

Avacare Health

Code of Conduct

Avacare Group Policy

This Code represent the values which we strive to follow, and we all have a personal responsibility to incorporate these principles into our daily work. It is built on the foundation that we at Avacare Health will be measured against the highest possible standards of ethical business conduct.

Our commitment is to deliver world-class, affordable healthcare solutions and services by hiring great people, developing quality products, and building strong relationships with our customers. These are the foundations of our success.

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A note from Dr. Vikramkumar Naik

As a provider of healthcare products, services, and solutions we touch the lives of many people, daily.

This brings an ever-increasing responsibility to earn the trust of the people we serve, not only our customers but also our suppliers, business partners, employees and community stakeholders – a responsibility that we have been building since our founding in 1996.

Earning the trust of our stakeholders requires a concerted commitment at all levels throughout the organisation, to deliver our best work, every day

Trust is one of our most important values ... and is one of the most fragile. A single incident, a careless comment, and the trust we have worked so hard to earn can be lost in an instant.

Our Code of Conduct provides the guidance we need to operate our business responsibly, to make ethical decisions...to maintain that trust.

Our Philosophy is our guide...and our Code of Conduct our road map.

I encourage you to join the Avacare Health journey by reading this Code to guide your actions. Strive to do good in all that you do and remain true to the legacy that I envisage for this company and one that I try to live up to...every day.

“Yesterday we were good, today we are better and tomorrow we will be great”!

Speak up if you have a concern and seek guidance anytime you are unsure about the right thing to do.

I am proud of all that we have accomplished, and I am delighted to lead this business, founded on the diverse complexity of the African continent, to become a global player in the competitive, innovative and integrated healthcare space.

Together, we will continue to make a difference.



Dr. Vikramkumar Naik
Chief Executive Officer

Our philosophy

- To ensure that there is a standard approach and format to all policies, procedures and guidelines across the entire Avacare Health Group.
- We are responsible to the greater community, providing affordable, innovative, and integrated health care products, services, and solutions.
- We commit to delivering quality products and services.
- We build sound and mutually successful business relationships.
- We commit to the ongoing development of our employees providing opportunities for career growth and advancement.
- We provide an inclusive work environment where employees are valued for their individual contributions.
- We respect the value and benefits of developing a cross-cultural, diverse, and inclusive workforce, where the individual strengths and diversity of our people are embraced.
- We commit to practices that endorse equal pay for work of equal value.
- We commit to safe and healthy working conditions in all our workplaces.
- We support the health and well-being of our employees.
- Employees are encouraged to express their views, make suggestions, and raise concerns.
- We appoint highly capable leaders who actively demonstrate and commit to actions that are fair and ethical.
- We are responsible to the communities in which we operate by actively contributing to their health and wellbeing.
- We commit to introducing ESG (Environmental, Social and Governance) criteria which include the company's energy use, disposal of hazardous waste, natural resource conservation, business relationships, support to the local communities and governance ensuring accurate and transparent accounting methods, avoiding conflicts of interest and engaging in illegal practices.
- Through continuous research, development, and improvement, we will identify new products, innovative programs and holistic healthcare solutions for future developments and investments.

1. Introduction

1.1 Our Code reflects who we are ...

- It provides an overview of the policies, procedures and guidelines that drive the way we work and the work we do.
- It builds upon our shared values.
- We understand the responsibility to communicate with our business partners, consultants, distributors, co-manufacturers, suppliers, subsidiaries, and joint venture partners about our high standards of integrity.
- We count on every Avacarian, to follow our Code and make decisions that will preserve the trust that our stakeholders have placed in us.

1.2 What do we expect of you?

- We require all our employees to understand and comply with our Code of Conduct, company policies and laws that govern activities.
- We expect our people to make the right decisions, to take the right actions, regardless of where we work or the type of work we do.
- We expect our employees to be leaders and role models in their own way, regardless of their job or title.
- Our managers have additional responsibilities. We expect them to serve as a positive role model in every respect, and to help employees review, understand and apply our Code.
- Our Code applies to everyone conducting business on our behalf including our business partners and stakeholders who should also respect our values.

1.3 How should we conduct ourselves?

- It is important to use good judgment in everything you do and to ask for help if you are ever unsure of the right course of action.
- You have a responsibility to speak up if you are in a situation or are aware of a situation that may violate our Code, or a policy or the law.
- If you are ever unsure...ask yourself the following questions:
 - Q: **Will my action potentially break any laws of the country?**
 - Q: **Does my action reflect Avacare values and philosophy?**
 - Q: **Is my action good for Avacare and my colleagues?**
 - Q: **Would I be happy for everyone to know about my action?**
- If you can answer YES to all these questions, then you are probably ok to move forward. But if you are NOT SURE or answered NO, then STOP, and ask your manager for advice.

2. Our employees conduct...

- Must strive to interact with each other in accordance with Avacare values.
- Every employee is required to adhere to our Code - their behaviour should be aligned to our values.
- Is measured against business and operational targets as well as their conduct and behaviour.

2.1 Personal relationships in the work environment

- It is important to be careful about company business decisions that involve close personal relationships such as family members and close personal friends.

- To prevent conflicts of interest, employees should:
 - Disclose any conflict of interest or potential conflict of interest as soon as it is established.
 - Avoid supervising or taking part in the hiring or promotion of a family member.
 - Avoid holding a position with access to or influence over performance appraisals, salary information or other confidential information related to a family member.
- If any of these situations occur, an employee must inform their manager of the personal relationship.
- The manager will assess the situation, consult with management as needed, and may elect to transfer one of the employees to another available position where no conflict exists.

2.2 Harassment in the work environment ...

- Harassment, be it sexual, psychological, or other, exists when behaviour towards another person is offensive, and affects the person's dignity or psychological or physical well-being, that results in a harmful work environment.
- Harassment can come in the form of either repeated, hostile, or unwanted conduct, verbal comments, actions or gestures, or a single incident that results in an intimidating, hostile, degrading, humiliating or offensive working environment for the person.
- Harassment of any form is not tolerated.

2.3 Violence at work ...

- Violence includes the use of physical force that causes or could cause physical injury, or any action(s), behaviour or even verbal statement(s) that could reasonably be perceived as a threat to one's safety.
- Violence is not tolerated.
- If we are victims of, or witnesses to, discrimination, harassment, or violence in our workplace, we must promptly report it to our Manager and/or Human Resources.

3. What are your responsibilities?

- You are Avacare...so make sure your actions always reflect our values.
- Follow our Code and company policies as well as the laws and regulations of the country (or countries) where you work.
- If you see or suspect anything illegal or unethical...the Whistleblowing Line is there for your protection.
- No misdemeanour is too minor to report. Share your concerns promptly and cooperate fully and honestly in any internal investigation.
- If you are a manager, you have an even greater responsibility. You are required to lead by example and are reminded that there is no difference between what you do and what you expect from others. Create the kind of workplace where employees feel comfortable coming forward with questions and concerns, support them when they raise issues. Never retaliate against employees for sharing concerns in good faith and prevent retaliation by others.
- Be aware that anyone who violates our Code may face corrective action, up to and including termination of employment.

4. Speak up without fear ...

- We know it takes courage to come forward to share your concerns.

- We will not retaliate or permit retaliation against anyone who makes a good faith report about possible misconduct or violations or assists in an investigation of misconduct or legal violation.
- Regardless of who you contact, you can be confident that you are doing the right thing and that your concern will be handled promptly and appropriately.
- We investigate reports of misconduct thoroughly, disclosing information only to those who need it to resolve the issue.

5. Know where to go for help ...

- If you have a question, problem, or a concern, in most cases, your manager should be your first point of contact.
- Managers are usually in the best position to understand your concern and take the appropriate action.
- If you are uncomfortable speaking with your manager, or if you feel it's not being addressed appropriately, reach out to HR or another member of management or contact our Avacare Whistleblowing Hotline.
- The Avacare Health Whistleblowing Hotline is outsourced to Deloitte to ensure confidentiality. All matters raised will be brought to the attention of an Investigation Committee made up of our Non-Executive Directors and the Group Human Resource Executive.

5.1 Confidential Whistleblowing Hotline Numbers

Country	Hotline Number
Australia	1 800 633 293
Botswana	0800 600 644 (BTC) 1144 (Orange) 71 119 602 (Mascom)
Democratic Republic of the Congo (DRC)	+27 31 571 8982
India	000 800 100 4382 000 800 100 8277 (Generic Local) +91 117 127 9005 (Generic New Delhi)
Kenya	0800 722 626
Lesotho	800 22 055
Malawi	+27 31 571 8982
Mauritius	802 027 0001
Namibia	0800 003 313 (Namibia Telecoms) 081 9 1847 (MTC)
Nigeria	234 708 060 1872 (Local) 809 993 7319 (Toll-free)
Senegal	+27 31 571 8982
South Africa	0800 007 821
Swaziland	800 7006

Tanzania	800 780 026
United Arab Emirates	8000 3570 3346
United States of America	1 866 317 7033
Zambia	260 971 23125
Zanzibar	+27 31 571 8982
Zimbabwe	+27 31 571 8982

6. We promote an ethical workplace and celebrate diversity and inclusion ...

6.1 Respect other people ...

- We are one team, but we represent many ideas, experiences, and backgrounds.
- Value everyone's contributions and believe that everyone should have an equal chance to succeed...this is essential to advancing our goals and initiatives.
- Do your part to keep our workplace diverse, inclusive, and respectful by recognising the many strengths and talents our diverse colleagues bring to the workplace.
- Treat others the way you would like to be treated.
- Celebrate the unique diversity of your colleagues and listen and be receptive to different points of view.
- Speak up if you see or suspect discrimination or harassment based on someone's race, colour, gender, national origin, age, religion, disability, medical condition, sexual orientation, gender identity, marital status or any other characteristic protected by law.
- Promote a work environment free of harassment, bullying and abusive conduct whether physical, verbal, or visual.
- Share any concerns you may have, knowing that Avacare does not tolerate retaliation against anyone who reports in good faith.

6.2 Promote a safe and healthy work environment ...

- We value the safety and health of every employee and we look out for each other.
- We follow our safety procedures and promote a culture of safety.
- Every employee should take immediate action for the safety of other's regardless of their role, title, or responsibility. If you see a situation that could put others at risk, act to ensure you keep yourself and your colleagues, safe and injury-free.
- Observe a policy of zero-tolerance when it comes to acts or threats of violence.
- Be alert to what is going on around you, observe good health and safe work practices and speak if there are any threats of work-place bullying or potential violence.
- Possessing, consuming, or distributing alcohol or illegal substances is prohibited.
- Substance abuse impairs your judgment, your performance, and the safety of those who work with you.
- Observe all company policies on Alcohol and Substance Abuse including Cannabis.
- There may be instances where drinking alcoholic beverages while conducting company business is permitted, but make sure you comply with the local laws, company policies and principles, always exercising both moderation and good judgment.

6.3 Uphold human rights ...

- We are committed to fair employment practices, respect the rights of every individual and abide by the employment laws in the markets where we operate.
- We support the principles established under the United Nations Universal Declaration of Human Rights.
- We do not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labour), physical punishment, forced or prison labour or human trafficking.
- We expect and will always treat others with respect, dignity and will never engage in human rights abuse or conduct business with those who do.
- We expect our suppliers to share our commitment to the same high standards.

7. Our responsibility to others

7.1 Preserve product, service quality and safety ...

- When it comes to our products and services, we will never compromise on quality.
- We strive to preserve our consumers' trust.
- Our philosophy states that everything we do must be of high-quality standards.
- This commitment to aspire to the highest standards and levels of integrity, means we will comply with all laws, clinical and ethical standards, health and safety regulations, world-wide that apply to:
 - Our products and processes.
 - Our research and development activities.
 - Our authorisation to sell our products.
 - Our interactions with regulators and government officials.
 - Our manufacturing, packaging, distribution and exportation for our industry.
 - The promotion, marketing and sales of our products, including ensuring that what we say is truthful, not misleading, and is consistent with our regulatory approvals.
 - Product quality and safety, including proactively monitoring the safety, quality, and performance of our products, and reporting adverse events and product quality complaints.

7.2 Being a good corporate citizen ...

With the social and environmental challenges facing our planet, we understand that we are part of the solution. Together, we believe we can make a real difference.

- We strive to conduct business in an environmentally responsible manner and are committed to complying with all applicable social and environmental laws and regulations.
- We are passionate and committed about initiatives and partnerships that benefit our people and our environment.
- You, as an integral part of Avacare, are encouraged to be a part of our shared social purpose on a corporate level, through our many Avacare initiatives, philanthropic partnerships, and employee engagement programs.
- We also encourage you to make a difference on a personal level and support your involvement in charitable activities on a volunteer basis.

8. Safeguarding our company

8.1 Financial integrity and protecting assets ...

- We keep complete and accurate financial records that represent the condition and results of Avacare Health and its group of companies.
- We must protect our company's property, assets, and confidential information.
- Financial integrity helps us maintain the trust and confidence we have built over time and we have controls in place to protect and preserve our financial integrity.
- Every employee is responsible for following the policies and procedures that involve company funds, the reporting of financial and non-financial results, and the use of company property and assets.

8.2 Keep private information...private ...

- People trust us to protect their personal information.
- We respect the privacy of our consumers, our customers, our employees, and others with whom we conduct business, and we handle their personal information with care.
- We always practice good cybersecurity so make sure you follow the processes and practices we have in place to protect our networks, computers, programs and data from attack, damage or unauthorised access.

8.3 Use of company assets ...

- We rely on company assets to do our everyday work. These multiple assets are placed in our care and should be used to conduct legal and appropriate business activities.
- When working with company information or technology tools (such as laptops, email, apps, databases, etc.), employees should set up complex passwords and should never share passwords.

8.4 Intellectual property and confidential business information ...

- We must recognise that Avacare's intellectual property and confidential information are irreplaceable assets and must take precautions to secure and protect the use of these valuable assets at all times.
- Intellectual property includes copyrights, patents, trademarks, product and package designs, brand names and logos, research and development, inventions, and trade secrets.

8.5 Respect for trade secrets and confidential information ...

- We respect the trade secrets and confidential information of other companies and individuals and we expect the same courtesy.
- We should collect information from the public domain and not permit inappropriate collection of others' proprietary information.
- When we gather information about our competitors, we must only seek out public sources, such as the media, trade literature, the internet, or other public documents.
- We avoid discussions of competitive information with employees of competitors in all circumstances, including at professional association or industry meetings.
- Always be truthful, and never misrepresent who you are or where you work to learn about competitors.

8.6 Using social media ...

- All employees must comply with the use of social media policies and related company content and assets.

- In personal activities on social media, our employees should be respectful and recognise that their conduct may impact the way others view who we are and what we stand for as a company.
- Be alert to posting and reporting obligations, including adverse event reporting procedures and protecting confidential information of Avacare.
- Employees should be mindful of the content created, shared and posted, remembering that the internet is a public place.
- Always use good judgment when engaging in social media activity.
- Be aware of the difference between social communication and business communication, as most social media platforms and mobile applications are not approved for business-related communication.

8.7 Do not speak on behalf of our company...

- Unless you are authorised to do so, employees may not make any public statements on behalf of Avacare Health.
- We must make sure that information shared about Avacare is consistent, accurate and complete. We have designated individuals to serve as our official company spokespersons.
- Spreading of malicious rumours about the company or any of its employees will be treated with the strictest disciplinary action.

9. How do we conduct our business?

9.1 Always do the right thing ...

- We have the responsibility to know and follow all the laws and regulations that apply to our business.
- We have a commitment to act as a responsible corporate citizen and must demonstrate that we care about and respect the people we serve.
- Any non-compliance with laws and regulations can result in civil and criminal fines and penalties, imprisonment and other commercial or personal disciplinary actions.
- Avacare Health has comprehensive policies, procedures and required training that help employees comply with laws and regulations.

9.2 Respect for our business partners ...

- We value our business relationships and strive to be a good, responsible business partner.
- We work with suppliers around the world. Responsible sourcing is core to who we are and what we do, so we work hard to ensure that the relationships we form are based on mutual respect and trust.
- We try to choose the right partners to make decisions objectively, based on factors like quality, service, price, availability, and reliability.
- We hold our suppliers to our high standards and ensure they operate ethically, in compliance with the law and in a way that is consistent with our Code, our policies and our values. Our Supplier Code of Conduct spells out what we expect.
- We also work with public sector partners and governments around the world. Requirements under government contracts are often stricter than those of our other contracts. As with all our contracts, we follow the rules and never cut ethical corners.
- Always conduct business honestly, fairly, and transparently.

- Comply and cooperate with government inspections, investigations, or requests for information. If you are contacted by a government official, politely direct the individual to the Legal Department.
- Always tell the truth. Never mislead anyone, impede their work, or conceal, destroy, or alter documents.

9.3 Never bribe ...

- We only compete for business based on the quality of our products and services.
- Work honestly, and with integrity. Do not offer bribes, accept bribes, or be bribed.
- Do everything you can to prevent bribery by others who conduct business on our behalf.
- Avacare Health is not only responsible for your actions, but also the actions of any third party who represents us.
- Remember, a bribe can be something other than cash. A gift, a favour, even an offer of a loan or a job could be considered a bribe if it is offered in exchange for a decision.
- Before offering anything of value, check our policies and ask questions about what is acceptable (and what is not acceptable).
- For us, it is simple: bribery...is always wrong.

9.4 Know the rules about gifts and entertainment ...

- We do not give or receive anything that is inappropriate.
- An occasional gift or offer of entertainment is often viewed as a normal part of doing business. But understand that sometimes even a well-intentioned gift or offer can cross the line.
- Any gift that creates a sense of obligation or compromises your professional judgment is always inappropriate.
- We have guidelines in place to identify the circumstances under which an offer is okay...and when it is not. Make sure you follow the rules and be aware of any special restrictions.
- We expect our people to:
 - Always use good judgment.
 - Turn down any offer if it is being given to influence a decision or if it would give the appearance of something improper.
- Gifts or entertainment given or received should -
 - Be nominal in value.
 - Be infrequent.
 - Satisfy a reasonable business purpose.
 - Be consistent with acceptable business practices.
 - Be permitted by law and the policies of both the giver and receiver.
 - Not reflect poorly on, nor embarrass the reputation of Avacare Health.
 - Never be cash or a gift card, check, loan, or stock.
 - Be reflected accurately in our books and records.
- Do not give anything of value to a government official without receiving approval in advance from the Legal Department.
- Never ask anyone for a gift, meal, or entertainment, and if someone asks you, do not oblige.

9.5 Compete fairly ...

- We outperform our competition fairly and honestly.
- We succeed based on our own merits and avoid any conduct that could restrict free trade.
- Becoming aware of competitive information may be normal based on your role or responsibility at the company, but make sure you treat that information ethically and lawfully.
- Compete fairly, but vigorously, and never use deception or misrepresentation or abuse confidential information to gain an unfair advantage over our competitors.
- When you talk with customers, provide only truthful information about the quality, features and availability of our products and services, and do not make disparaging remarks about our competitors.
- Follow the competition laws in the countries where we operate.
- Deal fairly with our customers, suppliers, and competitors.
- Compete based on the quality and merit of our products.

9.6 Follow import, export, and trade compliance rules ...

- We must know and comply with the laws that govern global trade of our products and services.
- If you are involved in trade across international borders, make sure you know and comply with the various country requirements and be aware that the laws of more than one country may apply.
- Make sure anything intended for import or export -
 - Is classified correctly, in advance, based on the country of origin, the destination, the end use and the end user; and
 - Includes all required documentation, labelling, licensing, permits and approvals.
- Ensure the integrity of our supply chain and communicate our policies to others who conduct business on our behalf.
- If you receive a request to participate in a boycott or are asked about our company's position on a boycott, contact the Legal Department immediately.
- If there appears to be a conflict between laws, customs or local practice, get help from the Legal Department or management.

9.7 Avoid conflicts of interest ...

- Do not let personal interests affect the business decisions you make on behalf of Avacare Health.
- A conflict of interest can happen anytime when something you do outside of the workplace interferes with the work you do inside the workplace.
- Being able to recognise a potential conflict can help you avoid one.
- When making decisions related to Avacare Health, you have a duty to act in Avacare's best business interests to avoid even the appearance of a conflict.
- If you discover that a personal activity, investment, interest, or association could compromise, or even appear to compromise your objectivity or your ability to make impartial business decisions, disclose it immediately to your manager, Human Resources or the Legal Department.
- Many conflicts can easily be avoided or addressed if they are disclosed promptly and managed responsibly.