the environment and is committed to carrying out all of its activities in a responsible manner with the aim to preserve a clean, safe and healthy environment.

CSD is committed to continually improving its processes in order to avoid pollution, minimize waste and optimize the consumption of natural resources.

CSD encourages recycling practices, battles the waste of energy and consumable supplies and takes steps to prevent pollution and minimize the waste resulting from its activities

Questions

In case of doubt about a situation that could give rise to an ethical or legal problem, or if you are a victim or witness of a case of non-compliance with the basic rules of this code of conduct and ethics, please contact your line manager first.

If you have any questions or comments about this Code, please do not hesitate to contact the General Manager. You can send an email to t.m@csdeveloppement.net .

All questions are welcomed.