



**MONTENEGRO
INSTITUTE FOR MEDICINES AND MEDICAL DEVICES**

ETHICAL CODE

Podgorica, December 2022

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Pursuant to the Article 19 of the Statute of the Institute for Medicines and Medical Devices, the Steering Committee of the Institute for Medicines and Medical Devices hereby issues

ETHICAL CODE

General provisions

Article 1

Ethical Code (hereinafter: Code) shall define standards of conduct that employees of the Institute for Medicines and Medical Devices (hereinafter: the Institute) are required to follow in performing the Institute's activities.

Employees shall apply principles determined by the Code in relations with the Institute's parties and citizens, in mutual relations, in relation to work and toward the Institute, to other legal and natural persons and state and public authorities.

Provisions prescribed by this Code are rules that employees must adopt as their own principles and personal standard of conduct at the Institute. Achievement of the highest ethical standards of personal conduct is a personal responsibility and task of every employee.

Managing Director of the Institute, members of the Managing Director's Cabinet and heads of organizational units are obliged to act in order to prevent violations of the provisions of the Code. Superiors shall encourage efficient tasks performing by employees, appreciation, respect and cooperation, and appropriate attitude towards clients and other persons.

Provisions of the Code shall also apply to persons who have established an employment relationship through appointment, i.e. nomination at the Institute.

Expressions used in this Code for natural persons in the masculine gender shall mean the same expressions in the feminine gender.

Article 2

Goal of the Code is promotion and adoption of ethical, moral and professional principles and generally accepted civilizational values in the employees' conduct, with the aim of achieving the common good and public interest, as well as achieving the trust of parties, citizens, expert and general public in the activities and work of the Institute.

All employees are obliged to comply with provisions of this Code, and any behavior contrary to the provisions of this Code may constitute a violation of work obligations in accordance with the Law on the Labor and the Collective Agreement of the Institute.

Respect for legality

Article 3

Employees shall perform their duties within their authorizations, in accordance with the Law and other regulations and shall act in accordance with professional standards and provisions of this Code.

Employees who are authorized to make decisions in the Institute shall act within the scope of given authorization, guided primarily by the principle of legality and public interest when making decisions.

Employees shall perform their duties in an impartial and politically neutral manner.

In relations with parties, superiors, subordinates and other employees, one shall behave politely, with due diligence and respect, while respecting the principles of business morality, business and professional ethics and interpersonal communication ethics.

Professionalism in work

Article 4

Employees are obliged to perform the duties prescribed by the job description conscientiously, in a timely and efficient manner, in accordance with the highest professional and business standards.

Employees are obliged to protect their personal reputation, reputation of the Institute and in no way may their actions jeopardize the reputation and trust in the work and decisions of the Institute.

Employees are obliged to act in accordance with public interest, and belonging to interest groups and/or political parties must in no way influence the impartial and professional conduct at work.

Employees must not use official information about activities and work of the Institute for illegal purposes, nor disclose business secrets learnt in the course of performing their duties.

Communication between employees and clients shall be based on reliability, confidentiality, politeness, seriousness and availability.

All communication forms between employees shall be based on mutual respect, trust, cooperation, courtesy, responsibility and patience. Employees exchange opinions and information on professional affairs and do not interfere with each other's work.

Employees are obliged to be neat and appropriately dressed for business during working hours and during the performance of tasks related to work at the Institute.

When performing private tasks, an employee must not use official symbols or refer to the authority of the workplace in the Institute.

Equality, righteousness and respect for integrity and dignity

Article 5

When performing their duties, employees are obliged to treat all natural and legal persons equally, respect human rights and minority rights, integrity and dignity of persons, without discrimination or privilege based on age, nationality, ethnicity or social affiliation, language or racial origin, political or religious beliefs or preferences, disability, education, social status, gender, marital or family status, sexual orientation or on any other basis.

Institute shall ensure that all employees have the right to be respected as persons, in accordance with guaranteed rights to life, integrity and dignity, as well as the right to privacy.

Prohibition of acquiring material or other benefits and prevention of conflicts of interest

Article 6

When performing their duties, employees must not abuse their authority and position for the purpose of obtaining material or other benefits for themselves or another natural or legal person.

Employees are obliged to conduct in a manner that discourages clients and other persons from offering gifts or services.

Employees must not accept direct or indirect gifts, except for protocol and appropriate gifts.

A gift shall include things, rights and services given without compensation, which affect or may affect impartiality in performance of work and decision-making. Gifts of money, regardless of the amount, must always be refused.

A protocol gift is a gift from a representative of another country or an international organization that is given during visits, or on other occasions, as well as other gifts given on similar occasions.

A gift worth up to 50 euros is considered an appropriate gift. If an employee receives several occasional gifts from the same donor during one year, the total value of these gifts must not exceed the amount of 50 euros, and if during mentioned period one receives occasional gifts from several donors, the value of these gifts must not exceed the amount of 100 euros.

Any alienation, embezzlement, damage or destruction of the Institute's property, irregular usage and neglectful attitude towards work, as well as unauthorized usage, is prohibited. Protection and proper use of all Institute's resources is the responsibility and obligation of each employee.

In order to ensure transparency and objectivity in decision-making processes within the competences of the Institute, employees are obliged to permanently conduct measures and procedures to prevent the existence of conflicts of interest.

Article 7

When establishing an employment relationship at the Institute each employee shall sign a statement on the absence of conflict of interest.

When signing the statement on the conflict of interest, employees are obliged to state all the facts related to possible conflict of interest and impartiality in the work with the aim of preserving the integrity and impartiality in the work of the Institute.

Any information withholding related to the conflict of interest and providing untrue information in a statement about a conflict of interest entails disciplinary liability for a serious violation of the work obligation.

With the aim of avoiding conflicts of interest in the performance of work duties, an employee shall:

- become familiar with any potential or actual conflict of interest;
- take necessary actions to avoid conflicts of interest;
- inform the supervisor in writing of any possible or actual conflict of interest and state the nature, characteristics and scope of the conflict of interest;
- ask for the exemption from duties that may result in a conflict of interest, as well as from liability, if one is not exempted from performing duties in question;
- act in accordance with the decision of the superior, which exempts him/her from performing tasks that may result in a conflict of interest.

Article 8

All employees are obliged to report changes that may affect the existence of conflicts of interest and their impartiality and objectivity in performing tasks and making decisions.

Public appearances

Article 9

Managing Director of the Institute, the spokesperson of the Institute, as well as other employees authorized by the Managing Director shall communicate with journalists and the media on behalf of the Institute.

In all public appearances, employees are obliged to take due account of their personal reputation and the reputation of the Institute and may not present information that would constitute a violation of the duty to keep business secrets.

Whenever engaged in public appearances (e.g. giving speeches, lectures, workshops, publication of texts, media appearances) in which they represent the Institute, employees are obliged to express the Institute's views in accordance with the Law, obtained authorization, verbal and written instructions of the superiors, expert knowledge and provisions of this Code.

Employees must emphasize that they express personal views when engaged in public appearances in which they do not represent the Institute and which are in any way connected to the affairs within the Institute's scope of work or may affect the Institute's reputation.

Conduct in the workplace

Article 10

In performing tasks related to deciding on the rights, obligations and legal interests of a party, employees shall not act outside the established rules and procedures.

In performing tasks, in relation with parties, an employee is obliged to:

- act in a correct manner, politely and respectfully, and to base his/her attitude on objectivity and impartiality;
- act professionally and constructively, showing interest and patience;
- provide information in a timely, correct and accurate manner, in accordance with the law and other regulations;
- provide information on the competent authorities for processing the applications, as well as on the legal means prescribed for the protection of rights and interests;
- apply provisions of equality, fairness and respect for integrity and dignity.

Article 11

Employees must not perform paid or unpaid work that is inappropriate or that would harm the reputation and interests of the Institute.

In case when an employee is not able to assess by himself/herself whether the performance of certain tasks outside the Institute will harm the reputation and interests of the Institute, it is necessary to contact the superior and the Managing Director of the Institute in writing for advice.

Employees shall conduct in such manner that public trust in impartial and efficient work of the Institute is preserved and improved.

Employees shall restrain from conduct that may have a negative impact on the reputation of the Institute outside working hours.

Article 12

Employees who believe that they are required to act in a manner that is illegal, inappropriate, unethical or otherwise not in accordance with the Code, shall report such request to his superior in writing and act in accordance with the law.

Employees are obliged to report to the supervisor in writing any violation of regulations, as well as of the rules and principles of the Code by other employees.

Employees shall not request compensation for the performance of duties for which compensation is not prescribed in accordance with the law.

Article 13

Supervisor shall point to the misconduct of the employees whose work they manage and take appropriate measures in relation to actions that are not in accordance with the provisions of the Code.

Superior shall emphasize the importance of regulations and rules and set an example for proper ethical conduct of employees with their own personal conduct.

Supervisor shall take necessary measures to prevent corruption or other forms of illegal behavior.

In the relationship with employees in the performance of duties a superior shall do the following:

- act in a correct manner, diligently and respectfully;
- take utmost account of employees' opinion;
- provide protection against threats, attacks and other actions that violate the integrity of employees;
- protect privacy;
- dedicate to constant care of professional education, professional training and development, advancement, work culture and constant improvement of the working conditions of employees;
- ensure the conduct of the employee in accordance with regulations, implemented standards and provisions of the Code.

Article 14

Employees shall plan their working hours and respect the working hours of other employees, and conduct in a manner that does not affect the efficiency of the work of other employees and reduction their own work performance.

Article 15

Employees shall behave in the workplace in accordance with the following rules:

- respect working hours, scheduled meetings and other obligations. If the delay cannot be avoided, they are obliged to inform the superior on it;
- in case of illness, it is necessary to inform superiors on it in accordance with Article 19 of the Code;
- raised voices are not allowed, one shall conduct politely, even when having discussions or disagreements;

- if inappropriate behavior occurs on the part of another colleague, one shall not reciprocate, but speak politely with a person in question, and if the inappropriate behavior continues, one shall report it to the manager or superior;
- conversations with colleagues or on the phone shall be done in a low tone so as not to disturb colleagues in the office;
- avoid habits that could disturb colleagues (e.g. clicking with a ballpoint pen, making tapping sounds and other unnecessary noise);
- mobile phone shall be with a a volume turned down and close to the user so as not to miss the call;
- phone calles via speakerphone shall only be carried out if it is necessary for other colleagues to participate in the conversation, and persons on the other end shall be informed on it;
- inappropriate and rude words, as well as unnecessary loud speech shall be avoided;
- property of the Institute and other colleagues shall be respected;
- workplace shall be kept neat and clean;
- having pesonal conversations at the workplace shall be avoided.

It is necessary to do the following in the common areas:

- maintain the hygiene of the premises and always leave them clean, and if this is impossible due to a malfunction, it is necessary to notify the person in charge of technical affairs and maintenance;
- treat all property and premises of the Institute with due care and in case of noticing irregularities, report them to the porter or superior;
- use the air conditioning system (heating/cooling) adequately and, if the workspace is shared, take care of other colleagues in the office;
- perform short-term ventilation of the rooms during the operation of the air conditioning system.

Keeping records

Article 16

All employees of the Institute and individual employees of companies with which a contract for the provision of services has been concluded have an electronic card for access control at the facility level (external entrances and certain rooms within the facility) as well as for presence records, which is issued personally and in the name of the user by the Institute.

Institute possesses a technical system for access control and presence records managed by the Department for IT and Technical Affairs.

All employees are obliged to log in by placing their ID card on the reader (external reader at the main and staff entrance), i.e., to log out by selecting the button on the internal reader with the reason for leaving work (private, business, break, end of working hours), and then by placing the ID card to the reader located on the inside at the main and staff entrance.

Use of ID cards is mandatory during any exit from the Institute during working hours. This also applies to leaving work that is short.

If an employee is unable to log in/log out due to current lack of card, with the aim of appropriate presence record, one shall do the following:

- immediately upon arrival, send an e-mail to the supervisor and the head of the Department for IT and Technical Affairs, stating the time of arrival and providing the reason for not recording it;
- at the end of working hours, i.e. before leaving the workplace, send an e-mail to the supervisor and the head of the Department for IT and Technical Affairs, listing the time of leaving along with all entries/exits for the day in question.

The e-mail referred to in paragraph 5 of this Article must be sent immediately after arriving to work and immediately before leaving work, in order to confirm the employee's claims about the time of arrival and leaving. Based on the described communication, the head of the Department for IT and Technical Affairs will manually record entries/exits with indicated times for the employee in question in the presence record system.

In case of damage or loss of the card, employees are obliged to notify the head of the Department for IT and Technical Affairs immediately.

The employee from a company with which the Institute has signed a contract on the provision of physical security services (porter) is obliged to monitor whether entry/exit records have been made appropriately, and in case of noticed irregularity, remind employees of the obligation to log in/log out.

Absence from work due to business obligations

Article 17

If the employees have a business obligation which requires leaving the Institute during working hours, they are obliged to inform their manager about this via e-mail, providing the information on the reason and estimated time of absence. Managers, or employees in the manager's absence, are obliged to inform the Managing Director's Cabinet in the same manner. When leaving, one is obliged to select the reason for leaving on the reader and log out with his/her ID card and then log in again after returning.

Absence from work due to private matters

Article 18

If the employees have a private matter that requires leaving the Institute, they are obliged to inform their manager about it via e-mail, and to select the reason for leaving the reader and log out with his/her ID card and then log in again after returning.

Employees are obliged to make up the time lost due to reasons referred to in paragraph 1 of this Article.

Absence from work due to temporary incapacity for work

Article 19

Employees are obliged to submit, in person or through another person, a medical doctor's statement, in accordance with the Law, no later than three days from the date of commencement of temporary incapacity for work. The statement shall be submitted and filed at the Registry Office.

In relation to ended sick leaves, the report for the calculation of the salary for the period of temporary incapacity for work shall be submitted by the 25th day of the month, and in other cases no later than five days after ending. The report shall be submitted and filed at the Registry Office.

Other absences

Article 20

Other absences, i.e. lack of working hours, are taken into account when calculating the salary for a specific accounting period.

Creating reports on presence at work

Article 21

At the end of the accounting period for salaries, the managers of the departments and centers shall perform an analysis of the work presence for each employee from the organizational unit. Taking into account the number of working hours and approved absences, the manager shall inform the manager of the Department for Economic Affairs about employees who do not have enough working hours, so that the salary can be calculated adequately.

Deputy Managing Director shall carry out the analysis of presence at work referred to in paragraph 1 of this Article for managers of organizational units and employees in Managing Director's Cabinet.

Insufficient number of working hours directly affects the calculation of the salary (the mandatory working norm is 40 hours per week, i.e. 8 hours x the number of working days in a month in question, minus a 30-minute break during the working day), in accordance with the law.

Any misuse of ID cards (giving them to another person, etc.) is prohibited.

Eating at work

Article 22

Eating at work at the Institute is allowed only during the break.

Eating is allowed only in the area designated for that purpose (kitchen and the rest area in the loft).

It is forbidden to take food and/or drinks from other employees, the refrigerator must be cleaned and food must not be left in the refrigerator for too long.

Workplace appearance

Article 23

Employees are obliged to be appropriately dressed at the workplace and not to damage the reputation of the Institute by their way of dressing, nor to express political or other affiliations that may affect other employees or the performance of work duties.

Inappropriate clothing shall mean the following:

- transparent clothing and clothing with plunging neckline;
- clothing with striking prints;
- inappropriate footwear, sports shoes, flip-flops, slippers, etc.;
- dresses with straps, tank tops, unless a jacket, scarf, etc. is worn over them.;
- skirts shorter than 5 cm above the knee, short skirts, short pants, leggings;
- multicolour, ripped jeans and jeans with striking prints.

Protection of employees

Article 24

Institute is obliged to provide the employee with work at the workplace and in the working environment under conditions that ensure respect for their dignity, integrity and health, as well as to take necessary measures to protect the employee from abuse at work and in connection with work in accordance with the Law (hereinafter text: mobbing). This protection shall also include taking preventive measures.

Any kind of discrimination in the workplace is prohibited, in accordance with labor regulations.

Harassment and sexual harassment at work and in connection with work is prohibited.

Any form of mobbing is prohibited, i.e. any active or passive behavior at work or in connection with work towards an employee or a group of employees of the Institute that is repeated and aims at or represents a violation of the dignity, reputation, personal and professional integrity of employees and that causes fear or creates a hostile, humiliating or offensive environment, worsens working conditions or causes the employees to isolate themselves or induces them to terminate their employment contract or other contract on their own initiative.

It is forbidden to incite or lead others to behave in a manner referred to in paragraph 4 of this Article.

Behavior of employees which represents mobbing shall mean a violation of the work obligation.

Ethical conduct promoting

Article 25

Institute shall promote ethical conduct in mutual relations of employees, and the relations of employees with clients.

In order to promote ethical conduct, the Managing Director of the Institute can appoint a person responsible for ethics who will provide training to all employees in order to promote ethical behavior, receive complaints from employees and parties about unethical conduct and conduct of employees, carry out the procedure for investigating the merits of the complaint and keep records of received complaints.

Article 26

Managing Director's Cabinet and heads of organizational units are responsible for the implementation of the Code.

All employees of the Institute shall confirm with their signature that they are aware of the provisions of the Code.

Article 27

This Code enters into force on the day of its adoption by the Steering Committee.

No: 3020/22/430/7-8614
Podgorica, 27 December 2022

President of the Steering Committee

Dr subspec. Vasilije Đurašković