



Berhan Pharma
Care in Every Shipment

Berhan Pharma PLC - Controlled Website Copy

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COMPREHENSIVE CORPORATE POLICY MANUAL

Effective Date: January 20, 2023

Approved By: Board of Directors

Signed By: Kirubel Getachew – Managing Director

SECTION 1 – FREEDOM OF ASSOCIATION & LABOUR STANDARDS

Policy Statement

Berhan Pharma PLC upholds the right of all employees to freely associate, form, join, or refrain from joining trade unions and workers’ associations in accordance with the Ethiopian Labour Proclamation No. 1156/2019 (Articles 113–118). We ensure that employees are not discriminated against or penalized for exercising these rights.

Implementation Measures

- Ensure all employment contracts explicitly recognize employees’ right to union membership.
- Prohibit retaliation, demotion, or dismissal based on union activity.
- Provide reasonable access to meeting spaces for lawful employee gatherings.

Monitoring & Enforcement

- HR to document all union-related interactions.
- Annual compliance review to verify no labour rights violations have occurred.

Non-Compliance Clause

Violation of this section will result in disciplinary action up to and including termination and, where applicable, referral to the Ministry of Labour and Skills (MoLSA) for legal action.

SECTION 2 – INCLUSION, DIVERSITY & ANTI-DISCRIMINATION

Policy Statement

Berhan Pharma PLC prohibits all forms of discrimination based on race, religion, gender, disability, political opinion, ethnicity, or age, in compliance with Ethiopian Labour Proclamation (Articles 14–15) and the Ethiopian Criminal Code.

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Implementation Measures

- Job advertisements use neutral, inclusive language.
- Recruitment panels to include more than one reviewer to reduce bias.
- Equal pay for equal work without gender or background disparity.
- Provide reasonable accommodation for employees with disabilities.

Monitoring & Enforcement

- HR to maintain records of recruitment and promotions for review.
- Anonymous reporting channels for discrimination complaints.
- Annual diversity audits with corrective measures.

Non-Compliance Clause

Any breach will result in disciplinary action, possible termination, and legal referral under the Ethiopian Criminal Code (Articles 486–492).

SECTION 3 – ENVIRONMENTAL RESPONSIBILITY

Policy Statement

Berhan Pharma PLC complies with Environmental Impact Assessment Proclamation No. 299/2002 and the Solid Waste Management Proclamation No. 513/2007, ensuring that business operations minimize environmental harm.

Implementation Measures

- Proper disposal of expired pharmaceuticals through EFDA-approved channels.
- Minimize packaging waste by using recyclable materials.
- Maintain spill control measures during storage and handling of chemicals.

Monitoring & Enforcement

- Annual environmental audits.
- Documentation of waste disposal certificates.

Non-Compliance Clause

Any environmental violation will lead to disciplinary action and legal reporting to the Ethiopian Environmental Protection Authority.

SECTION 4 – QUALITY MANAGEMENT

Policy Statement

Berhan Pharma PLC maintains quality standards in line with ISO 9001, ISO 13485, and EFDA

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requirements. All suppliers must hold ISO, CE, and EFDA certifications.

Implementation Measures

- Conduct supplier audits before approval.
- Maintain documented Standard Operating Procedures (SOPs) for product handling.
- Maintain full traceability of all products from supplier to customer.

Monitoring & Enforcement

- Annual supplier re-certification check.
- Internal product quality testing and complaint review logs.

Non-Compliance Clause

Failure to comply will result in supplier termination and legal reporting to EFDA.

SECTION 5 – OCCUPATIONAL HEALTH & SAFETY

Policy Statement

Berhan Pharma PLC ensures safe and healthy working conditions in accordance with Ethiopian Labour Proclamation (Articles 92–97).

Implementation Measures

- Provide personal protective equipment (PPE) at no cost.
- Conduct fire safety and emergency evacuation drills every 6 months.
- Maintain First Aid kits and trained responders on-site.

Monitoring & Enforcement

- Quarterly safety inspections.
- Incident reporting and investigation within 24 hours.

Non-Compliance Clause

Failure to comply will result in disciplinary action and, if serious injury occurs, referral to MoLSA and prosecution under Ethiopian Criminal Code.

SECTION 6 – SUPPLY CHAIN ETHICS

Policy Statement

All Berhan Pharma PLC suppliers must operate in accordance with ethical sourcing standards, including ISO, CE, and EFDA certification requirements.





Implementation Measures

- Pre-qualification checks for all suppliers.
- Supplier contracts must include ethics clauses.

Monitoring & Enforcement

- Annual supplier ethics audit.
- Immediate termination of suppliers violating ethical standards.

Non-Compliance Clause

Breach will result in contract termination and reporting to the relevant Ethiopian trade authority.

SECTION 7 – CONFLICT MINERALS POLICY

Policy Statement

Berhan Pharma PLC prohibits the sourcing of products containing conflict minerals that finance armed groups, in accordance with Ethiopian Trade Law and international best practices.

Implementation Measures

- Require supplier declarations on conflict mineral origin.
- Refuse any supplier unable to provide compliant sourcing proof.

Monitoring & Enforcement

- Annual review of supplier mineral sourcing certifications.

Non-Compliance Clause

Violation results in immediate supplier termination and legal reporting.

SECTION 8 – ETHICAL BUSINESS PRACTICES

Policy Statement

We maintain a zero-tolerance approach to bribery, corruption, and fraudulent activity in compliance with the Ethiopian Criminal Code (Articles 419–433).

Implementation Measures

- Mandatory ethics training for all employees.
- Clear reporting procedures for suspected misconduct.

Monitoring & Enforcement

- Annual ethics compliance audit.

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Non-Compliance Clause

Violation results in termination and criminal prosecution.

SECTION 9 – COMMUNITY IMPACT & COMPLIANCE

Policy Statement

Berhan Pharma PLC engages in corporate social responsibility aligned with Ethiopian community needs.

Implementation Measures

- Support public health programs.
- Partner with local universities for training and research.

Monitoring & Enforcement

- Annual CSR activity review.

Non-Compliance Clause

Failure to fulfill community commitments may result in internal review and corrective action.

SECTION 10 – POLICY REVIEW & ENFORCEMENT

This policy is reviewed annually by the Board of Directors.

Non-compliance in any section may lead to termination and referral to Ethiopian authorities.

Signed & Approved

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Kirubel Getachew
Managing Director, Berhan Pharma PLC
Date: January 20, 2023