



CODE OF ETHICS AND CONDUCT

WE'RE MAKING PROGRESS, SO IS YOUR HEALTH !



LDM Promise

Our values at the heart of every activity we undertake

As a responsible and civic-minded company,

Adopting exemplary behavior is our commitment to society. This commitment to integrity is a fundamental principle for LDM and its employees. Indeed, now more than ever, the success and competitiveness of our company rely on our ability to maintain the trust of our stakeholders.



Mohamed ELAMMOUCHI,
PDG

PM1-COD-01-01-EN

NOUS PROGRESSONS, VOTRE SANTÉ AUSSI



Our Values and Expectations

Our values and expectations guide our actions and decisions, helping us become one of the most innovative, successful, and trusted healthcare companies in the pharmaceutical industry.

Our values

We take pride in our values, which are inalienable and guide all our actions :

The Patient at the Center of Our Concerns

We are dedicated to serving patients and considering their needs in every decision we make.

Passion for Quality

We are committed to providing the best customer experience with each of our products and services. Quality is one of our core values, and we all share responsibility for maintaining it in everything we do.

Transparency & Visibility

We build trust within our organization and with society by being honest and open about our actions and processes.

Respect

We support our colleagues and surrounding communities, value diversity and individuality, and strive to help everyone achieve their full potential.

Integrity, Honesty, and Professionalism

We uphold the highest ethical standards and expect the same from others.

Equity & Solidarity

These principles are at the heart of our daily practices



Our values and expectations

Our expectations



To achieve our ambitions and enhance our competitiveness while upholding our core values, we must demonstrate adaptability in our work and behavior.

Innovation

Be proactive in seeking new ideas, encourage initiative, and adopt a creative approach to challenges. Innovation should be integrated into every aspect of our work to maintain our leadership in the industry.

Commitment

Fully invest in our missions, aligning efforts with the company's strategic priorities. Everyone must show dedication, focus on excellence, and support collective success.

Team Spirit

Collaborate effectively towards common goals, understanding how our work supports our priorities of innovation, performance, and trust. Value the diversity of ideas and inspire one another.

Agility

React swiftly to market developments and new challenges. Adjust priorities and resources flexibly to seize opportunities and ensure sustainable growth.



PREAMBLE

- ☐ Objectives of the code of ethics and conduct
- ☐ Who does this code apply to?
- ☐ Why do we have a Code, and why do we need to follow it?
- ☐ How to use the code of ethics?
- ☐ Consequences of non-compliance with this code of conduct
- ☐ How to report a problem
- ☐ Privacy
- ☐ Anti-retaliation policy
- ☐ Periodic certification



PREAMBLE

Objectives of the code of ethics and conduct

Our spirit and our DNA

Our Code of Ethics and Conduct embodies our commitments as a responsible corporate citizen and meets the expectations of our stakeholders affected by our activities. It establishes the fundamental principles and rules that govern our ethical conduct. The Code of Ethics and Conduct serves as our roadmap, guiding us to stay focused on our values. It clearly and precisely defines the minimum standards of conduct that all employees must adhere to. These rules act as a reference to guide our daily decisions and actions.

Who does this code apply to?

It's me, it's you, it's us

This Code of Conduct applies without restriction or reservation to all socio-professional categories of workers employed by LDM and its subsidiaries. It also extends to trainees and workers of contracting organizations operating on company premises, although it does not cover disciplinary proceedings. All such individuals are required to adhere to the standards of behavior and policies outlined in the LDM Code of Conduct during their employment, assignment, or contract with LDM.

Why do we have a Code, and why do we need to follow it ?

Learn, Understand and Respect our Code

To sustain our business and uphold our reputation as a company that prioritizes the needs of those we serve.

To create an open and honest environment that enables us to work with the highest standards of legality and integrity, fostering pride in how we achieve our goals.



How to apply the code of ethics? *Speak Up Courageously*

The Code of Ethics serves as a reference tool to guide each of us in acting with integrity. It encourages us to question and address any situations we encounter in our activities.

Faced with a choice or dilemma, ask yourself the following questions

Does my behavior align with our values and expectations?

Is this behavior compliant with current laws and regulations?

Is my behavior consistent with LDM policies?

Have I evaluated all associated risks?

Will it be well understood by my colleagues?

Would I be comfortable with this if I were a patient or consumer?

Yes

This seems like a good decision, but if you have any doubts, consult your manager.

No

If you answer "no" to any of the questions, reconsider what you need to say or do. Discuss it with your manager or use the reporting channels to speak up.

I don't know

You may also discuss the matter with your Compliance Officer or HR.

PREAMBLE

Consequences of Non-Compliance with This Code of Conduct

Each of us must live by the Code of Ethics and Conduct.



Consequence for LDM	Consequences for Colleagues	Consequences for Patients, Customers, and the Public	Consequences for Shareholders
• Legal proceedings, fines, and penalties; • Disclosure to government agencies; • Loss of business; • Damage to reputation, opportunities, and business relationships.	• Legal proceedings, fines, imprisonment, and other penalties for misconduct; • Disciplinary measures up to and including contract termination; • Damage to personal reputation; • Serious injuries or illnesses.	• Compromised product efficacy or safety; • Environmental risks; • Higher medication costs; • Loss of trust.	• Loss of trust in LDM and its products; • Loss of investment value; • Damage to the company’s reputation in terms of corporate governance.



PREAMBLE

How to Report a Problem?

We all have a responsibility to openly express any concerns if we encounter a problem or observe a situation that does not align with our values and expectations. When an LDM employee, acting in good faith, identifies a breach or potential breach of law, regulation, industry code of conduct, LDM policy or standard, or any principle outlined in the Code of Ethics, they must report the situation using the method they find most appropriate. Regardless of the reporting method chosen, it is crucial to provide as much detail as possible to ensure a thorough and timely resolution of the issue.



Option 01

Option 02

Option 03

Discuss the Issue with
Your Manager

Discuss the Issue with The
Compliance Officer and/or HR

To Report the Problem:

Online: Use the confidential reporting system by scanning QR Code

By Phone: Call Compliance at +213 560 917 869.

By Email: Send a report to Speakup.compliance@ldmgroupe.com

Formulaire de Plainte Éthique





PREAMBLE

Confidentiality

Can I protect my identity when contacting LDM?

It is essential that you feel safe when participating in the company's compliance program. Every effort will be made to protect your identity when interacting with compliance personnel. However, in some cases, it may be impossible to maintain the confidentiality of the reporter due to the nature of the investigation or certain legal requirements. When permitted by law, colleagues concerned about confidentiality may choose to make an anonymous report.

CONFIDENTIAL

Anti-Retaliation Policy

We do not tolerate retaliation.

Our company does not tolerate retaliation against anyone who raises a concern under this Code or cooperates with an investigation. Any employee found engaging in retaliation will face disciplinary measures, up to and including dismissal.

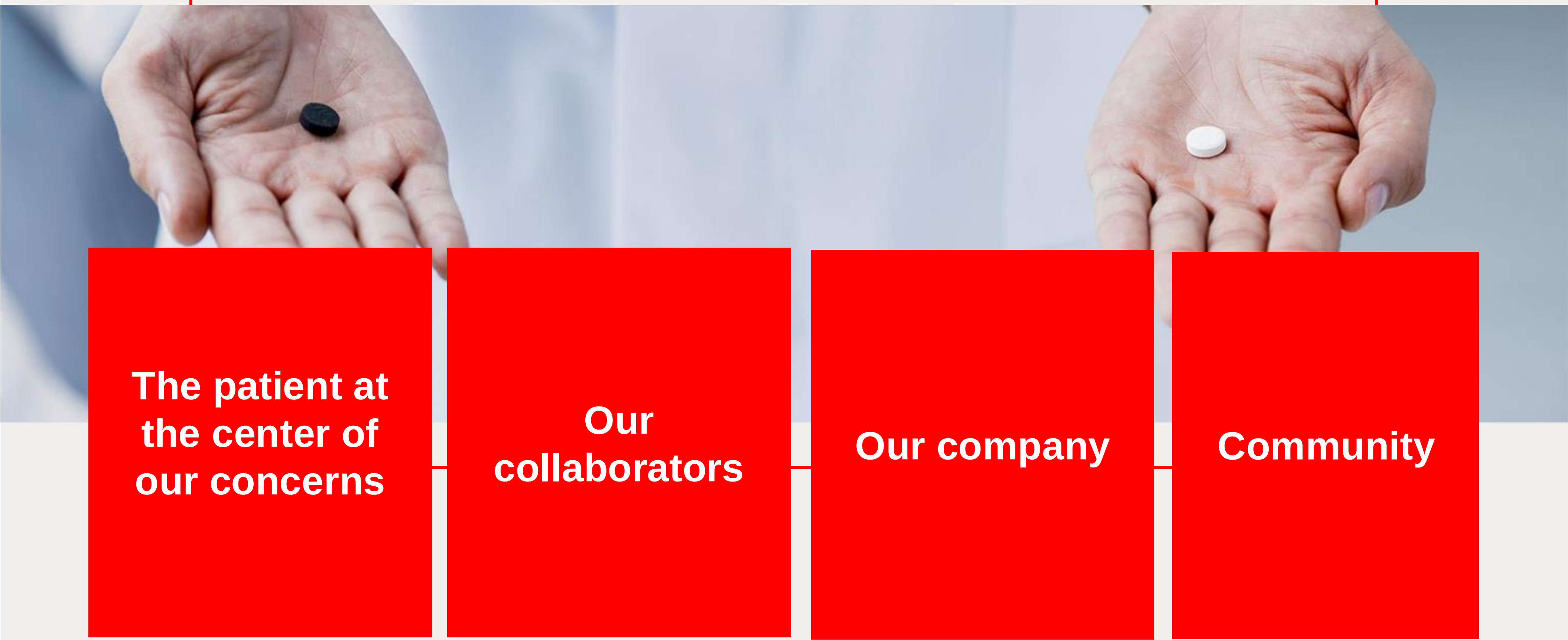


periodic certification

Annually, all employees will be required to confirm that they have received, read, and understood this Code of Conduct.



Performance with integrity



**The patient at
the center of
our concerns**

**Our
collaborators**

Our company

Community



Performance with integrity

The patient at the heart of our concerns

Patient safety is our top priority.

Patient and consumer safety is always our top priority, and we are committed to:

- ✓ Applying the strictest standards.
- ✓ Providing patients and healthcare professionals with only medications/products that have been authorized for market release by the relevant authorities and are distributed in accordance with internal procedures and requirements.
- ✓ Manufacturing high-quality products in compliance with current regulations and the highest quality standards, "GxP."
- ✓ Carefully monitoring and documenting our work to maintain accurate and comprehensive records.
- ✓ Ensuring patient safety by identifying, assessing, managing, and reporting any potential risks arising from a product in a timely manner (within 24 hours of discovery):
 - Complaint management system.
 - Pharmacovigilance, materiovigilance, and cosmetovigilance systems.
- ✓ Reporting any suspected counterfeiting of pharmaceutical products.
- ✓ Honestly communicating product information so that patients, consumers, and healthcare practitioners are informed about the use, safety, contraindications, and side effects of our products.
- ✓ Improving patient access to healthcare and contributing to the strengthening of the country's healthcare system.
- ✓ Effectively managing the quality of our products.





Performance with integrity

Our collaborators

For a Healthy, Creative, and Stimulating Work Environment

We treat our employees with fairness and respect.

Recruitment and Selection

The company is committed to a fair and merit-based recruitment process, evaluating each candidate solely based on their skills and experience, without discrimination based on race, ethnicity, gender, religion, disability, physical appearance, or family situation...

All stages of this process are conducted with rigor and professionalism, respecting the dignity and confidentiality of each applicant.

Child Labor

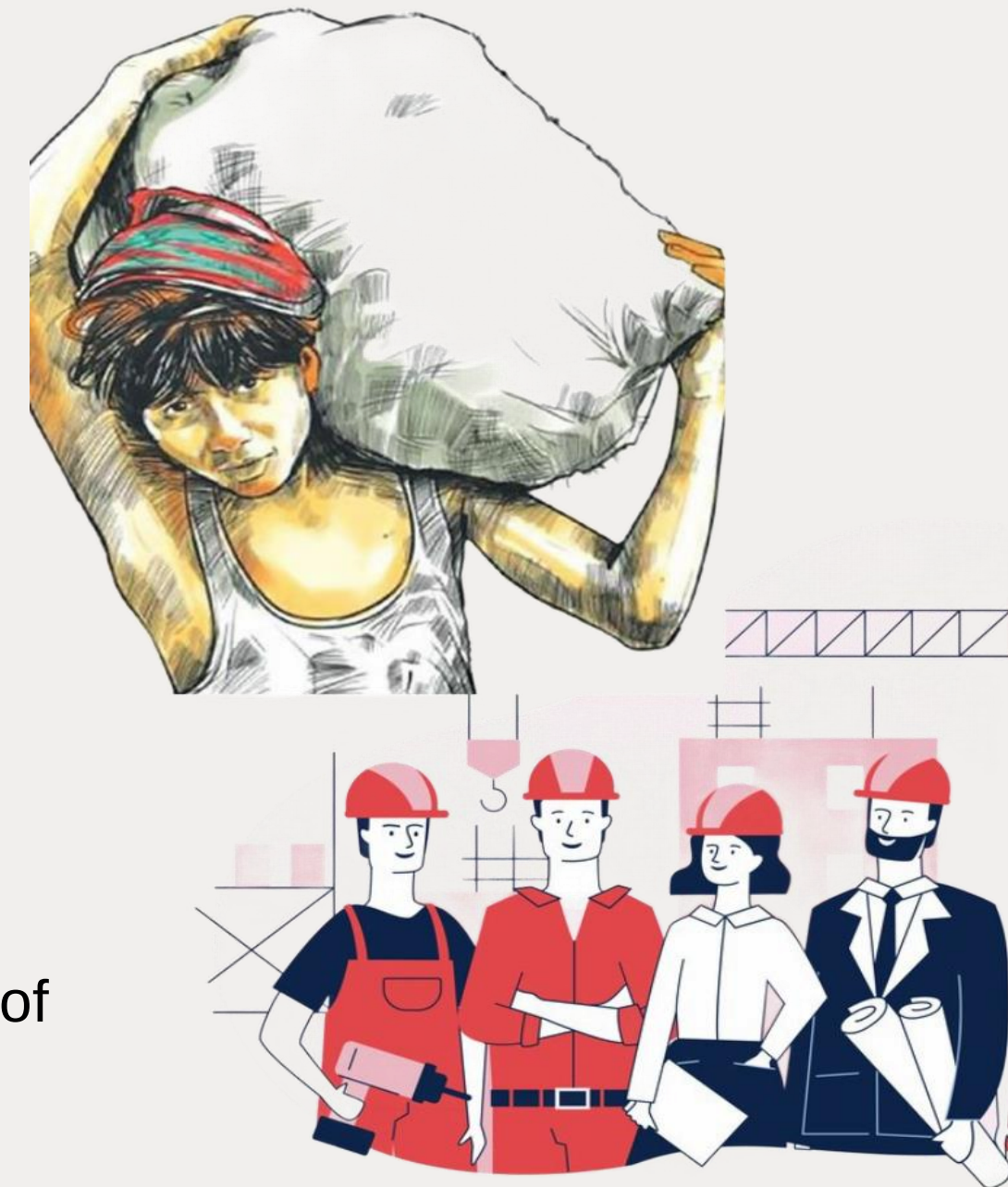
Child labor poses a significant threat to the mental and physical well-being of children and can lead to exploitation, irreversible damage, and severe compromise of their rights and futures. In light of the rigorous nature of our activities, LDM has set the minimum recruitment age at eighteen, even though Algerian regulations allow recruitment from the age of sixteen.

Prisoner Work

In line with our recruitment policy, we do not hire individuals currently in detention or serving a sentence of incarceration.

Working Hours

Legal working hours are set at forty (40) hours per week, spread over a minimum of five (5) working days, under standard working conditions.





Our collaborators

For a Healthy, Creative, and Stimulating Work Environment

Rest and Leave

- The weekly day off and public holidays are considered legal rest days.
- Each employee is entitled to a minimum of one weekly day off.
- In accordance with work practices in Algeria, the weekly day off is scheduled on Friday.
- Any employee who works on a legal rest day is entitled to compensatory rest of equal duration and an increase in overtime pay.
- Overtime worked during weekdays is paid with a 50% premium.
- All employees are entitled to an annual leave paid by the employer.
- Employees are also entitled to special leaves, fully paid by the employer: paid leave for family events (wedding, birth, death, etc.), maternity leave with paid absences for breastfeeding, paternity leave, as well as legal holidays including national and religious celebrations in accordance with current regulations.
- When economic or organizational requirements necessitate, the weekly day off may be postponed or taken on another day.

Salary and Benefits

- Employees receive compensation that includes a base salary, determined by their professional classification and which must be higher than the National Guaranteed Minimum Wage (NGMW). In our company, the minimum salary exceeds the NGMW by 25%.

Ongoing Training and Skills Development

- Employees have fundamental rights to ongoing training and skills development, which are essential to their professional growth and fulfillment within the company. These rights include access to appropriate training, equal opportunities for development, tailored support, recognition of acquired skills, dedicated time for training, as well as clear and transparent communication about available programs.

Personal Data

- Our company is fully committed to respecting the privacy of all its employees. We never retain original copies of passports or any other identity documents for any reason. Furthermore, we guarantee that no restrictions will be placed on their freedom of movement. We believe that every individual should be free to fully enjoy their fundamental freedoms. These principles are central to our values and are essential for maintaining a respectful and ethical working environment.

Our collaborators

Performance with integrity

For a Healthy, Creative, and Stimulating Work Environment

Absence of Harassment, Discrimination, and Violence in the Workplace

LDM is committed to fostering and maintaining a work environment free from discrimination, harassment, sexual harassment, and retaliation.

Responsibility of Managers

Our leaders are responsible for ensuring that the workplace remains free from all forms of discrimination, harassment, sexual harassment, and retaliation. They must also report any inappropriate conduct they become aware of.

Zero Tolerance for Harassment

Harassment, bullying, or violence in any form—including hostile physical contact, intimidation, or threats that create an unsafe work environment—will not be tolerated. Such behaviors may result in disciplinary action, up to and including dismissal.



Equality and Respect

Discrimination based on personal characteristics unrelated to work, such as age, gender, race, ethnicity, sexual orientation, gender identity, national origin, or religious beliefs, as well as union membership or activity, is strictly prohibited. Likewise, no form of harassment or intimidation is tolerated.



Performance with integrity

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For a Healthy, Creative, and Stimulating Work Environment

Freedom of Opinion, Speech, and Association

We respect the right of employees to join an association, provided that local legislation is respected. We recognize each employee's freedom of opinion, expression, and speech, provided that it does not interfere with their ability to fulfill their professional responsibilities and does not conflict with the LDM Code of Ethics and Conduct.

Our Commitment to Human Rights

We fully assume our responsibility to respect human rights, particularly through the strict enforcement of labor laws and the rejection of any form of forced labor. We are also committed to ensuring patient safety and sharing scientific information to support research and development, to the extent possible. We strive to form partnerships only with entities that share our strong commitment to human rights and labor standards, especially those concerning child labor and the exploitation of children.

Health and Safety at Work

Our Physical Capacity and Health Preservation Test process ensures that all employees meet the health requirements for their specific tasks and responsibilities. Depending on the job profile, some of our employees undergo pre-employment medical examinations and physical fitness assessments.

Promoting a Healthy Work Environment and Offering Health and Wellness Programs

- Identify and mitigate workplace safety risks.
- Investigate incidents and potentially serious events.
- Provide assessments and support for our employees.



Performance with integrity

Our company

*Integrity, Honesty, and Responsibility in
Business Conduct*

Respect for Laws, Regulations, and Professional Codes of Ethics

- ✓ We operate in strict compliance with applicable regulations.
- ✓ We conduct our activities with the highest level of integrity.
- ✓ We prohibit any involvement in actions that would deviate from legal principles. Violating them would expose us to judicial and financial sanctions or civil or criminal lawsuits, both at the company level and for its employees. It would also contribute to the deterioration of our brand image.
- ✓ We ensure the protection of confidential data and information at all levels of our organization, for the benefit of patients, our employees, and stakeholders, while ensuring full compliance with regulatory obligations.

- ✓ We adhere to the group's privacy policy.
- ✓ We comply with the rules regarding data security.
- ✓ We respect the rules governing the distribution, reproduction, retention, and destruction of documents and any other means of data storage.
- ✓ We handle confidential matters with the utmost caution in external environments.
- ✓ Unauthorized devices, such as personal computers, may not be used to transmit, store, or work on proprietary information.
- ✓ We ensure that every project involving personal data integrates privacy principles by design. Additionally, we guarantee transparency by following a structured compliance roadmap, step by step.



Performance with integrity

Our company

Integrity, Honesty, and Responsibility in Business Conduct

Use of LDM Devices for Personal Purposes

The use of LDM devices for personal purposes should be minimized to address only urgent needs, without impacting professional performance or generating unauthorized or inappropriate costs for the company.

Protection of Our Image

The content published on our corporate accounts by dedicated and trained teams reflects our values and culture. The information we share is accurate, authentic, and timely. It is designed to be accessible and engaging for a broad range of stakeholders and communities, while encouraging participation and interaction.

✓ We are committed to ensuring that our activities on these platforms are conducted responsibly, in accordance with industry standards and applicable regulations, while maintaining good promotional practices.

✓ We act responsibly in our statements and expressions of opinion on social media.

✓ We communicate responsibly. We should be aware that any information published on the internet can have repercussions on the reputation and image of the individuals mentioned.

✓ We avoid commenting on or discussing content related to LDM's activities, health authorities, or competitors, published by third parties or the general public.

✓ Any communication on behalf of LDM must be approved in advance. Only authorized and trained individuals are permitted to make official statements on behalf of LDM.





Performance with integrity

Our company

*Integrity, Honesty, and Responsibility in
Business Conduct*

Relations with Patient Associations

We interact with patients and patient associations with integrity, mutual respect, and transparency.

Relations with Healthcare Professionals

- ✓ We respect their independence.
- ✓ We comply with regulations concerning the transparency of statements related to payments linked to our interactions with healthcare professionals.

Conflict of Interest

We should avoid situations where our personal interests may conflict with our responsibilities within the company. A conflict of interest arises when an individual's or organization's responsibilities or financial or other interests are in conflict, and satisfying one interest could negatively impact other interests or responsibilities. A personal conflict of interest occurs when a personal relationship or activity may influence an employee's judgment and ability to perform their job objectively and fulfill their duties to their employer. A situation that appears to present a conflict of interest can be sufficient to expose our company to risks.

As employees,

- ✓ We must never allow shared interests or personal gains or benefits to prevent us from acting in the best interest of our company and the patients and consumers we serve.
- ✓ We should disclose any real or potential conflicts of interest before engaging in operations, activities, or relationships that may lead to such a situation.
- ✓ We must disclose real or potential conflicts of interest during the recruitment process.
- ✓ We should avoid supervising or participating in the hiring or promotion of a family member.



CONFLICT OF INTEREST

Performance with integrity



Active Commitment Against Fraud and Corruption

Corruption is an illegal practice in all environments in which we operate. It is our responsibility to address these issues with transparency, report any suspicion of corruption, and open a dialogue to assess situations that could lead to fraud or corruption.

Gifts & Hospitality

As in any business activity, we may offer or receive gifts, hospitality, or entertainment. We must determine, in each case, whether they are appropriate. In certain situations, gifts or hospitality could be perceived as a bribe. Before offering or accepting any gift, we must ensure that it complies with our policy and local requirements, is within the normal course of business, and does not influence the decision of either party. We do not offer or accept any gift or hospitality if it could be perceived as having excessive value or as an attempt at bribery.



Respect for Free Competition

We are committed to fair competition and do not violate any competition laws or regulations.

Asset Protection

LDM employees must protect the tangible and intangible assets of the company (buildings, facilities, equipment, physical and intangible work tools, know-how, technical data, company documentation, funds, etc.) from any abuse, degradation, waste, or destruction.

Reporting Obligations

We collect and report safety and quality information on LDM's pharmaceutical and consumer health products to ensure the safety of patients and consumers.



Performance with integrity

Our company

integrity, honesty and responsibility in business conduct

Adverse Events Related to Pharmacovigilance

All LDM employees who become aware of an adverse event in the course of their duties at LDM must report it to the Pharmacovigilance Department immediately and no later than 24 hours after receiving it.

Quality Issues

All LDM employees must report quality concerns to their local Quality Assurance contact immediately, but no later than 24 hours after receiving them.

Counterfeit Cases

Each employee is responsible for reporting any product suspected of being counterfeit or falsified to their Quality contact immediately and no later than 24 hours after receipt.

Digital Activities

All LDM employees sponsoring digital activities must include appropriate disclaimers and ensure that suppliers are contractually required to perform daily checks and report to LDM no later than 24 hours after receipt.

External Partnerships

Agreements detailing the management of pharmacovigilance, compliance, and quality issues must be adhered to.



Performance with integrity

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integrity, honesty and responsibility in business conduct

Adverse Events Related to Employee Safety

Each employee is responsible for reporting any adverse event (accident, incident, foodborne illness, accidental spills, etc.) to the HSE manager immediately and no later than 8 hours after its occurrence (shift).

The following incidents must be reported promptly, whether they have already occurred or have the potential to cause harm to employees, sites, products, or LDM assets:

- **Security incidents and/or criminal offenses, such as:** acts of violence, theft, property offenses, burglary, vandalism, unauthorized access, cybercrime and fraud, intellectual property theft, espionage, counterfeiting, extortion, kidnapping, threatening calls or letters.
- **Large-scale emergencies and/or crisis events, such as:** terrorist attacks, riots/insurrections, coups d'état, acts of war, threatening natural phenomena, disasters, and large-scale emergencies.



Formulaire de Code d'éthique et de conduite

