



Code of Conduct

•
i
m
i
•
i
•
i

Table of Contents

01	Introduction	Message from our CEO	4
		Our Code of Conduct	5
		How to raise a concern	6
		Our culture and values	7
02	Code of Conduct	Our work environment	9
		Providing equal and fair opportunities	
		Respect for others	
		Employee health and safety	
		Our products	11
		Medicine safety	
		Promotional practices	
		Protecting company assets	12
		Keeping accurate books and records	
		Good records management	
		Privacy and data protection	
		Protecting the integrity of company technology	
		Safeguarding intellectual property	
		Protecting confidential information	
		Ensuring business integrity	15
		Anti-bribery and corruption	
		Prevention of tax evasion	
		Anti-money laundering	
		Anti-slavery (compliance with the Modern Slavery Act)	
		Inside information	
		Global competition	
		Trade compliance and sanctions	
		Gifts and entertainment	
		Conduct of political activities	
		Speaking to the news media	
		Using social media	
		Avoiding conflicts of interest	
		Our Communities	20
		Protecting the environment	
		Engaging with our communities	
03	Our Ethics & Compliance Programme	Our Ethics & Compliance Programme	22

01

Introduction

- Message from our CEO
- Our Code of Conduct
- How to raise a concern
- Our culture and values

A photograph of a middle-aged man with glasses and a white lab coat, sitting and looking at a tablet. He has a stethoscope around his neck. The background is a blurred office or hospital setting with a plant on the left.

hikma.

Message from our CEO



Dear Colleagues,

Working in the pharmaceutical industry and making medicines that are used by millions of people every day is a privilege and a significant responsibility. This responsibility requires each of us to always adhere to the highest ethical standards, and to clearly understand our company's values, policies, and procedures.

While we always strive to deliver strong business results, how we achieve those results is equally important. From the very start, ethical behaviour has been an integral part of Hikma. We must always ask ourselves, "what is the right thing to do, and what is the right way to do it?".

We trust that our employees understand the importance of integrity and good judgment, but ours is a complex, highly regulated industry and we sometimes may need additional guidance when making business decisions.

This Code is designed to help you understand Hikma's standards, principles and values, and to help you navigate some of the complexities and ethical dilemmas you may face as an employee. Think of it as a guidebook for putting our values into action. It is important that you familiarise yourself with the principles, procedures and information within the Code, and that you commit to maintaining the values that are the cornerstone of our company.

Focusing on quality and integrity have helped make Hikma the success it is today. By following the Code, and behaving in a manner consistent with our values, we can maintain the trust of our colleagues, customers and ultimately the patients whom we serve.



Riad

Our Code of Conduct

An important part of our culture is recognising that doing business with integrity is a shared responsibility of everyone at Hikma. This Code, while not exhaustive, is designed to help navigate situations where you may need additional guidance on applying Hikma's values and business principles. Each one of us is responsible for upholding the principles in this Code and acting with integrity at all times.

It is important that we build and maintain a work environment where people feel safe having open and honest discussions and one in which people feel safe in raising concerns.



Your role:

- Be honest in all of your dealings on behalf of Hikma
- Know and follow the laws, regulations and policies that affect your job and Hikma's business
- Seek advice when you are unsure about what to do
- Make ethical decisions
- Speak-up if you see ethical or legal problems, policy violations or other behaviours that concern you
- Remember that issues are best resolved early on, to prevent or minimise potential harm to you, Hikma, other employees, our partners, and our communities.



Who does the Code apply to?

This Code applies to all Hikma employees, whether full time or part time, and contract workers in all locations worldwide, as well as third parties working on behalf/ representing Hikma.

It is important you understand how this Code affects your work, and how it can help you navigate new and unfamiliar situations, and ethical dilemmas.



How to raise a concern

It is important to speak-up if you have a concern or witness a legal or ethical breach of our Code. Reports can be made anonymously where permitted by law. In those rare instances in which you must identify to make a report, Hikma will maintain the confidentiality of your identity to the extent permitted by law. Reports are treated discreetly, seriously, fairly, and promptly. We do not tolerate retaliation against individuals who raise concerns in good faith.

To investigate complaints, Hikma may seek information from others and this will always be done in a discreet manner with consideration for confidentiality and the reputations of the individuals involved. We expect employees to cooperate fully with internal investigations by providing accurate, timely and truthful information.

Q: How do I raise a concern?

A: In most cases, you should speak to your manager or supervisor. We expect managers to listen to your concerns objectively and address them effectively.

If you're uncomfortable speaking with your manager or if your concern involves your manager, please reach out to your HR Business Partner, one of our compliance officers or use our confidential Speak-up Line. Details of other contacts are set out in our Group Speak-up Compliance Reporting Policy.

Q: When do I report something to the Speak-up Line?

A: You should promptly report suspected or actual violations of our Code, policies and procedures, or laws and regulations governing our business.

Q: How will I be protected from retaliation?

A: Hikma has a strict policy to protect colleagues who report violations from any form of retaliation. Under our Group Non-Retaliation Policy, anyone who retaliates against an employee for raising a good-faith concern will be subject to disciplinary action including termination of employment.



How to Speak-up:

Our Hikma Speak-up Line is completely confidential and is available 24 hours a day, seven days a week in most languages.

When phoning our Speak-up Line you'll speak to an independent operator who is not a Hikma employee.

Reports can also be made to our Hikma Speak-up Line online at www.hikma.ethicspoint.com



What types of issues should I report?

- Fraudulent financial reporting
- Misconduct regarding our policies
- Insider trading
- Data privacy breaches
- Disclosure of confidential information
- Environment, health and safety issues
- Harassment or discrimination
- Any other violations of Hikma's Code

Our culture and values

At Hikma, we foster a culture of individual and collective progress, where employees and teams are united by a shared sense of purpose, belonging and a collective desire to put better health within reach every day for the millions of people who rely on our medicines.

We have three core values that distinguish us: Innovate, Care and Collaborate. These values guide our behaviours and help foster an environment where everyone is appreciated and can do their best work.



You
Innovate

You keep learning

by taking calculated risks and learning from mistakes

You inspire others

and seek inspiration from inside and outside the organisation

You find a better way

if it works make it better; if it doesn't re-invent it



You
Care

You make a difference

by helping others to be successful

You do the right thing

aware of how your actions impact others especially your colleagues and the people who take our medicines

You respect others

trusting their expertise and intentions



You
Collaborate

You keep it simple

challenge convention and complexity making sure you are part of the solution

You work together with others

putting aside personal agendas to achieve goals that matter to Hikma

You take ownership

for getting it done, always keeping your promises

02

Code of Conduct

- Our work environment
- Our products
- Protecting company assets
- Ensuring business integrity
- Our communities



hikma.

Our work environment

We aim to foster a work environment where all employees are safe, feel valued, and can fully contribute to reach their potential.

Providing equal and fair opportunities

Hikma's success is driven by our diverse and talented employees around the world. We embrace, support and encourage the qualities that make our people and their contributions unique. We are committed to equal employment opportunities for all, and we prohibit discrimination in all its forms.



Your role:

- Contribute to a supportive work environment that values different experiences and perspectives and ensures everyone's voice is heard
- Speak-up if you see someone being treated unfairly or in a discriminatory manner
- Make sure any employment-related decisions you make are based on ability, skills, knowledge, work experience and job performance
- Consult with HR and Legal to understand the local labour and employment laws in the countries in which you do business.

Respect for others

We value the contributions of every individual and treat one another with dignity and respect, regardless of position or role. We believe this helps create an environment in which individuals can flourish based on talent, experience, and performance and where potential is recognised and encouraged. Retaliation against any employee who rejects, protests, or complains about unlawful discrimination, bullying or harassment is prohibited.



Your role:

- Always be mindful of how your comments may be interpreted by others
- Avoid actions and behaviours that could be interpreted as being harassing
- Never intimidate or seek to harm anyone physically or emotionally
- Avoid making jokes or slurs, or engaging in sexually explicit conversations or commentary
- Do not engage in romantic or sexual relationships with other employees that may create conflicts of interest, discord or distractions
- Romantic relationships between employees and supervisors are not permitted.



Some examples of discriminatory behaviour:

- Jokes or slurs related to race, religion, ethnic origin or other personal characteristics
- Sexually explicit or suggestive conversations, questions, stories or communications
- Causing humiliation by teasing, bullying, harassment, intimidation or 'ganging up' on someone
- Unwanted flirting or sexual advances
- Hostile physical contact, intimidation, threat or violence.



What is harassment?

Harassment takes many forms and can include words, actions or gestures which the recipient finds insulting, demeaning, hurtful, threatening or exclusionary. Avoid actions that could be considered harassment, and if you witness behaviour you believe to be harassment, report it to Legal or the Speak-up Line.

Employee health and safety

We strive to provide employees a safe and secure working environment. We also expect our employees to take responsibility for their health, and make sure they inform their manager or HR Business Partner of any health conditions that may affect their ability to perform their job.

This is especially important for those working with hazardous materials or in high hazard areas and/or environments. The use of illicit drugs, unsafe use of alcohol or medication is prohibited since this can impair an employee's ability to perform their role and compromise the safety of others.



Your role:

- Always put safety first and avoid actions that you know could be dangerous or harmful to you or others
- Never sell, purchase, possess or use illegal drugs
- Never abuse alcohol or use illicit drugs while at work
- Make sure to follow the health and safety and building advice for your site
- Report any unsafe acts or conditions immediately.

For more information contact:

→ **Site Environment Health & Safety (EHS) personnel**

Our products

Our business practices underpin our reputation and we develop, manufacture, and distribute our medicines with a clear understanding of the responsibilities we have to patients, healthcare professionals, regulators and customers.



Quality & Adverse Events What to watch for:

Product quality issues can include but are not limited to:

- Damaged tablets, capsules, vials, bags
- Faulty packaging
- Contamination
- Over or under-filled capsules or vials
- Label and contents are different products

Adverse events that must be reported include:

- Any unfavorable and unintended or sign, symptom or disease associated with use of the product
- Misuse, abuse, or overdose
- Lack of effect

Medicine safety

Hikma is committed to the safety of its medicines and maintains an active pharmacovigilance programme to help ensure this. Through our robust commitment to pharmacovigilance, we ensure we remain focused on patients' safety. Our Pharmacovigilance Department manages a pharmacovigilance system for the collection, collation, and evaluation of adverse events and the implementation of effective corrective and preventive actions.

For more information contact:

- For medical information enquiries, complaints, and adverse events reporting, contact pv@hikma.com
- In the US, you can also contact us.hikma@primevigilance.com or call **+1-877-845-0689** or **1-800-962-8364**, or you can contact the FDA directly at **1-800-FDA-1088** or www.fda.gov/medwatch
- In the EU, you can also contact portugaleupharmacovigilance@hikma.com or call **+351 939 610 004**

Promotional practices

Hikma is committed to the highest standards of quality for our products and related product information. Our marketing and educational activity is intended to provide healthcare professionals with relevant medical and scientific information so they can make informed and independent decisions about prescribing and using our products.

Our promotional messages and materials must always:

- Seek to educate
- Be fair, balanced, accurate and consistent with the approved label
- Be truthful and not misleading
- Be compliant with all Hikma policies, applicable laws, and industry codes of conduct
- Be supported by appropriate studies or data.



Your role:

- Understand and follow all Hikma policies, applicable laws, and industry codes of conduct in dealing with healthcare professionals about our products
- Ensure all advertising and promotional programmes and materials have been properly reviewed and approved, and are compliant with applicable country, state and/or local laws and regulations.

Protecting company assets

We have a duty to Hikma and its many stakeholders to protect the company's assets and operate in compliance with the laws and regulations of the communities in which we operate. Hikma's assets should be used only for the purposes of undertaking the company's business, not for personal gain, nor for any fraudulent purpose.

Keeping accurate books and records

Financial records must fairly represent the transactions of the company and our financial condition. As a company whose shares are traded on the London Stock Exchange, we must abide by laws, regulations and accounting standards for reporting and disclosing financial information.

It is our policy that information provided in public communications, including our filings with other regulatory authorities in the countries where we do business, be full, fair, accurate, timely and understandable.

All employees and directors who are involved in the financial disclosure process, including the Chief Executive Officer and Chief Financial Officer, are responsible for assuring compliance with this policy.



Your role:

- Never falsify or make misleading entries in Hikma's books and records for any reason, even if directed by a supervisor as doing so may constitute fraud and may subject you and the company to criminal prosecution
- Do not knowingly misrepresent, omit (or cause others to) material facts about Hikma whether within or outside Hikma, including Hikma's independent auditors
- Cooperate fully with internal and outside auditors and any regulatory agencies examining company books and records
- Do not establish any undisclosed or unrecorded fund or asset, nor make or approve any payment with the intention or understanding that it may be used for a purpose other than that described by the information supporting the payment
- Immediately report any unrecorded fund, asset or any prohibited act promptly to Hikma's Chief Financial Officer or Chief Legal Counsel.



What is a "Company Asset"?

Company assets are typically items of value owned by the company and can include things like investments, land, buildings, machines, equipment, furniture, fixtures, vehicles, and intellectual property among other items.

Good records management

Hikma is a regulated business and its records and information are important company assets. There are multiple requirements to be met when we create, use, store and dispose of company records and information. We may face legal proceedings that require us to preserve and keep relevant records.

Failing to meet any of these requirements can result in serious consequences including sanctions and fines.



Your role:

- Store all records in a safe and secure location for the period of time required
- When disposing of documents and records, do so securely and in accordance with Hikma's document retention schedules or legal statutes
- Never destroy or alter any document in anticipation of, or in response to, a request for those documents by any government agency, court, or third party in anticipation of or during litigation against Hikma.

Privacy and data protection

Hikma is committed to protecting and respecting the privacy of employees and those with whom we do business.

During the course of our activities, we will collect, store and process personal data about our employees, customers, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data is a critical component in maintaining trust in the Hikma brand and ensuring that individuals feel confident that Hikma respects their right to privacy.



Your role:

- Ensure that personal data is only collected, recorded, stored, transferred or otherwise processed lawfully, fairly and in a transparent manner
- Ensure personal data is accurate and, where necessary, kept up to date
- Ensure personal data is protected by appropriate security measures – e.g., password protection and access controls.



What is personal data?

The term "personal data" refers to data relating to a living individual who can be identified from that data. Personal data can be factual (e.g. name, date of birth, address) or it can be an opinion about that person, their actions and behaviour.

Personal data also includes an image of a person. We also recognise that some personal data is particularly sensitive and may only be processed under strict conditions.

Sensitive personal data includes information about a person's racial or ethnic origin, political opinions, data concerning health, sex life or sexual orientation.

For more information contact:

- **Legal Representative**
- **IT Security Representative**
- **Company Secretary**
- **Compliance Representative**

For more information consult:

- **EEA and UK Personal Data Privacy Policy**
- **Personal Data Security Policy (and Data Breach Protocol)**
- **California Consumer Privacy Act**
- **Group Share Dealing Code**

Protecting the integrity of company technology

Your use of Hikma's technology should be appropriate, secure, primarily for business purposes and you should exercise good judgment and compliance with company policies when using it. Do not expect use of or communication from company technology to be private.



Your role:

- Keep personal use to a minimum.
- Never use Hikma technology for illegal activities or in ways that interfere with your work or the work of others.
- Don't create, send or download content that could be considered offensive, derogatory, defamatory, sexually explicit, slanderous, libellous, threatening, harassing or obscene
- Use good judgment and caution when using your personal social media. Never assume that a social media post is private.

Safeguarding intellectual property

Hikma's intellectual property rights are important drivers of our business. We will, whenever appropriate, strive to obtain and maintain all necessary intellectual property rights, including patents, copyrights and trademarks. Hikma also respects the intellectual property laws in the various countries where we do business. You must take the intellectual property rights of third parties into due consideration in your daily work. Violations can result in severe penalties for Hikma.



Your role:

- If you become aware that Hikma's intellectual property rights are violated by a third party, or that the intellectual property rights of a third party are being violated, please report to the Legal Department
- If you become aware of an invention or other innovation that can be protected by intellectual property rights, please contact the Legal Department for further advice.

Protecting confidential information

A fundamental responsibility of every Hikma director, officer, and employee is to maintain the confidentiality of the company's non-public information. This includes the non-public information of outside parties (for example, customers, suppliers, business partners, etc.) that may be received in confidence during the course of employment.

The following types of information and documents are considered highly confidential, and strong access controls must be enforced to ensure access is only provided for authorised business use.



Examples of confidential information include:

- Scientific data
- Clinical trial information
- Business strategy and plans
- Contracts
- Commercial relationships
- Customer information
- Inventions
- Patent applications
- Proposed trademarks
- Proprietary documents
- Audit reports
- Non-public financial information
- Business and scientific reports
- Communications with regulatory and other governmental agencies
- Memoranda, correspondence, and records of the company
- All personnel information, including names, addresses, home telephone numbers, payroll records, benefit plans and medical records.

Ensuring business integrity

Personal integrity underlies all our efforts to put better health within reach every day.

We operate openly and fairly, understanding that our behaviour and business practices underpin our reputation. We observe both the letter and spirit of the laws and regulations that govern our industry in the global economy.

Anti-bribery and corruption

We conduct our business ethically, responsibly and free from all and any form of bribery or corruption regardless of local practices or customs. Hikma strictly prohibits any form of bribery and corruption.

This standard applies to interactions with all individuals and corporate bodies with whom Hikma does business – healthcare professionals, customers, suppliers, professional bodies, regulatory authorities, and NGOs – regardless of where they are located geographically.

Hikma will perform due diligence on all third parties with whom the company conducts business. We will not do business with third parties whom we find to engage in corrupt practices or who fail to meet the standards we require.



Your role:

- Be transparent about the purpose of your transactions
- Never accept, offer or give, either directly or indirectly, money or anything else of value, as a bribe or inducement to (1) make, (or as a reward for making or not making), a decision that is favourable to Hikma's interests; or (2) seek to gain an unfair business advantage or otherwise influence business activities; or (3) which compromises their judgment or their ability to act objectively
- Do not give unauthorised discounts, rebates, concessions, commissions or incentives, or bribes or other payments, to obtain or retain business
- Consult Legal and Compliance representatives before offering or accepting anything of value from third parties.

Prevention of tax evasion

Hikma does not tolerate tax evasion or the criminal facilitation of tax evasion.

No one should feel pressured into offering or agreeing to provide assistance to enable another person to unlawfully evade tax for any reason on behalf of or for Hikma. No employee or associate will suffer adverse consequences for refusing to agree to facilitate tax evasion or for taking steps to report any concerns that an offence has been committed.



Your role:

- Carry out appropriate identity verification checks and due diligence on new and existing third parties.

Anti-money laundering

Hikma does not tolerate any business transaction or activity that would directly or indirectly support criminal acts or violate anti-money laundering or terrorism financing laws in any country in which Hikma operates.



Your role:

- Verify the identity of third parties and conduct appropriate due diligence checks prior to accepting funds from, or conducting business with, any third party in order to ensure that the source of funds is legitimate.
- Do not engage in any activity that involves concealing or 'washing-off' the source of criminal proceeds so that they appear to come from legal sources.
- Immediately report any knowledge or suspicion of money laundering to a member of the Legal Department.

Anti-slavery (compliance with the Modern Slavery Act)

Hikma is committed to ensuring that "modern slavery" in the form of forced (including child labour) or compulsory labour and human trafficking does not take place in any of its businesses or supply chains across the globe.



Your role:

- Only engage with customers and suppliers whose employment practices respect human rights and whose ethical standards meet the standards set by Hikma.
- Ensure that the appropriate due diligence has been conducted and engage on the issue of modern slavery with supply chain partners.

Inside information

Hikma is regulated by a number of laws and legislation, including Market Abuse Regulations. It is illegal for an individual to: i) buy or sell Hikma shares or securities while in possession of "inside information", ii) unlawfully disclose inside information to a third party; or iii) carry out, or attempt to carry out, market manipulation. "Inside information" includes any information that is not generally known or available to the investing public, and which, if made public, a reasonable investor would be likely to use as part of the basis of their decisions to buy, hold or sell Hikma shares. Violations may lead to civil and criminal penalties for both Hikma and the individual.

This policy applies to Hikma employees, their family members (i.e., spouse, parent, child or sibling) and to directors and outside consultants.

Although this is not a complete list, information about the following matters may be considered to be "inside information" until publicly disseminated:

- Annual or quarterly financial results or forecasts
- Changes in earnings or earnings projections
- Unusual gains or losses in operations
- Negotiations and agreements regarding significant acquisitions, divestitures or business combinations
- Significant capital expenditures or borrowings
- New product introductions, technological discoveries or regulatory approvals
- Significant litigation
- Major contract awards or cancellations
- Government inquiries or investigations
- Major management changes.



Your role:

- Do not purchase or trade stock on the basis of "inside information" about Hikma or other companies learned through your employment.
- Do not use any "inside information" to influence anyone else's decision to purchase or sell shares.

Global competition

Hikma does not tolerate any business transaction or activity that violates the antitrust and competition laws of any country in which the company does business. Compliance with the letter and spirit of the antitrust and competition laws is essential to maintaining Hikma's reputation for the highest standards of ethical conduct.



What are antitrust laws?

Antitrust laws, also referred to as competition laws, are laws designed to protect free market forces that promote innovation, choice, quality, and consumer access, and to promote the productive ebb and flow of competition.

Antitrust laws proscribe a wide range of anticompetitive business conduct, including but not limited to, market allocation, bid rigging, price fixing, and the use of monopoly power to illegally foreclose competition.

Trade compliance and sanctions

Hikma also is committed to free and open competition in the marketplace in a legal and ethical manner, and requires employees to strictly adhere to the laws, regulations, licensing requirements, boycotts or other embargoes in the countries where we do business.

Certain countries and parties in countries are subject to trade and economic sanctions by the governments of countries in which Hikma operates, which in many cases prohibit even ordinary sales, research, manufacturing, and other commercial relationships. Different export clearance and recordkeeping requirements may apply to exports from each jurisdiction in which Hikma operates.



Your role:

- Familiarise yourself with Hikma's policy on antitrust, and unfair competition, trade sanctions and export controls.
- Be extra cautious in transactions dealing with 'dual use' items and technology which could relate to weapons proliferation.
- Provide accurate, truthful information about our products and other items to customers and other relevant authorities.
- Refuse to engage in prohibited restrictive trade practices.
- Do not do business with parties subject to recognised trade restrictions.
- Scrupulously avoid any conduct or activity, formal or informal, from which even an appearance of anticompetitive conduct could be drawn.
- Be extra cautious in any business activity that may involve a competitor or issues of fair competition.
- If ever in doubt, check with a member of the Legal and/or Compliance Departments.

For more information contact:

- **Compliance Representative**
- **Legal Representative**

For more information consult:

- **Group Anti-Bribery & Corruption Policy**
- **Group Anti-Money Laundering Policy**
- **Group Prevention of the Facilitation of Tax Evasion Policy**
- **Group Share Dealing Code**
- **Group Trade Restrictions, Export Controls and Economic Sanctions Policy**
- **Recusal Policy for US Persons**
- **Group Travel Policy**
- **Gifts Entertainment & Hospitality Policy**
- **Group Antitrust and Unfair Competition Policy**

Gifts and entertainment

At Hikma, we do not give or accept gifts, including entertainment or hospitality, that could raise questions about our integrity or suggest an improper business advantage.

While small gifts and meals are sometimes undertaken to build appropriate business relationships and generate goodwill, they can also create concerns about personal integrity and undue influence even when conducted with the best of intentions.

When permissible, all gifts and hospitality must be modest and infrequent and not consist of cash or cash equivalents like gift cards and may not be conditioned upon or be a reward for purchasing or prescribing Hikma products.



Your role:

- Familiarise yourself with the laws that govern payments to government employees, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act 2010. Be aware of situations that may call into question your objectivity.
- Do not accept any gifts, including entertainment that could compromise, or appear to compromise, your ability to make objective business decisions.
- Hikma Procurement Employees **must also abide** by the Procurement No-Gift Policy, which prohibits the acceptance of gifts and certain business courtesies from suppliers or potential suppliers.
- This standard of conduct is not intended to prohibit normal business practices as long as they are of nominal and reasonable value under the circumstances. However, even gifts of nominal value may be improper if given or received frequently.

Conduct of political activities

Hikma supports the rights of employees to engage in political activities outside of work. However, this must be separate from your role at Hikma, and you must not solicit contributions from co-workers during business hours and or use company assets or resources in connection with personal political activities or contributions.



Your role:

- Be scrupulous about keeping your personal political activities and work separate.
- Do not use Hikma's name, equipment or resources for your personal political activities.
- Do not directly or indirectly use or contribute funds or assets of Hikma to any political party, candidate or campaign, unless it is an accepted practice and lawful in the country involved.
- Any political donation by Hikma must be approved by the Hikma Board of Directors. The approval of the Chief Counsel, Chief Compliance Officer and the EVP of Strategic Planning and Global Affairs must be obtained before presenting the political donation to the Hikma Board for final approval.

Speaking to the news media

We believe we have a responsibility to all our stakeholders to provide accurate, understandable, and timely information about our business.

Only certain Hikma employees are authorised to discuss and communicate information about Hikma's business with members of the news media, financial community, or other non-Hikma audiences.

Any requests for information from brokers, analysts, stockbrokers or the news media should be directed to Hikma's Communications & Corporate Affairs team.

Using social media

Hikma encourages the responsible and respectful use of social media, stressing the need for employees to exercise good judgment and caution when using platforms such as chat rooms, social networking sites, bulletin boards, or similar online media and platforms.

You are encouraged to follow, like and share official posts on Hikma's Facebook, LinkedIn, Twitter, Instagram and YouTube channels.

It is important that even in your personal time, you use social media wisely and thoughtfully. Even content you may believe to be private can easily be replicated and reposted on public channels. In a situation like this, content you may feel comfortable sharing with family and friends can quickly be misunderstood and misinterpreted by those not sharing similar views.



Your role:

- Understand our Social Media Policy and complete the social media training course
- Do not use social media to express controversial, or possibly derogatory or inflammatory messages to another group or person, or what could be interpreted as such
- Never share company, product, or personal information about colleagues or customers
- Refrain from responding to any negative comments directed to the company
- If you see anything that is inappropriate or against these guidelines, please report immediately to socialmedia@hikma.com
- Any adverse event should be reported to pharmacovigilance@hikma.com and medical enquiries directed to medical-information@hikma.com
- Do not create groups or social media channels on behalf of the company.

Avoiding conflicts of interest

Your personal interests must not interfere or influence your business decisions or cloud your professional judgment.

A conflict of interest exists when your personal, social, financial, civic or charitable activities could conflict, or appear to conflict with, Hikma's interests or compromise your objectivity or independence with regard to the performance of your role at Hikma.

Understand that your relatives, close friends, and associates can also create conflicts of interest.



Your role:

- Know how to recognise what is or may be perceived to be a conflict of interest. If you have a conflict or are in doubt, raise it with your manager or Compliance.
- Never use your position at Hikma to benefit yourself, your relatives, close friends or associates.

For more information contact:

- **Compliance Representative**
- **Legal Representative**
- **Communications & Corporate Affairs Representative**

For more information consult:

- **Conflicts of Interest Policy**
- **Group Anti-Bribery & Corruption Policy**
- **Group External Communications Policy**
- **Group Gifts Entertainment & Hospitality Policy**
- **Group Procurement Guidelines**
- **Group CSR Sponsorships and Charitable Donations Policy**



What to watch for:

Some situations where a conflict of interest may arise:

- Making business decisions when a family member or close friend stands to benefit personally, financially or otherwise from the decision
- Hiring or managing relatives or close friends
- Using Hikma assets (including equipment, funds, facilities, know-how, or personnel) or your position for personal gain.
- Having a "material interest" in a company that has significant dealings with Hikma (for example as a competitor, supplier or customer)
- Taking personal advantage of a business opportunity that is discovered through your position at Hikma
- Competing with Hikma's interests or business for personal gain.

Our communities

Having a positive impact on our communities is a founding principle of Hikma. We care about the legacy we leave behind, and this includes how we engage with our communities and how we manage our relationship with the natural environment

For more information contact:

- **Group Corporate Social Responsibility Representative**
- **Compliance Representative**

For more information consult:

- **Group CSR Sponsorships and Charitable Donations Policy**

Protecting the environment

Hikma strives to protect the natural environment and sees sustainable development as a key element of its role as a responsible business. We strive to meet regulatory requirements and promote the sustainable and efficient use of natural resources, waste minimisation, recycling, and energy efficiency.



Your role:

- Actively seek ways to minimise waste and conserve energy.
- Every employee has a role to play, including for ensuring that all waste products, hazardous materials and other regulated items are stored, handled and disposed of in compliance with applicable laws and regulations.
- Immediately report any unsafe storage or improper disposal or release of a hazardous or toxic substance to a supervisor or department head, and to the EHS Manager.

Engaging with our communities

Hikma is proud of its commitment to enhancing the quality of life in our communities and around the world. As part of this focus, we dedicate meaningful resources to social, healthcare and environmental responsibility programmes. Everyone at Hikma is given a day to volunteer each year, and while we coordinate group activities to collectively use this day, employees can use this day to volunteer for whomever they choose.

A focused Corporate Giving Programme, administered by the Corporate Social Responsibility Department, provides support to community and not-for-profit organisations aligned with our mission and core business. As part of this programme, corporate contributions of financial, human and other resources are sometimes granted by Hikma in compliance with the company's principles and local laws and regulations. We do not support organisations with religious or military affiliations.



Your role:

- Coordinate any contribution of company funds or assets to a not-for profit or community organisation with the CSR team.
- Do not solicit contributions to charities and non-profit organisations at work, among colleagues, unless it is for a Hikma-sanctioned or sponsored activity. We maintain a strict, no solicitation policy.

03

Our Ethics & Compliance Programme



hikma.

Our Hikma Ethics & Compliance Programme

We have a Group Compliance function whose responsibility it is to:

- Maintain Hikma's Ethics & Compliance Programme;
- Maintain this Code of Conduct;
- Define compliance standards through policies and procedures, training, auditing and monitoring;
- Provide ongoing compliance guidance to colleagues through training and compliance communications programmes;
- Identify and address areas of potential compliance vulnerability through auditing and monitoring;
- Conduct investigations into possible Code, policy, and other compliance violations and making recommendations to management for follow-up action; and,
- Report regularly to the Executive Committee and the Corporate Responsibility & Ethics Committee of the Board of Directors on compliance issues.

For more information contact:

- **Hikma's Group Compliance team at groupcompliance@hikma.com**

hikma.

hikma.