



CODE OF CONDUCT

Schaffhausen, January 2019

CONTENT

1. WELCOME TO OUR CODE OF CONDUCT	
1.1 Message from the President of the Board of Directors and CEO	3
1.2 Message from the Compliance Officer	4
2. OUR COMMON OBJECTIVE	5
3. OUR VALUES	6
4. CORPORATE BEHAVIOUR	
4.1 The Headline Test	7
5. DOING BUSINESS WITH INTEGRITY	
5.1 Antibribery and Anticorruption	8
5.2 Unfair Competition	8
5.3 Conflict of Interest	9
5.4 Public Procurement and Tenders	9
5.5 Grants, Donations, Gifts and Hospitality	10
6. PATIENT FOCUS	
6.1 Medical Affairs	12
6.2 Interactions with Patients	12
7. INTERACTIONS WITH HEALTHCARE PROFESSIONALS	
7.1 Engaging Services of Healthcare Professions	13
7.2 Interactions relating to promotion of our products	13
7.3 Promotion of our products	14
7.4 Distribution of samples	14
8. QUALITY AND SAFETY OF PRODUCTS	
8.1 Quality and Pharmacovigilance	15
9. SUPPORTING OUR PEOPLE AND TEAM SPIRIT	
9.1 Support in the workplace	16
9.2 Respect in the workplace	16
9.3 Health and safety in the workplace	16
10. MANAGING INFORMATION	
10.1 Books and Records	17
10.2 Asset protection and confidentiality	17
10.3 Data privacy	18
10.4 Transparency	18
11. SPEAKING UP	
11.1 Reporting concerns	19
12. OUR CODE	
12.1 Acceptance of our code	20

Ewopharma AG reserves the right to modify any aspect of the Compliance Program, including, without limitation, this Code and company policies, at any time, for any reason, and with or without notice. If there is a conflict between this Code and a specific policy, the specific policy currently in effect will govern. The version of this Code posted on our website will contain any changes made after the date of the printed publication and will be the most current version of the Code. The Code is available on www.ewopharma.com.

MESSAGE FROM THE CEO

Dear Colleagues

I would like to welcome you to the Ewopharma Group.

Together we are responsible for cultivating the long-term partnerships we enjoy with our business partners and customers. This spirit of partnership shapes every aspect of our company.

Ewopharma is a reliable owner-managed employer of highly skilled, motivated and loyal employees for which we care. By getting the right help and practical guidance, our senior managers become good leaders and ambassadors. Empowerment of our employees to be open minded and take on challenges is important to us as is the acknowledgement of individual responsibility for our actions and representing Ewopharma in the best possible way.

We provide frequent updates about our group and local country activities. We effectively communicate clear guidelines within which to meet our corporate objectives; under the umbrella of a common and unique identity in an environment based on mutual respect.

The reputation and perception of Ewopharma is only worth our behaviour. It is our core values that will guide us and help us make the right decisions for Ewopharma as we go about our daily tasks.

These tasks are governed by a sense of fairness, trust and the desire to deal with others on an equal footing.

Thank you for living and upholding the values of the Ewopharma Group.

With best regards



Alain Staub
President of the Board of Directors and CEO
Ewopharma Group



MESSAGE FROM THE COMPLIANCE OFFICER

Dear Colleagues

When you join the Ewopharma family you agree to uphold Ewopharma to the highest legal and ethical standards. To do this to the best of your ability you must embrace our core values of loyalty, tradition, responsibility, passion and Swissness.

Compliance must not become a tick the box exercise. Diligent planning and ethical decision making are key components to ensure that our programme is effective and not only helps us achieve our common business objectives but strengthens our reputation with our partners, customers and patients. As business practices evolve and interaction with patients becomes more important to ensuring that we bring the right products to meet unmet medical needs so to does the risk that our business practices are seen to be influential and not respecting the doctor patient relationship.

In today's challenging environment our responsibility and accountability to business partners, customers and patients is now more important than ever.

We owe it to our partners, customers and patients to show that all our business practices are properly planned, justified and well thought out. We are committed to working in an ethical way at Ewopharma. Our compliance programme is driven from the top and ensures that there is no confusion about key messages that will help us to achieve our goals and create a sustainable company. Our code, policies and procedures ensure we have a process to plan and document our interactions with Healthcare Professionals, Public Officials and Patient Organisations.

When you join Ewopharma you do not travel our compliance journey alone, we are here to train, support, offer advice to you whenever you need it and during scheduled training sessions. During our review and monitoring process we also provide guidance on how our programme can be enhanced or further improved.

If you are not happy about an activity at Ewopharma, then you have the responsibility to "speak up" and report in good faith any potential violations. All reports will be reviewed and investigated. We seek to maintain the confidentiality of reporting employees unless disclosure is otherwise required for conducting effective investigation or by law.



At Ewopharma we are a trusted partner and each and everyone of us has a responsibility to ensure that our success is built on the foundations of our values.

Thank you for reading and living up to Our Code of Conduct.

With best regards

A handwritten signature in blue ink that reads "Marina Reilly". The signature is fluid and cursive.

Marina Reilly
Compliance Officer
Ewopharma Group

OUR COMMON OBJECTIVE

What we want to be

Ewopharma is the innovative partner for the marketing of pharmaceuticals and consumer health products in Switzerland and Central Eastern Europe.

"We are ensuring our success as an independent, owner-managed company by systematically expanding our specialty pharma and consumer health business. We are also strengthening our hospital business in the interest of diversification and increasing returns."

Alain Staub, President of the Board of Directors and CEO

What we do

Our state-of-the-art market access and marketing capabilities enable us to access and develop new markets with innovative, reliable, high-quality therapies and products.

"Team spirit is alive at our company and all of us do our part to develop and cultivate these core competencies."

What we offer

We systematically improve our Rx range in addition to our own brands and those of our partners. We promote the consumer health side of our business through the targeted marketing of our own brands and of a selection of strong partner brands.

"Ewopharma is and will remain a strong Rx company and strengthens its position with the launch of new break-through therapies. In developing a second business unit in consumer health, we are taking advantage of market opportunities and securing our position in the market."

What is important to us

Customers and partners

Reliability, quality and empowerment shape every aspect of our company. We are professional and competent in our dealings with our customers and business partners.

"As a Swiss company, we uphold our values; they set us apart at all of our national subsidiaries – they are the standards by which we wish to be judged."

We strive to cultivate long-term relationships with our business partners and customers. The spirit of partnership shapes every aspect of our company.

"Our actions are governed by a sense of fairness, trust and the desire to deal with others on an equal footing."

Employees

We are a reliable employer of highly skilled, motivated and loyal employees. Our employees take on challenges and appreciate the scope for independent action available to them. We support them in their professional development to the best of our ability.

"Nurturing and requiring, like giving and taking, are values central to Ewopharma's culture."

Management

At our headquarters, the central management lays down guidelines for action – the national subsidiaries exercise their discretion in achieving local objectives and by doing so advance the entire enterprise.

"We agree on challenging objectives and provide scope for independent action by delegating responsibility and authority."

Communication

We provide information internally and externally, in a straightforward, timely and understandable manner.

"We promote and require the exchange of experiences among the countries. We make information available quickly and whenever it is required."

OUR VALUES

It is important to Ewopharma to meet annual performance objectives and specific targets. We expect our employees will make sound judgements and good choices for our company. Each of us must accept this commitment, to act with integrity.

The Ewopharma Group is only worth as much as the behaviour conducted by each of its employees in their daily life. Our defined values will guide us more precisely to meet the benchmark and maintain and improve Ewopharma's reputation as a whole.

Swissness

As a Swiss company, we strive to embody the values associated with our country and people. We do what we say by adhering to deadlines and agreements made, as well as providing high-quality, reliable performance with excellent quality. Just like Switzerland, we bring together the stability afforded by our long history and the flexibility ensured by a modern agile approach and efficient decision-making processes.

Passion

Our company was created out of passion and continues to channel this into its work today. Our teams love what they do and are happy to go the extra mile for our partners. This enthusiasm fosters the "nothing is impossible" attitude that has gotten us to where we are today and will continue to help us grow in the future.

Responsibility

At Ewopharma we are aware of the responsibility we carry in doing the work we do – not only towards our partners but towards the patients that need the treatments we market. We place great value on ethical business conduct and provide our teams with the education and training they need to complete their work in full compliance with internal and external rules and regulations.

Tradition

Our long history has given us a wealth of experience and expertise that has secured our success in the past and the present and will continue to do so in the future. We strive to create long-term partnerships in order to grow together with our partners for our mutual benefit. In this dynamic industry, we honour tradition yet understand the importance of evolution – for Ewopharma and our partners.

Loyalty

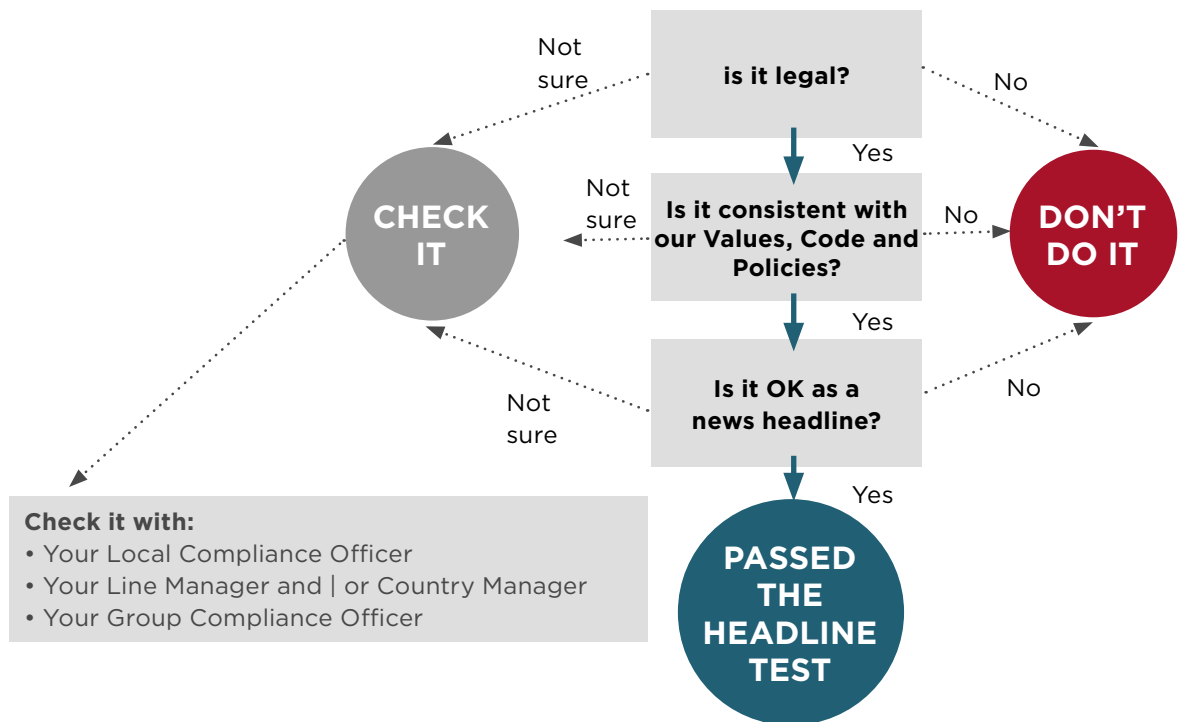
We are proud of the loyalty of our employees. Ewopharma values different cultures and beliefs and strives for a working environment that brings out the best in everyone. This makes for fruitful collaborations based on trust where communication takes place on an equal footing. We believe that this is the basis for long-term partnerships that are beneficial for all parties involved.

CORPORATE BEHAVIOUR

THE HEADLINE TEST

Sometimes it can be difficult to know what to do in certain circumstances. If we are unsure or uncertain about our actions, the use of the Headline Test will question the soundness of our actions and make us think about the consequences of inappropriate actions; for ourselves, our colleagues, business partners, customers and patients.

The Headline test says: Before we decide, we consider how it would look if it appeared as a headline in a newspaper or in any other public media – knowing that improper actions which make 'Headline News' or Breaking News' could potentially damage our future.



DOING BUSINESS WITH INTEGRITY

ANTIBRIBERY AND ANTICORRUPTION

We are committed to conducting our business to the highest standards. We comply with applicable legislation and ethical standards outlined in pharmaceutical industry codes.

At Ewopharma we do not:

- Provide bribes or incentives to win business, to influence a business decision or a prescribing decision or to advance our interests with government authorities.
- Provide gifts or entertainment to government officials, employees of government enterprises, nor employees or representatives of other companies, that are not in accordance with applicable laws, regulations and internal travel and expense policy's.
- Use agents, consultants and distributors unless we have carried out appropriate and proportionate due diligence to ensure that our commissions or fee arrangements are not used as bribes on our behalf and that they do not engage in other prohibited activities on our behalf.
- Permit facilitation payments. These are small, sometimes nominal, sums requested to expedite the performance of a routine function (e.g. customs clearance or the grant of a license).

UNFAIR COMPETITION

Ewopharma complies with all laws that protect free enterprise and fair competition.

We do not communicate with competitors about business matters such as prices, costs, profits, product capacity, volume, market share, sales territories, allocation of customers or any other terms or conditions of sales that could create the appearance of improper agreements or arrangements that aim to coordinate market behaviour.

All employees receive training on Competition Law enabling them to recognise competition issues and when to seek guidance from the Legal Department.

For more information please refer to Ewopharma's Competition Law Guide.

CONFLICT OF INTEREST

Ewopharma employees will always make business decisions in the best interest of the company and not based on personal or other business interests. Acting in the best interest for Ewopharma includes:

- avoiding situations that would impair our ability to make objective business decisions on behalf of Ewopharma;
- discussing with your line manager any situation that could be perceived as a potential conflict of interest;
- proactively addressing situations that may put our interests or those of a family member in potential conflict with Ewopharma;
- Assessment and documentation of the potential conflict of interest situation by the Country Manager and Local Compliance Officer.

When entering into agreements with third parties Ewopharma will always ensure, by written acknowledgment from that third party, that they disclose if there is a potential conflict of interest that would impair the working relationship.

PUBLIC PROCUREMENT AND TENDERS

The tendering process will never be used to pass benefit to government officials. Ewopharma does not engage in interactions with government officials outside of the tender process itself. Ewopharma does not consider it appropriate to provide gifts and hospitality to government officials.

Supporting documentation in relation to the tender submission; pricing, discounts offered, and the tender outcome is maintained and retained in the interest of transparency and fairness.

Third party service providers will be approved in line with Ewopharma's internal procedure on the Approval of Outsourced Activities Management. Ewopharma requirements for tendering products will be outlined in written contracts with third parties.

GRANTS, DONATIONS, GIFTS AND HOSPITALITY

Grants and donations are given to not for profit organisations in the spirit of good corporate citizenship. Ewopharma does not expect a return when it approves grant and donation requests.

Ewopharma is committed to supporting healthcare and healthcare research wherever possible. For this purpose, we may accept a request from a not for profit organisation (e.g. healthcare organisation or a patient organisation) to support it by giving them a grant or donation. Any such grant or donation is solely for the betterment of patients and may be in the form of educational, research or employment grants and donations or donation of equipment.

Grants and donations will not be provided to influence prescriptions, formulary positioning, recommendation or use of a product by the recipient. Grant and Donation requests will always be at arm's length and not solicited by our company. Grants and Donations are reviewed by the Local Compliance Officer and Country Manager, independent from the sales and marketing department.

Ewopharma do not offer or accept incentives, including but not limited to donations, gifts, entertainment or any other financial benefit for the purpose of unduly influencing the recipient's judgement or decisions, whether it is a business partner, vendor, supplier, healthcare professional, government official or other third party.

Personal gifts to healthcare professionals and government officials are prohibited.

Business courtesies such as meals or travel expenses, are permissible provided they are directly related to a legitimate business purpose, based on local standards and in line with Ewopharmas local country Travel and Expenses policy.

Small promotional items related to the practice of medicine and pharmacy are sometimes permitted once they are nominal in value. Such items are recorded in a promotional item register and signed by the Country Manager and Local Compliance Officer.

The giving or accepting of gifts and hospitality must adhere to the Code and Ewopharma's policies and procedures.

For more information please refer to SOP Anti Bribery and Corruption; Events; Grants and Donations; Honorarium; Sponsorship.



**YOUR
BRIDGE
TO NEW
MARKETS**

PATIENT FOCUS

MEDICAL AFFAIRS

Ewopharma has a dedicated Medical Department whose primary role is to provide Ewopharma with expert medical and scientific information directly related to therapeutic areas that interest Ewopharma. Its purpose is to ensure safe and appropriate use of Ewopharma products and build awareness of disease, medical needs and products.

The Medical Department coexists with, but is independent from, Ewopharma's business development and sales and marketing departments. The Medical Department is guided solely by medical needs of the patient and its activities are scientific and non-promotional in spirit and intent. This distinction ensures that credibility, trust and integrity remain at the forefront of Ewopharma products and services.

For more information please refer to GSOP Medical Information; GSOP Interventional Clinical Trials; GSOP Non-Interventional Post Authorisation Studies.

INTERACTIONS WITH PATIENTS

Ewopharma always respects the relationship between the patient and healthcare professional. There are occasions when we may support unmet medical needs in the therapeutic areas we work within. The need may arise due to the administrative or procedural requirements of a healthcare system; or, due to poor funding of a healthcare system in a country. Ewopharma will work collaboratively with Patient Organisations, Healthcare Professionals and Healthcare Organisations in our common area of interest which is to support patients.

Ewopharma are aware that direct to consumer advertising of medicinal products is forbidden in the countries we operate.

Our interactions with patient associations and patient advocates will always be ethical and respect the independence of the patient association and advocate.

Provision of financial support will always be aimed at supporting the mission of the patient association or meeting an unmet medical patient need. To foster transparency in our interactions we will always document our support in a written agreement.

For further information please refer to Policy on Patient Initiatives.

INTERACTIONS WITH HEALTHCARE PROFESSIONALS

ENGAGING SERVICES OF HEALTHCARE PROFESSIONS

Ewopharma will only engage the services of healthcare professions where there is a clearly defined business need and legitimate purpose to do so. The selection of healthcare professionals to be engaged by us is based only on factors such as their qualifications, experience, location, and availability. Selection shall never be based on influencing the healthcare professional to initiate or increase prescription of our products.

For example, Ewopharma have engaged the services of healthcare professionals: to speak at an event organised by Ewopharma relating to their expert therapeutic area that Ewopharma has an interest in; and to sit on an advisory board to provide us with expert advice on a therapeutic area of interest to Ewopharma.

When engaging the services of healthcare professionals we do not pay more than the fair market value for the services provided. We do not offer incentives, including but not limited to donations, gifts, entertainment or any other financial benefit with a view to the recommendation, the prescribing or the sale of Ewopharma products.

Ewopharma's interactions with healthcare professionals will always focus on the benefit to patients and will adhere to this Code and Ewopharma's policies and procedures, which all reflect applicable laws and industry codes.

INTERACTIONS RELATING TO PROMOTION OF OUR PRODUCTS

Ewopharma employs highly qualified Medical Representatives, most of whom have a university degree in medicine or pharmaceuticals. Each representative is responsible for a specific region and product group within their country. In countries where it is permitted, they pay regular visits to hospitals and specialist clinical centres to discuss products with physicians. We are committed to ethically promoting our products and services and recognise the importance of providing healthcare professionals with the accurate scientific and medical information they need to make informed prescribing decisions.

For further information please refer to Global SOP's Organizing Events; Honorarium; Promotion of Medicinal Products; Fair Market Value; Transparency and Disclosure of Transfers of Value to Healthcare Professionals; Antibribery and Anticorruption.

PROMOTION OF OUR PRODUCTS

Ewopharma ensures the requisite product registrations and notifications are in place in the territory before promotion commences.

The Marketing Authorisation (MA) covers all the main activities associated with the marketing of a medicinal product.

We comply with all local laws and regulations governing the promotion of our products. Although these laws and regulations may vary by region, Ewopharma has adopted the following principles for all promotional and marketing-related activities:

- We promote our Products in a manner consistent with the approved product characteristics or indications.
- We make truthful, accurate, balanced, fair, objective and complete claims.
- We do not promote drugs for off-label indications, uses, doses or populations.
- We do not provide any items or services to inappropriately influence or induce the use or recommendation of our products.
- We use promotional materials and other product information which has been approved through our internal review procedure and that of our partners.
- We do not overstate the efficacy of our products.
- We do not downplay or misrepresent the risks associated with our products or safety information.
- We comply with the Local Codes of Marketing Practices in the countries where we do business.

For further information please refer to Global SOPs Marketing Practices and Risk Management; Promotion of Medicinal Products; Approval of Promotional Materials.

DISTRIBUTION OF SAMPLES

We do not provide samples to unduly encourage recommendation, prescription, purchase, supply, sale or administration of our products. Samples may only be provided for the purpose of acquiring experience in dealing with the product.

Where a medical representative distributes a sample of our products, the sample is handed directly to a person qualified to prescribe such product or to a person authorised to receive the sample on their behalf.

We maintain adequate systems of control and accountability and we adhere to all local Industry regulations and standards in respect of the supply of such samples.

We adhere to applicable laws and industry codes of practice relating to any distribution of samples.

For further information please refer to Global SOP Provision and Tracking of Medicinal and Medical Device Samples.

QUALITY AND SAFETY OF PRODUCTS

QUALITY AND PHARMACOVIGILANCE

Our Quality and Pharmacovigilance departments are committed to delivering safe and effective products to customers. We monitor the quality and safety of our products. Adverse events and product quality issues are promptly reported to the National Competent Authority (NCA).

Ewopharma ensures adherence to strict quality control standards in the testing, manufacturing, packaging, storage and transport of our products. We maintain a comprehensive Quality Management System that is committed to comply with internationally recognised Good Practice quality guidelines (GxP), especially Good Manufacturing Practice (GMP), Good Distribution Practice (GDP) and Good Clinical Practice (GCP).

We track deviations, complaints and other information potentially related to adverse events. As soon as we become aware of an adverse event it is reported to Ewopharma's Qualified Person for Pharmacovigilance (QPPV) so that it is quickly and appropriately investigated, addressed and resolved. We ensure that

safety data is exchanged efficiently and effectively with the relevant Partners or authorities. Ewopharma's Group Pharmacovigilance Department provides clear written instructions and training on how to identify an adverse event (AEs) / serious adverse event (SAEs) and how to report it. We abide to the strict requirements on us to promptly report all AEs and SAEs. Ewopharma's Group Quality Department ensures that any third party we engage to assist with the conduct of our activities maintain the same level of commitment. We achieve this by entering into Technical Quality Agreements and Pharmacovigilance Agreements. We continuously monitor business partners activities, systems, documentation and processes in relation to Regulatory Affairs, Quality and Pharmacovigilance.

For further information please refer to Global SOP Regulatory activities and responsibilities; Global SOP's on the Quality Management System and Quality Assurance; Global SOP's on Pharmacovigilance.

SUPPORTING OUR PEOPLE AND TEAM SPIRIT

SUPPORT IN THE WORKPLACE

Nurturing and requiring, like giving and taking, are values central to Ewopharma.

We promote and develop an inclusive working environment that promotes development of our employees. We encourage the professional development of our employees through internal and external training. Whenever possible we provide development opportunities and career progression in house.

Ewopharma hires reliable, highly skilled, motivated and loyal employees. Ewopharma employees take on challenges and appreciate the scope for independent action available to them. Ewopharma supports all employees in professional development to the best of our ability.

RESPECT IN THE WORKPLACE

At Ewopharma we:

- treat each other with respect and dignity and create a positive working environment;
- do not discriminate on the basis of race, colour, religion, gender, age, sexual orientation, national origin, disability, pregnancy, genetic information, employment or marital status;
- are always on time for appointments and meet our deadlines;

- are well perceived by good manners and well presented in appearance;
- are known for our strong team spirit and full transparency;
- act with a strong entrepreneurial spirit and demonstrate our open mind.

HEALTH AND SAFETY IN THE WORKPLACE

At Ewopharma we:

- are committed to the well-being of our employees and aim to provide a safe, healthy and secure workplace;
- adhere to all laws, regulations and industry standards relating to workplace safety and employee well-being;
- rely on employees to exercise care and caution in their workplace activities and promptly report any potential safety concerns to the Local Safety Officer or Manager.

For further information please refer to Global and Local Health and Safety Statements.

MANAGING INFORMATION

BOOKS AND RECORDS

At Ewopharma we maintain honest, accurate, objective and complete records of our business activities to sustain our operations as well as satisfy legal and regulatory requirements. We do not conceal inappropriate activities and disguise them with incorrect or ambiguous accounting entries. Dual authorisation and segregation of duties helps to ensure that payments are made once transactions are approved and verified.

At Ewopharma we:

- Do not accelerate or defer the recording of expenses or revenues to achieve financial results or goals; record all business and financial transactions truthfully and accurately;
- Record expenses in sufficient detail to provide a true and fair view of the transaction;
- Comply with policies and Generally Accepted Accounting Principles;
- Only authorise and sign business documents or financial statements if they comply with Group policies and procedures;
- Report actual performance and forecasts in a timely manner and to the Group reporting timelines;
- Retain, protect and dispose of records according to our policies and local government guidelines;
- File, maintain and store all records. When appropriate, records can be destroyed in accordance with company document retention policies and applicable procedures.

For further information please refer to Our Group Accounting and Reporting Policy.

ASSET PROTECTION AND CONFIDENTIALITY

We, as individuals and as a Group, are responsible for protecting Ewopharma's intangible assets such as proprietary information, intellectual property and trade secrets, and those that are entrusted to Ewopharma by our partners. Such information may include, but is not limited to: scientific and technical knowledge, know-how and experience, trade secrets, patents, trademarks and copyrights, research and technical data, results of clinical trials and manufacturing techniques.

Other valuable, confidential information may include, but is not limited to, information concerning marketing plans, sales data and business development opportunities, pricing information and strategies, customer lists and other information regarding Ewopharma AG's customers.

These assets must be protected from misuse or loss by adhering to Ewopharma's policies and applicable procedures on information security and data protection.

We provide employees with access to phone, email, computers and office supplies. We expect employees to limit their personal use of these assets to a reasonable amount. Ewopharma reserves the right to review and monitor company property to ensure its use is consistent with the Code and Ewopharma's policies and procedures.

Employees must report any suspected misuse of Ewopharma's assets, whether tangible or intangible, to their Line Manager, Country Manager or Local Compliance Officer or Group Compliance Officer or Group Legal Counsel.

For further information please refer to Local Guidelines on Data Protection Security.

DATA PRIVACY

Ewopharma's activities and services may require the collection of personal data from many different individuals, including customers, partners, patients, healthcare professionals and employees.

Ewopharma is committed to respecting personal data and taking great care to ensure security and confidentiality is maintained at all times. Our processing of personal data is carried out in strict compliance with local legislation and in particular the General Data Protection Regulation (EU) 2016/679.

Our commitment to preserving the rights of individuals in relation to their personal data is demonstrated by our comprehensive Data Protection Programme consisting of:

- policies and procedures;
- education, communication and training of employees;
- continuous internal monitoring and auditing of data processing activities in each of the Group's affiliates;
- having in place Local Data Protection Officers and a Group Data Protection Officer.

For further information please refer to our Group Data Protection Policy and Global SOPs which are referenced in the Policy.

TRANSPARENCY

There is a public expectation that interactions between Industry and Healthcare Professionals are not only conducted with integrity but are also transparent.

The regulators in some of our Ewopharma countries have already adopted transparency and disclosure legislation. In addition, self-regulatory industry bodies like EFPIA, EGA and MedTech Europe have also implemented their own transparency and disclosure guidelines. Ewopharma recognizes that disclosure can raise data privacy concerns and seeks to work with healthcare professionals to ensure that these concerns are addressed.

We ensure that all interactions with third parties, in particular HCPs, government employees or entities and patient organisations are transparent and accurately documented:

- The purpose and appropriateness of any payment, promotional gift, hospitality and similar arrangement must be written clearly and concisely on approval forms.
- Books, records and accounts must accurately and fairly reflect all transactions in reasonable detail.
- All service agreements must be the subject of a written contract that is properly signed, executed and authorized by all relevant persons and parties.
- Healthcare professionals, government employees and government entities who publicly act on our behalf must declare their engagement, where required or appropriate.
- We require transparency towards the employer of HCPs, government employees and government entities.
- We require transparency towards patients where we support patient programmes.

SPEAKING UP

REPORTING CONCERNS

We expect our employees to speak up and report suspected irregularities and non-compliance with this Code, our policies and standard operating procedures. We are committed to encouraging and promoting a culture where our employees are comfortable reporting suspected violations of the Code without fear of retaliation.

Ewopharma will not tolerate retaliation of any kind against an employee who, in good faith, reports an issue, plays a role in escalating an issue, or who cooperates during the evaluation or investigation of an issue. Employees who engage in retaliatory conduct are subject to disciplinary measures, up to and including termination of employment

If you become aware of a violation of the Code, or if you have an ethical question or issue, you are encouraged to first notify your Line Manager, Local Compliance Officer or Country Manager.

Local Compliance Officer or Managers who receive a report of a suspected violation of the Code will inform the Group Compliance Officer as soon as possible.

If you are uncomfortable reporting a concern to your Local Compliance Officer or Country Manager, then you can report those issues directly to the Group Compliance Officer using the Compliance Helpline email.

compliance.helpline@ewopharma.com

For further information please refer to GSOP Speak up Program.

OUR CODE

ACCEPTANCE OF OUR CODE

I (PRINT NAME) _____

have read this Code of Conduct and pledge to uphold the values of the Ewopharma Group as outlined in it.

Date

Signature