



Er-Kim Code of Business Ethics





Chairman of the Board of Directors

Dear Er-Kim Family,

Since its establishment in 1981, the main objective of our company has been to fully meet the needs of our country's patients with new treatments. In order to achieve this goal, working ethically has been our most fundamental principle since the day we were founded.

Er-Kim Code of Business Ethics reflects our legal and ethical responsibilities to all our stakeholders and commits our commitment to them. The principles in this booklet will be a guide for all Er-Kim employees. It is our common responsibility to reflect our ethical principles in all our business without compromise.

I thank you in advance for your commitment to our company's ethical values.

Best regards,



As Er-Kim

We build our business on **trust on honesty**.

Since the day it was founded, Er-Kim has acted with the belief in the sanctity of the health sector and has adopted a reliable and accurate business conduct as a principle.

We are **innovators** in a word developing with the power of science.

Er-Kim should be a trend-setter in all business issues and working areas, including ethical principles in the sector.

We embrace **diversity** with our global identity.

Er-Kim, which maintains business relationships all over the world, is a global organization that supports diversity by being inclusive and values differences in its country and work areas.

We work for **sustainability**.

Er-Kim believes in the balance of environmental and social results in the name of sustainability with the healthy, safe and pleasant working environment it creates for its employees, the differences it creates in products and services, its continuous communication with its stakeholders to understand expectations and the position it takes in social and environmental conditions.



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Relations with Employees

Our Working Environment

We provide a physically and psychologically safe work environment.

We aim to ensure that office and other working environments are peaceful with the work we carry out within the framework of local and international laws and ethical rules.

As Er-Kim, we keep respect and human value at the top. Therefore, we do not allow or tolerate harassment, pressure and intimidating behavior in the work environment. We encourage all employees who feel they have been discriminated against in any way, or who feel there is discrimination against our diversity principle, to speak up.

- ⦿ We are informed about information on the working environment and workplace safety and keep our information up to date.
- ⦿ We follow the safety instructions given to us.
- ⦿ We use the necessary personal protective equipment to do our job.
- ⦿ We contribute to identifying the causes of occupational accidents and participate in the process of preventing their recurrence.

Equality of Opportunity

At Er-Kim, recruitment, promotion decisions and performance evaluations unconditionally adhere to equal opportunity. No discrimination is made on the basis of race, religion, belief, nationality, gender, color, sexual preferences, marital status, disability, etc.

Everyone is treated equally and fairly. It is the responsibility of everyone, especially managers, to maintain this situation and to stop behaviors contrary to equality of opportunity.

In case of discrimination against ourselves or others, we will intervene or contact the Ethics Hotline (etik@er-kim.com.tr).

Open Communication

The principle of open communication is one of Er-Kim's building blocks. We maintain this principle of open communication in our offices and all other communication channels through our Notification, Consultation and Whistleblowing Policy.

We are working to ensure that employees, managers and all stakeholders can communicate with Er-Kim comfortably and confidently.

We remind our employees that they have the right to reach the relevant person and manager with any questions or problems. At this point, we raise awareness so that managers know their responsibilities and consult the ethics hotline on relevant issues.

Respect for Privacy and Confidentiality

We act with the awareness that each Er-Kim employee has a private life outside the life they lead with us.

We respect employees' lifestyles outside of work as long as they do not contradict company principles and rules.

It is the duty of the entire Er-Kim family, especially HR, to treat the personal data of all employees, including managers, with respect and to protect the personal data stored with the utmost care.

The data of all Er-Kim employees are collected by taking the necessary measures in accordance with KVKK, provided that there is a valid business reason.

Correct Use of Company Resources

As Er-Kim, we allocate various resources to our employees in accordance with their needs in order to increase productivity.

These resources can be physical fixtures such as computers and vehicles, or resources such as confidential information or trademarks. All these resources are used only for business purposes, for their intended purpose and in accordance with all applicable rules.

Company Reputation

As Er-Kim employees, we are responsible for the reputation of our company and all licensor companies we represent in our country.

We avoid all behaviors that may harm brands. We do not engage in any political, governmental, commercial or religious organization by using the name of Er-Kim or our business partners.





Our Principles to Protect Our Patients

Company Reputation

We prioritize quality in every business area of Er-Kim.

Since our establishment in 1981, we have been representing our business partners in our country with merit, offering high added value to our patients and providing impartial and high quality scientific services to physicians. We never compromise compliance with laws and regulations in our operations.

Through the existence of our Quality Assurance System and Compliance Program, we ensure that our standards are established and maintained and that our policies and principles guided by these standards are ethical and sustainable.

As Er-Kim employees, we are responsible for ensuring that all departments provide high quality service and that working procedures comply with laws, regulations and international standards.

Product Safety

As Er-Kim, we are responsible for the safe use of all the products we are licensed for in our country.

All company employees complete training on the safety of our licensed products.



Any Er-Kim employee has the obligation to contact the Er-Kim pharmacovigilance officer at dserkim@er-kim.com.tr and pv@deltapv.com with the necessary information within the first 24 hours of becoming aware of a side effect and/or adverse event about our products. Our Er-Kim pharmacovigilance officer has to notify all necessary units in accordance with the regulations of the Ministry of Health.

Clinical Studies

We conduct our clinical trials based on transparency and our ethical principles.

We conduct scientifically valid clinical research that offers justifiable value for the prevention, diagnosis or treatment of diseases.

We prioritize human rights, safety and health throughout our clinical work and are mindful of privacy.

We also adhere to these policies in clinical trials conducted with external partners, such as medical and research institutions. It is part of our scientific working principle to fully and impartially share clinical studies containing information for and against the products for which we hold a license and not to mislead physicians.



Information Provision

We provide information with the pride of being a company that ensures the delivery of medicines that have a significant impact on people's lives in accordance with applicable laws, regulations and trade norms, with the Turkish distributorship of medicines offered to the market by major pharmaceutical companies from all over the world.

We share the correct use of medicines and important product information for patients accurately and clearly.

We monitor health conditions and ever-changing patient needs in each country and region and use appropriate measures to provide, collect and communicate information in a timely manner.

Compliance with Health Laws and Regulations

As we are a company operating in the pharmaceutical and health sector, we are subject to all health laws and regulations and fully comply with them.

It is our responsibility to know and apply these laws and regulations.



Our Relations with Stakeholders

Business Partners

Er-Kim only considers quality, reliability, price and added value in the procurement of services and goods. In all business partnerships, we look for partners who work in accordance with Er-Kim ethical and business principles.

We regulate all partnerships with contracts that comply with laws and rules and have been reviewed by the Legal and Compliance Officer.

We regularly audit business partners' compliance with laws and rules.

Our Supply Chain

We strive to ensure that the medicines we are responsible for safeguarding reach healthcare professionals and patients safely and that our product quality is maintained at every stage.

We correctly identify our risks and strengthen the functioning of our supply chain with the appropriate measures we take, including in unforeseen situations.

Combating Corruption and Bribery

We apply our country's anti-corruption and anti-bribery laws in all day-to-day operations and feel responsible in this area.

We have scientific, educational, sales, promotion, marketing and licensing agreements with public and private institutions and individuals. We continue our existence with the dynamics of the rules we have to follow in many areas.

We comply with local and international anti-bribery regulations to which our licensors are subject. Under professional ethics, we act in accordance with the ethical legislation that we believe the healthcare sector must comply with.

For this reason, as Er-Kim, we do not allow any kind of corruption and bribery, even if it would lead to a loss of business.

We discuss our anti-corruption principles and rules in detail in our Anti-Bribery and Anti-Corruption Policy and expect everyone in Er-Kim work areas, especially our employees who are in contact with business partners and officials, to act in accordance with this policy.

- We make it clear to our company employees and third parties that Er-Kim has a zero-tolerance approach to bribery and corruption and will not receive or accept (directly or indirectly) any offer, payment, gift or favor.
- We assess the integrity of third parties. We carefully review the outputs of this assessment before identifying third parties. In case of any concerns, we will notify the Legal and Compliance Officer.
- If an offer or transaction occurs that in any way resembles corruption and violates the Policies, we will immediately notify the Legal and Compliance Officer.
- We help to ensure that third parties acting on behalf of Er-Kim are not involved in corruption. If we enter into contracts with external partners, including local authorities, we sign the 3rd Party Relations document and Er-Kim Anti-Bribery and Anti-Corruption policy.
- We refuse to accept any payment that is not for the service that the partner is obliged to provide.
- If we have doubts about whether we have acted appropriately, we will discuss it with our manager or contact our Legal and Compliance Officer.

Conflict of Interest

Any relationship that is not in the interest or benefit of the Company constitutes a conflict of interest. We recognize that if our personal interests influence our business judgment or decisions we make on behalf of the company, a situation arises that we must avoid.

We disclose actual and potential conflicts of interest and take measures to prevent them.

We avoid conflicts of interest both in our areas of work and in our relationships with our stakeholders.

It is possible to encounter conflicts of interest through many issues such as additional business and partnerships, confidential insider information, use of company resources for personal purposes, situations that may harm confidentiality and privacy, political activities, gifts and entertainments, competition issues, etc.

- If we have any doubt that we find ourselves in a potential conflict of interest, we talk to our manager.
- We do not abuse our position at Er-Kim for personal gain.
- We ensure that Er-Kim makes the most of potential business opportunities.
- We do not work for or own more than 5% of a competitor.
- We do not assist our relatives, friends or close circle of relatives to become suppliers or distributors or to enter into other financial agreements in matters involving Er-Kim.
- We do not allow our way of doing business at Er-Kim to be influenced by our personal, financial or political activities.

Gifts, Entertainments and Travels

The regulations, ethical and legislative rules issued by the Ministry of Health outline the definitions of gifts and entertainments, the scope of travel, and the areas to be considered during activities with healthcare professionals and associations.

Er-Kim Gift and Entertainment Policy, which has been prepared in accordance with these local and international rules, addresses this issue in detail.

We know at what point a gift is acceptable and at what point it should be considered a conflict of interest.

A gift is something received and/or given by the parties in a business relationship as a matter of courtesy, which does not require any material and/or immaterial return. Gifts that may prevent the other party from making a fair decision are contrary to Er-Kim ethical values.

Ask Yourself!

- Is gifting normal and common in this area?
- Will the gift, entertainment or entertainment offered cause misunderstandings?
- Does the gift directly affect or influence the impartiality of the business?
- Is the gift value more than fair value?



Working with Health Professionals

Due to various scientific activities, Er-Kim organizes congresses, presentations, symposiums, etc. with healthcare professionals. We make sure that these activities are appropriate for the business purpose, scientific and in compliance with all laws and regulations.

We ensure that the activities that accompany these activities, such as meals and entertainment, are appropriate and in accordance for educational, clinical or scientific discussions.

We are also aware of our responsibilities to report such activities and transfers of value to competent government authorities in accordance with laws and regulations.

In our communication with healthcare professionals, healthcare institutions, pharmacies, dealers and other suppliers and public officials, we take care to act in accordance with our Code of Business Ethics, policies and procedures, laws and regulations and sectoral standards that Er-Kim has.

We prevent the medical decisions of healthcare professionals from being inappropriately influenced. We make sure that all stakeholders representing us have no conflict of interest in this regard.



Promotion Activities

We only promote the products in our portfolio in accordance with ethical rules, quality, functionality, safety and added value.

We prepare all our promotional materials so that healthcare professionals have a clear understanding of the clinical benefits and risks of our products.

We follow an honest and transparent attitude in our promotional activities and act in compliance with all laws and regulations.

Accuracy of Financial Records and Reports

All financial records of the Company must be kept on time, must be accurate, must be supported by the necessary documents and must be organized in accordance with the law.

We settle all financial obligations on time and in full and pay them on due dates without any delay.

- We record all records accurately, completely and immediately,
- We only make purchases, sales and transfers of goods and assets for which we are authorized. We make sure that the transactions we approve are based on legitimate and valid documentation,
- In the event of any possibility of corruption, misrepresentation of accounting or other information and/or facilitation of payments, we report the situation to our Finance Officer and Legal and Compliance Officer,
- We keep the records in accordance with local laws and regulations, for the requested period and in accordance with Er-Kim İlaç's Data Retention Standards,
- If requested, we retain records that may be relevant to an ongoing audit, litigation or regulatory investigation, even if the normal retention periods have been exceeded,
- We cooperate fully, openly and honestly with internal and external auditors, tax authorities and other regulators.

Fair Competition

As Er-Kim, we support a sector open to competition. In today's business world, we operate knowing that it is almost impossible to conduct economic activity without understanding and complying with competition law. Ignoring the rules of competition can be very risky and expensive for a business.

All Er-Kim employees know the rules of fair competition and apply them to their daily work. In case of any doubt, we consult with our Legal and Compliance Officer for compliance with competition rules.

In this context, we prohibit any written or verbal agreements or concerted practices with competitors that are contrary to competition laws, abuse of dominant market position, or prevent or restrict free competition, among other matters.

It is forbidden to fix prices, restrict supply, share markets, customers, tenders, share campaign information in meetings with competitors, which is a legal and in some cases a requirement.

As Er-Kim, we comply with the rules detailed in our Fair Competition Policy.



Society and Environment

Media and Public Relations

As Er-Kim, we observe the principle of openness and compliance with its purpose in our relations with the society and the media, which acts as a bridge with the society.

We forward any questions from the media to the Er-Kim Board of Directors. Our Board of Directors responds openly to questions from the media.

In addition, as most of our activities are related to human medicinal products, media relations on these topics are subject to various laws and regulations, and in most cases, promotion through the media (including social media) is strictly prohibited. We determine our processes within the scope of the procedures we have in accordance with the laws and regulations we are subject to.

Donations and Sponsors

Through local and global networks, we follow the latest developments in new research, practices and examples, and share our experience and knowledge with 3rd parties.

We are in contact with ministries, legislators and civil society organizations.

We support local organizations and healthcare professionals through donations and sponsorships, provided that they comply with the Ethical and Legislative principles published by the Ministry of Health and the interests of Er-Kim and do not contradict our Ethical Principles.

Sustainability and Environment

Our primary objective is to minimize the potential negative impact of our operations on the environment.

As Er-Kim, we are committed to complying with national and international legal requirements on environmental issues.

In all of our areas of operation, we take the necessary measures to reuse recyclable waste, reduce the use of limited natural resources, prevent pollution from environmentally harmful wastes, protect natural assets, prevent pollution and improve the environment.

We recognize that achieving sustainable results relies on socially and environmentally responsible decisions. We remember that economic growth and survival depends on being sensitive to our world.



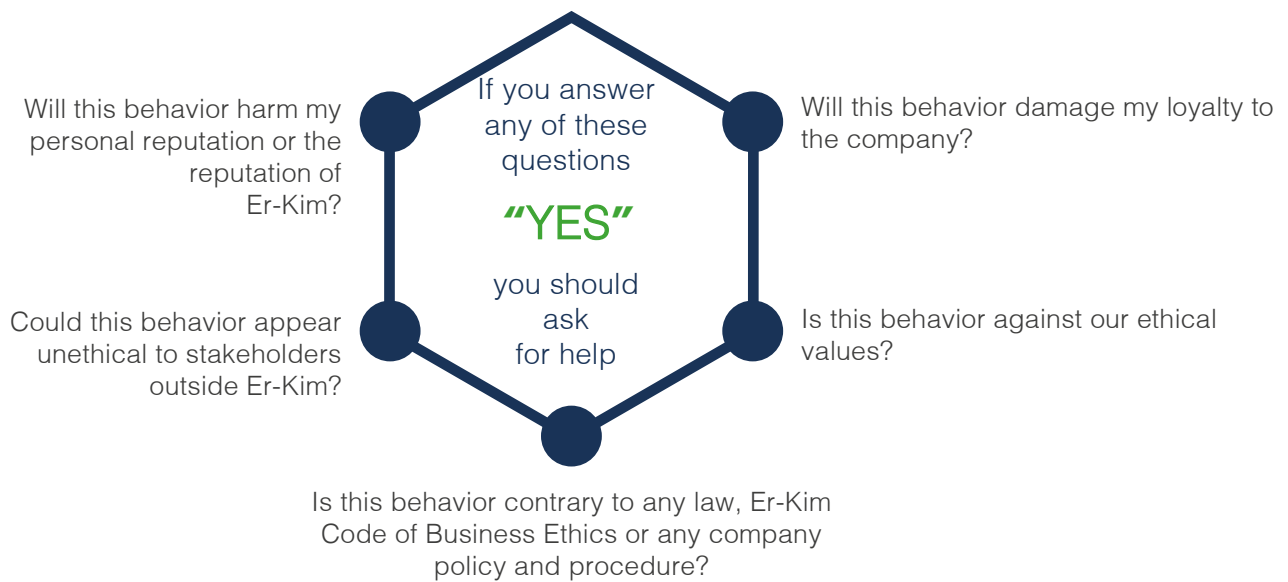
As Er-Kim Employees,

- ⦿ We are responsible for applying Er-Kim Business Ethics Principles in our daily work and decisions.
- ⦿ We have to read and understand the ethical principles that affect our daily work, the policies that arise from these principles and the procedures, laws and regulations that determine the implementation of these policies.
- ⦿ If we are uncertain, in doubt or have questions, we consult the relevant authorities or managers.
- ⦿ In case of any doubt regarding Ethics and Compliance processes, we share the situation with our Legal and Compliance Officer.
- ⦿ Er-Kim managers have additional responsibilities in the implementation of Er-Kim Code of Business Ethics.
- ⦿ As managers, we are responsible for creating an environment of harmony in our departments, implementing the principles and setting an example for all our employees.
- ⦿ We are responsible for ensuring that all our employees know the necessary rules and have completed compliance training.
- ⦿ As managers, as soon as we become aware of any violation of law, internal or external regulations, we are obliged to report it to our Legal and Compliance Officer.



Ethics Hotline

If you are going to make a difficult decision about a work-related issue, you should ask yourself these questions:



If you have any questions about the code of ethics in this guide or any Er-Kim policies and procedures, you can talk to your manager or Legal and Compliance Officer. If you suspect any violation, you can also ensure that the process is carried out through the ethics hotline.

How to Use the Ethics Hotline in Case of Ethical Principle Violation?

- ⦿ You can reach the ethics line. (E-Mail: etik@er-kim.com.tr - Phone: +90 212 401 59 19)
- ⦿ Your report will always be treated confidentially.
- ⦿ You can choose not to give your name.
- ⦿ Concerns raised in good faith will never go unanswered.
- ⦿ There is no question of retaliation.
- ⦿ Regardless of the reported situation, all cases will be handled with professionalism.
- ⦿ The Legal and Compliance Officer responsible for ethics cases will always follow up on reports.



All responsible Er-Kim managers and employees will answer all questions carefully and consider complaints in detail. Internal investigations will be conducted when necessary. Violations of the law, company rules or ethics revealed as a result of investigations may result in disciplinary action, up to and including dismissal. At the same time, especially with managers, failure to report inappropriate behavior to the appropriate authorities may lead to disciplinary proceedings.

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