

# horizon

A book about the way we look at the world



**INSUD PHARMA**

A horizon.  
Something that is always there.  
Something that we all share.  
Something that unites us. And inspires us.  
A way of doing things.  
A way of seeing the world, work, corporate life,  
our responsibilities, ideas and values.  
A shared path.  
A clear and inspiring vision of our future.

**And how we will build it.  
A horizon.**

**horizon**



# CONTENTS

**THIS IS US**

by Leandro Sigman

**OUR MISSION**

**OUR VALUES**

**OUR CODE OF ETHICS**

# THIS IS US THE WAY WE ARE

**Our Code of Ethics is not made of paper**, even if you are reading it in printed form. It is not made of bytes either, if you happen to be viewing it through our website or any other digital format.

**Our code of conduct is made of realities**, our day-to-day work, a job well done. It is much more than a way of doing things, it is the way we are. That is why it means a lot more than “the paper it is written on”. It goes way beyond that. It is a living and fully effective document. Because we work for health all over the world, we act with integrity and transparency, respecting diversity, maintaining a steadfast commitment to society and the environment.

**This is why this code underpins our behaviour**, it is an ever-present compass. And this is also why it must be properly known and rigorously fulfilled by all our professionals and teams. This is the only way for us to maintain and protect the soul of our Group, which is what defines us. In a word, it is who we are.

**I invite you all to read it carefully**, to take it on board and put it into practice. Because we are all responsible for reinforcing and safeguarding our company’s reputation. I would also encourage you not to hesitate to use our **Insud Pharma directLine** to report any actions or deeds that contravene this code and jeopardise any of the values that have defined us ever since we began.

Thank you,



**Leandro Sigman**

CEO Grupo Insud



# OUR PURPOSE

To improve global health for everyone through innovative, affordable medicines.

# OUR OBJECTIVE



**OUR  
VISION  
OUR  
AMBITION**

We offer **global innovative solutions** to deliver better health for everyone, devoting our **passion, creativity and responsiveness** to making the unimaginable possible.



**OUR  
VALUES**

**OUR  
PRINCIPLES**

**Integrity and transparency** are the driving force of our everyday activity. They are what drives us, what allows us to continue to forge ahead with actions that represent our values: passion, innovation, entrepreneurial spirit and, naturally, diversity.

**These values are our hallmark**, defining us in the 40-plus countries in which we operate. They are not part of our corporate philosophy, they are what we have been ever since we began.



# OUR VALUES OUR PRINCIPLES

## INTEGRITY AND TRANSPARENCY

**Are the driving force of our everyday activity.** They are what drives us, what allows us to promote diversity and to work with passion, innovation and an entrepreneurial spirit.

These are the values that define us in the **40-plus countries** in which we operate. They are not part of our corporate philosophy, they are what we have been ever since we began.

That is why everyone at **Insud Pharma** is **honest and transparent** towards its customers, collaborators, competitors and society as a whole.

Following the rules, and providing all the help and information needed to work in the best conditions of excellence. When we say we will do something, we do it. Trust is built over time in just this way. We are honest and accountable. We strive to meet customer and partner expectations of quality, security, privacy, reliability, and business integrity. The well-being of patients and consumers is always our priority.

From the very beginning, Insud Pharma has tackled big challenges. Big challenges have little to do with a specific job and everything to do with the vision, passion and courage of our people.

## PASSION

We are a young, experienced and enthusiastic team. We are passionate about life. We have the utmost respect for what we work towards: health. With a passion for sport as part of the company's soul, and therefore driven by a spirit of self-improvement and teamwork.

## INNOVATION

Innovation is about non-conformism, about being open to change, questioning what we do every day, watching and learning. It is also about active listening, something that we do at Insud Pharma all the time with our customers and suppliers, as well as with our workers. It is about identifying and implementing new opportunities. Innovation means looking boldly towards the future.

## DIVERSITY

Diversity enriches us. It is interaction, not only of cultures, but also of points of view, languages or beliefs. That is why Insud Pharma likes and promotes diversity. Because we live and work for a global and diverse society, one where there is room for everyone, and to which we all contribute.



# OUR VALUES OUR PRINCIPLES

## ENTREPRENEURIAL SPIRIT

Our Company is the result of the dream of two entrepreneurs who managed to turn their vocation into a solid business project. That is why we love to support our workers' initiatives and encourage and promote creativity, dynamism and a critical nature. Moreover, remaining true to this entrepreneurial spirit allows us to continue to grow, by observing our environment and its needs.

It's up to each of us to build our Company and our brand by holding ourselves to the highest ethical standards and by operating with honesty and integrity.

We conduct business around the world and our people are citizens of many nations with diverse cultures and beliefs. We must recognize the global impact of our actions and decision-making and be always aware that we are subject to many laws, regulations, and other requirements that vary across the countries in which we operate.

Our values and the fulfilment of our code of ethics embody the firm commitment taken on by the whole Insud Pharma and its workers.



**OUR CODE  
OF ETHICS**  
OUR SET  
OF IDEAS



OUR CODE  
OF ETHICS  
OUR SET  
OF IDEAS

# WE RESPECT

our employees, partners  
and patients

The **Insud Pharma's** maxim is "respect everything and everyone". And more particularly those who work with us. That is why we encourage diversity as a form of mutual enrichment. We promote equal opportunities, integration and freedom of beliefs.

We like to create environments that motivate, disruptive settings in which our professionals can feel comfortable and cooperate. We are multicultural, and we treat everyone else the way we would like to be treated, always respecting the confidentiality and privacy of our customers, partners, workers and patients.

[MORE INFO](#)

OUR CODE  
OF ETHICS  
OUR SET  
OF IDEAS

# WE ARE FAITHFUL

We work honestly and  
transparently

**Our integrity and honesty** are reflected in the way we  
behave as professionals and in all related activities.

**Fair play** prevails in all our actions.

[MORE INFO](#)

OUR CODE  
OF ETHICS  
OUR SET  
OF IDEAS

# WE ARE COMMITTED

to patient health, society  
and the environment

**Safety and quality** underpin our work, and we are fully committed to patient health and the welfare of society. We seek to construct a positive reality, we are socially responsible and we make sure that our activity has no negative effects.

[MORE INFO](#)

OUR CODE  
OF ETHICS  
OUR SET  
OF IDEAS

# WE ARE OPEN

with our professionals  
and society

**Insud Pharma** is open and transparent with its customers and professionals. We like to converse, communicate and share. That is why we love social media and technology.

[MORE INFO](#)



# OUR CODE OF ETHICS OUR SET OF IDEAS

## 01

# COMMITMENT TO ETHICS & COMPLIANCE

We are committed to conducting business in accordance with the highest standards of ethics and integrity and in compliance with applicable laws.

Complying with applicable laws and regulations, with this **Code of Ethics** and with our own internal policies and procedures is not only the right thing to do, it is vital and necessary to the sustainable success of our Company.

**This Code of Ethics**, effective April, 2016 (the “Code”) establishes behavioural expectations to serve as foundation for our workplace culture and provides de basis for the way we conduct business. The Code reflects our values of integrity, honesty and accountability, translated into passion, innovation, diversity and entrepreneurship.

While the Code addresses a wide range of business practices and related activities, it does not cover every conceivable issue that may arise. Rather, it sets forth key guiding principles that represent the company. Therefore, detailed policies and procedures supplement the Code in many of the topics found in the Code, as well as in some areas that are not covered by the Code. **Access to these policies is available through links in the relevant sections of the Code.**

We aim to improve and to be better every day, new principles and orientations will be integrating this Code as we evolve as a company and as a responsible business citizen. New policies will be included when deemed helpful to our main goal of preserving our company’s business integrity.

We expect you to be familiar with the policies affecting your work and to follow those policies at all times.



# OUR CODE OF ETHICS OUR SET OF IDEAS

## 02

# GUIDANCE & REPORT COMPLIANCE COMMITTEE & directLine

### When and where to seek guidance?

This Code can't cover every situation. This Code lays out a number of common issues that you may encounter in the workplace and provides guidance for how to navigate those situations. It also points you to resources - such as related policy documents and people who can clarify them if necessary or if you are unsure of the right course of action.

When you face ethical issues, which are difficult to resolve, ask yourself these questions to help you act with integrity:

- Is it legal?
- Is it ethic?
- Could this adversely impact patient safety, product safety/quality or our reputation?
- Does this reflect our values, culture and mission?
- Does this comply with the Code of Ethics, ABC book & procedures?
- Does this reflect our values, culture and mission?
- How would our customers, shareholders and the general public look upon this?
- Would I like this printed in a newspaper?

If you have doubts, ask for advice or guidance. Any of us can, at times, be faced with situations where the right course of action is hard to determine. We are all expected to understand the content of this Code and related policies and procedures applicable to our work. Many additional resources are available to ask for advice and guidance, you can go to:

- Your manager or another senior manager.
- People (Human Resources).
- Compliance Department.
- The directLine.

Compliance Committee will always be available to help us ensure understanding of this Code's requirements.



# OUR CODE OF ETHICS OUR SET OF IDEAS

## 02

# GUIDANCE & REPORT COMPLIANCE COMMITTEE & directLine



### Consequences of violating this code?

We expect you to comply with the Code of Ethics and ABC book. Consequences for violations may include disciplinary action, up to and including termination of employment, and possible civil or criminal liability. Individuals who have willfully failed to report known violations by others may also be subject to disciplinary action.

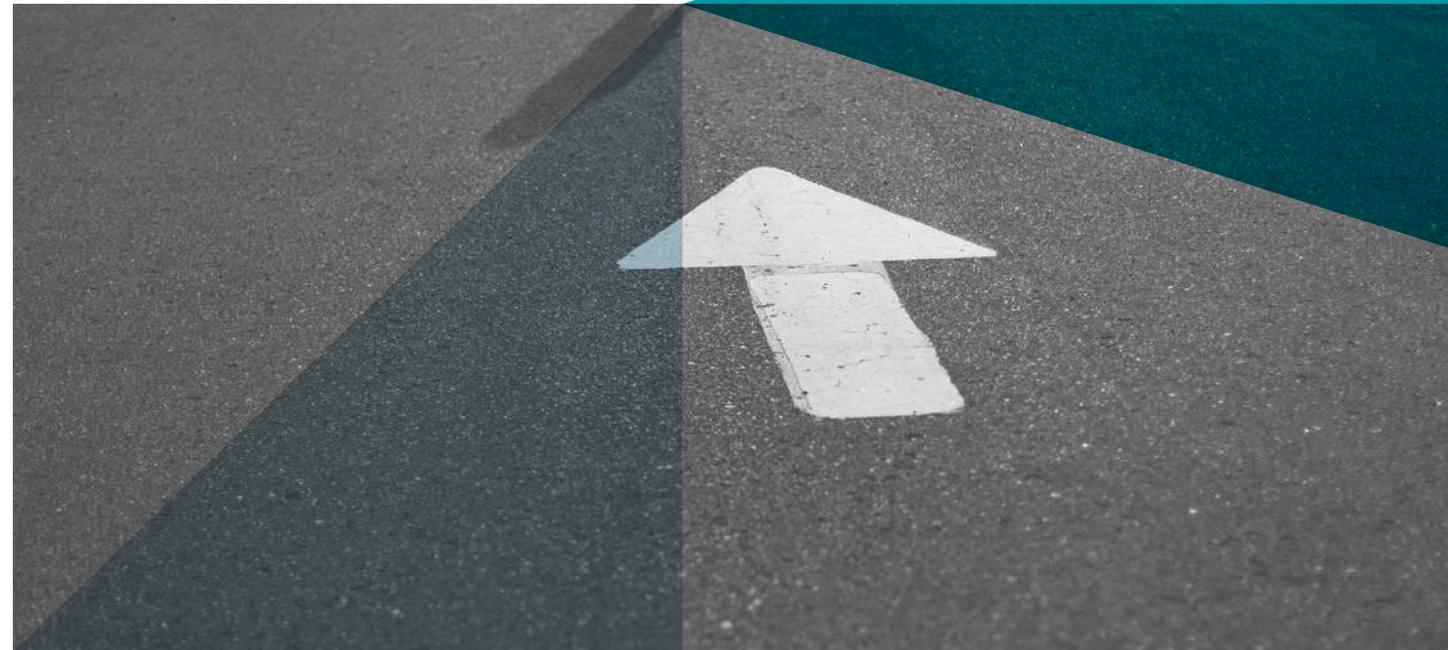
### Where to report violations?

We are expected to speak-up when acknowledging violations of this Code or violations of ABC book or other compliance situations. Senior leaders of any business or function are not only expected but requested for identifying, analyzing, raising and addressing key compliance issues.

### How to use the directLine?

For more information on the directLine link the following:

#### [Use of directLine](#)



# OUR CODE OF ETHICS OUR SET OF IDEAS

## 03

# OUR PEOPLE WORK ENVIRONMENT



### Dynamism & innovation

Staying on top requires hiring the best talent in a rapidly changing industry and investing in their potential. To attract and retain exceptional, disruptive and innovative people, we provide a dynamic, creative and diverse work environment that fosters collaboration and celebrates personal and professional growth.

We are open, honest, and respectful in sharing our ideas and thoughts, and in receiving inputs.

### Diversity

It is our belief that creating a work environment that enables us to attract, retain, and fully engage diverse talents leads to enhanced innovation and creativity in our businesses.

We are committed to a policy of no discrimination, by providing equal employment opportunity to all qualified employees and applicants.

This commitment is reflected in all aspects of our daily operations. For this reason, we promote a cooperative and productive work environment by supporting the cultural and ethnic diversity at all levels of the company. Our collective challenge is to enhance the company's performance through valuing and understanding differences.

### Freedom of opinion, speech and association

We respect everyone's right to choose to join an association, provided that local law is respected. The Company recognizes that we are all entitled to freedom of opinion, expression and speech, provided these do not interfere with our ability to fulfil our job responsibilities or conflict with this Code.

### Environment, Safety and Healthy Workplace

We are committed to creating a safe and healthy work environment by integrating sound safety and health practices within our operations.

We comply with applicable workplace safety and health regulations.

We are required to be familiar with national and local environmental laws and regulations, which relate to their employment responsibilities, and to comply with them at all times..

**“We respect the dignity  
of every person and honor  
our differences.”**

# OUR CODE OF ETHICS OUR SET OF IDEAS

03

## OUR PEOPLE WORK ENVIRONMENT



### Harassment-free

We respect the dignity of every person and honour our differences. It is important that employees speak up if they experience or witness harassment on the job or at work-related events. We want to maintain a professional and harassment-free working environment in our facilities worldwide.

Harassment generally means offensive conduct that is severe and pervasive and singles out an employee to the detriment or objection of that employee because of a difference protected by law, such as race, gender, colour, sexual orientation, religion, national origin, ethnicity, citizenship, age, marital status, disability or veteran status.

Harassment covers a wide range of conduct, from direct requests of a sexual nature to situations where offensive behaviour (e.g., insults, offensive jokes or slurs, offensive material in the workplace), to verbal or non-verbal threats, abuse or ridicule, assault or blocking of normal movement results in a hostile work environment.

We must not harass anyone. We must not threaten, insult, abuse or ridicule others and we must not create an intimidating, hostile or offensive work environment.

There will be zero tolerance with harassment situations.



# OUR CODE OF ETHICS OUR SET OF IDEAS

## 04

# CONFIDEN- TIALITY AND PRIVACY



We protect and respect the confidentiality of proprietary information and the privacy of employees, patients and customers.

### Confidential Information

We are responsible to maintain the confidentiality of the Company's non-public information. This includes the non-public information of outside parties (for example, customers, suppliers, business partners, etc.) that may be received in confidence during the course of our work.

Among others, the following types of information and documents are considered highly confidential, and strong access controls must be enforced to ensure access is only provided for authorized business use:

- Scientific data.
- Clinical trial information.
- Business strategy and plans.
- Customer information.
- Inventions.
- Patent applications.
- Patent litigations.
- Proposed trademarks.
- Cost of goods and Transfer Prices.

### Privacy

Many of the countries in which we operate, have implemented privacy and/or data protection laws that set requirements for the appropriate handling of personal data and we shall comply with all such applicable laws, as required.

We are committed to protecting the reasonable privacy expectations of those with whom we do business, including customers, consumers, and employees. Please do not hesitate to contact your manager, legal or compliance team to make sure you comply with applicable regulations.



# OUR CODE OF ETHICS OUR SET OF IDEAS

## 05

# HONESTY

**We are honest** and this shows in our professional conduct.

We want **our workplace to be fraud-free**. We understand fraud as the act or intent to cheat, trick, steal, deceive or lie in our professional conduct. It is important that we all understand what fraud can entail, some examples:

- Submitting false expense reports;
- Forging or altering checks;
- Misappropriating assets or misusing Company property;
- Unauthorized handling or reporting of transactions;
- Inflating sales numbers by shipping inventory known to be defective or nonconforming;
- Intentionally making any entry on company records of financial statements that is not accurate and in accordance with proper accounting standards, etc.
- Intentional acts of fraud are subject to strict disciplinary action, including dismissal and possible legal action.

## Anti-Retaliation

We do not have to fear retaliation. Retaliation against any employee, who in good faith seeks advice, raises a concern, reports misconduct or provides information in an investigation is strictly prohibited. If any individual, regardless of his or her role, retaliates against a colleague who has truthfully and in good faith reported a potential violation, **the Company will take appropriate action**—even if no violation is revealed upon investigation.

## Conflict of interest

We shall always act in such a way that our personal interests and those of our families or other persons related to us do not take preference over the interests of the Company or its stakeholders.

We all have a primary responsibility to advance our Company' business objectives, avoiding situations where our actions or personal interests create a conflict with Company' interests. Following are some common situations where conflicts of interest may arise

### 1. Accepting gifts, commissions, payments, loans or remuneration

Accepting gifts, including entertainment, must comply with normally accepted business practices and ABC book. Any gift that compromise our ability or our counterparts' ability to make objective business decisions are inappropriate and not permitted.



# OUR CODE OF ETHICS OUR SET OF IDEAS

## 05

# HONESTY

This is not intended to prohibit normal business practices as long as they are of nominal and reasonable value under the circumstances.

**Accepting any type of payment**, commission, loan or remuneration for transactions carried out by the Company **is prohibited**, as well as taking advantage of one's position to one's own benefit in any other way.

**We shall not accept** cash or personal loans from customers, suppliers or any other business partners related to the Company, unless it is a financial institution in its ordinary course of business.

**We are not limited to accept:**

- Promotional items of little value.
- Normal invitations not exceeding limits considered reasonable according to customary social usage and courtesies.
- Occasional courtesies for specific and exceptional reasons, provided they are not in the form of cash and are within moderate and reasonable limits.

“We are honest and this shows in our professional conduct.”

For **more information on accepting gifts link the following:**

[\\_ ABC book](#)

[2. Outside Employment](#)

As a director, officer or employee, we may not serve as an employee, director, officer or advisor to another business or institution if doing so would interfere with your ability to perform your responsibilities to the Company, or create a conflict of interest.

Any business relationship which may create a conflict of interest must be disclosed to our supervisor or to People for written approval.

We shall receive approval from People before engaging in outside employment, consulting, or serving on the board of directors (or comparable position) of an external organization.

[3. Business Relationships](#)

Decisions about suppliers, customers or business partners must be objective and free of personal considerations. **We should not have a “material or personal interest”** in a company that has significant dealings with our Company (for example as a competitor, supplier or customer). If this is the case, we need to seek prior approval from the Compliance Board before engaging in any kind of transaction with such company.



# OUR CODE OF ETHICS OUR SET OF IDEAS

## 05

## HONESTY

### 4. Business, Scientific and Professional Organizations

The Company supports our participation in culture, healthcare and professional organizations, so long as it does not conflict with the Company's interests.

Care must be taken to ensure that advice provided or services performed for outside organizations do not utilize proprietary information or conflict our Company' interests in any way.

### 5. Business Opportunities

We owe a duty to the Company to advance its business objectives when the opportunity to do so arises. As a matter of example, we may never:

- Take for ourselves, directly or indirectly, any business opportunity that would interest or likely interest the Company, or that is discovered through the use of corporate property, information.
- Use Company's assets or our position with the Company for personal gain.
- Knowingly compete with the Company in acquiring or selling any asset or property (whether tangible or intangible) or otherwise interfere in the Company's business affairs for direct or indirect personal gain or benefit.

If any of us wishes to participate in a business in which the Company holds a stake or a direct interest or even in any business in which the Company has renounced its stake, it is necessary to obtain prior authorisation from the Compliance Committee, once it has been verified that no possible detriment to the Company's interests is present and that no conflict of interests in any respect can occur.



# OUR CODE OF ETHICS OUR SET OF IDEAS

## 06

# FAIR PLAY IN THE MARKETPLACE



## Anti-corruption

**Corruption** of government officials and the payments of bribes or kickbacks of **any kind are prohibited**, whether in dealings with public officials or individuals in the private sector.

We are committed to observing the standards of conduct set forth in the different countries where we do business and the applicable anti-corruption and anti-money laundering laws of all of the jurisdictions in which we operate.

No one will suffer adverse consequences for refusing to pay or take a bribe or kickback, even if this results in the loss of business.

Distributors, wholesalers and other commercial intermediaries must adhere to the highest standards of ethical behaviour and regulatory compliance when they sell, distribute, or market our products and services.

Our representatives shall not pay or offer to pay a bribe, or provide another thing of value for the purpose of obtaining an improper benefit to any third party, public or private, with whom we are doing business or aiming to do business with in the future.

Suppliers must adhere to the highest standards of ethical behaviour and regulatory compliance and operate in the best interest of our Company. All suppliers are required to read and comply with the Standards for Suppliers.

For more information on **Anti-corruptions you should check our:**

**\_ ABC book**

For the Standards for Suppliers link the following:

**\_ Standards for Suppliers**

## Antitrust & unfair competition

We seek to compete fairly and honestly. Competitive advantage is to be achieved through innovation, price and quality in our products and through accountability in our commitments but never through unfair business practices.

We comply with the laws and regulations designed to promote healthy competition. This area of law varies from country to country and deals with complex legal concepts as antitrust, monopoly, restrictive or unfair trade, competition, price discrimination or cartel laws. In general, they seek to protect competition in the marketplace and they limit certain business practices that pretend to obtain or maintain a monopoly through something other than free competition on the merits. In many countries, it is illegal to:

- On price with competitors.
- Divide markets or customers with competitors.
- Share information with competitors about pricing, profit margins, costs, sales terms, credit terms, customers, pricing and related discounts, and other sensitive information

If you feel that you can be in one of these situations, do not hesitate to contact and seek advice from the Legal Team or the Compliance Department.

# OUR CODE OF ETHICS OUR SET OF IDEAS

## 06

# FAIR PLAY IN THE MARKETPLACE



### Trade & Exports Control

We respect all applicable export prohibitions or restrictions regarding international commerce. The sale of products may be subject, in certain countries, to a particular export and import control regulation.

The export and import laws are complex. In addition, many countries have trade restrictions, such as economic sanctions, embargoes and boycotts. Please do not hesitate to contact your supervisor, legal or compliance team to make sure your export and import activities comply with all applicable law.

### Money laundering

We shall not accept, facilitate or support money laundering. In order not to legitimate money coming from criminal or terrorist activities:

- We do not accept payments in cash
- We conduct business only with customers, suppliers or partners willing to provide us with proper information so that we can determine whether the payments are appropriate.
- We do not make a payment to an entity or accept a payment from an entity that is not a party to the transaction or is not legally entitled to receive payment, unless we receive prior approval of the Compliance Team.

### Political Activities & Contributions

We shall adhere to the non-interference principle in the functioning of public authorities in the countries where we develop business activities.

We respect the right of everyone to participate in the political process and engage in political activities of their choosing. As Company, our vocation is not to support political candidates and to maintain a neutrality principle.

Many countries prohibit or regulate corporate political contributions. Any proposed corporate contribution or political activity should be reviewed and approved by the Compliance Committee.

For more information on **Political Activities & Contributions you should check our:**

[\\_ ABC book](#)

# OUR CODE OF ETHICS OUR SET OF IDEAS

All financial transactions shall be accounted in accordance with generally accepted accounting practices, and the accounting records must show the nature of all transactions in a correct and non-misleading manner.

We believe that business continuity management is critical for our patients, customers, associates and other stakeholders, and is part of responsible management practice.

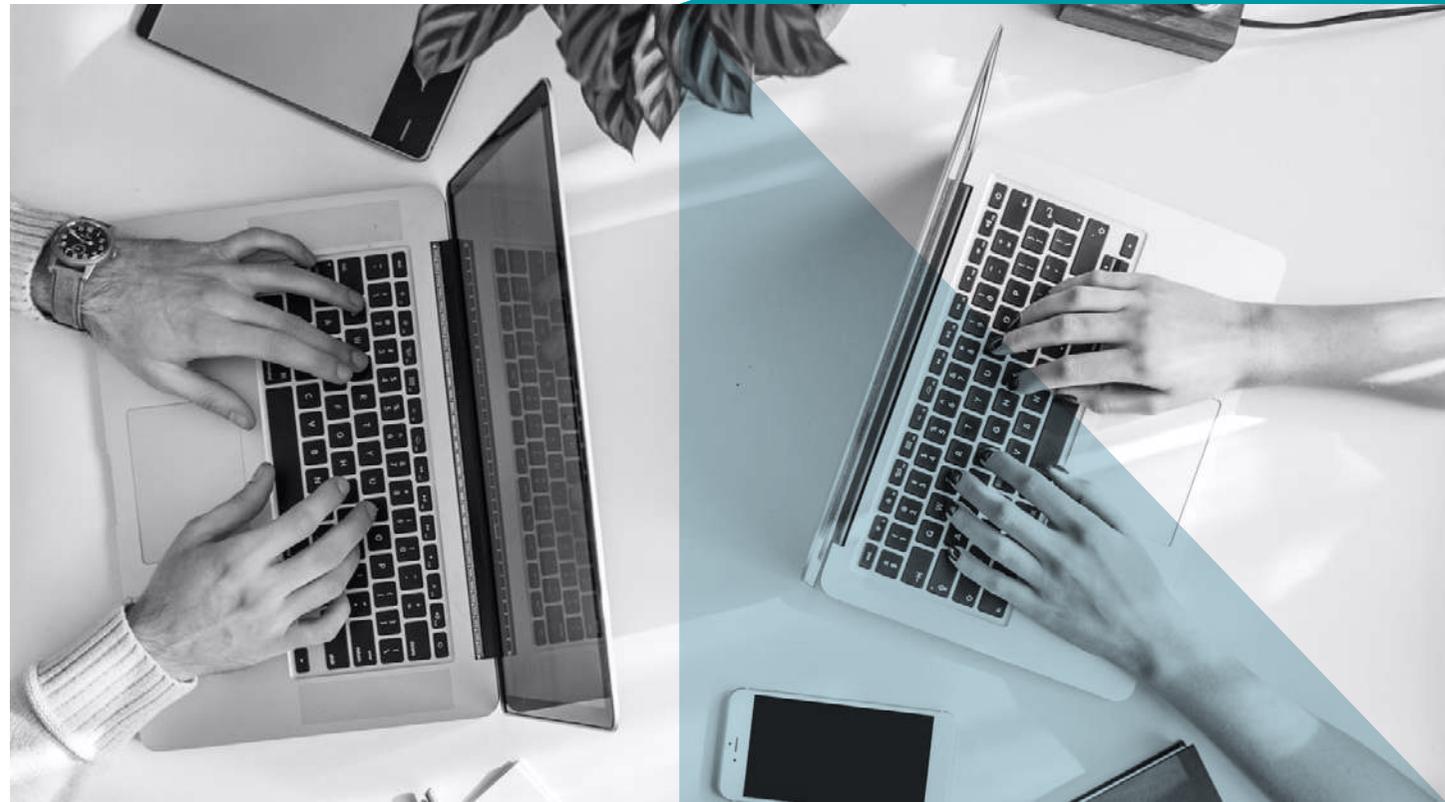
In the event of an emergency or significant business disruption, we are committed to doing our utmost to ensure uninterrupted supply of key products and services.

For more information on **Financial Integrity you should check our:**

[\\_ABC book](#)

## 07

# FINANCIAL INTEGRITY & BUSINESS SUSTAINABILITY



# OUR CODE OF ETHICS OUR SET OF IDEAS

08

## THE HEALTHCARE COMMUNITY

### Relationships with healthcare Professionals (HCP's)

We are committed to complying with all applicable laws, regulations, and industry codes in interacting with healthcare professionals (HCPs), healthcare organizations (HCOs), regulators, medical institutions and other healthcare organizations and patients' organizations (all together, "the Healthcare Community). HCPs, HCOs and patients organizations are subject to many laws around the globe and standards governing promotional activities and advertising.

We comply with these requirements by ensuring that we never improperly influence HCPs, HCOs and patients organizations when they make decisions about the use of our products.

We will not provide, offer, or promise any money, goods, hospitality, gift or any other item of value to induce or reward favourable treatment of our products.

We will follow applicable the ABC book and procedures designed in our country to ensure that our promotional information and advertisements comply with regulatory requirements and are accurate, balanced, fair, supported by scientific evidence and not false or misleading.



# OUR CODE OF ETHICS OUR SET OF IDEAS

## 08

# THE HEALTHCARE COMMUNITY

We will not promote our products for a specific use in a country until the requisite approval for marketing for that use has been given in that country.

When we obtain consulting services, advisory board services, or any other services from HCP's or other members of the Healthcare community, we will have a legitimate business need and we will not pay more than an appropriate market value for the services rendered.

For more information on **Relationships with HCP's you should check our:**

[\\_ ABC book](#)

### **Pricing and price reporting**

Accurate and timely pricing information assists governments, private payors, healthcare providers, patients, and other stakeholders. It is also important to our commercial success and to meeting our regulatory requirements.

The laws in this area are complex and vary from country to country.

Inaccurate pricing information and price reporting can expose us to significant legal risks.

Please do not hesitate to contact your manager or the Compliance Team to make sure you comply with applicable regulations.

For more information on **Pricing & Price Reporting you should check our:**

[\\_ ABC book](#)



# OUR CODE OF ETHICS OUR SET OF IDEAS

09

## OUR PRODUCTS PRODUCTS SAFETY AND QUALITY



### Product safety and quality

Patient safety is our highest priority. In our research, development, manufacture, storage, distribution and post-marketing activities, we will comply with all applicable laws and regulations. We also will always adhere to our internal policies and standard operating procedures designed to protect patient safety and to ensure quality of product.

We endeavour to maintain the highest level of quality throughout our business and assure quality of products according to all applicable laws and regulations, as well as the highest standards.

We do adhere to sound scientific and quality principles and ensures that these principles are reflected in our operations, including those in research, development, manufacturing, storage, shipping, distribution and post-marketing.

To uphold these principles, we comply with all applicable laws dealing with good operating practices according to the standards of the pharmaceutical industry.

We are committed to timely identifying, evaluating, and addressing product quality and safety issues.

Pharmaceutical companies are regulated globally by many government agencies. We are used to have agencies, customers and other institutions inspecting our facilities and activities. We have a long and successful history of working in cooperation with governments and regulatory bodies around the world, and we welcome inspectors as our partners in ensuring quality.

We are also committed to worldwide collection, review and reporting of any safety, quality, or performance issues concerning any of our products or processes. Our commitment to public health means that we always handle product complaints promptly and diligently. If you receive or personally know about a product complaint of any kind, in addition to carrying out your role in our procedure, be sure to report the complaint as soon as you become aware of it. We take all product complaints seriously and we investigate them quickly and thoroughly.

This includes responding promptly and responsibly to adverse drug experiences. An adverse drug experience is any unfavorable, unintended event associated with the use of a drug in humans, whether or not considered drug related.

You must report any suspected adverse drug experience immediately to Pharmacovigilance, in accordance with our Company's internal control procedures.

For more information on **Quality, Product Safety And Environment link** the following:

- [\\_ Pharmacovigilance Chemo](#)
- [\\_ Pharmacovigilance Exeltis](#)
- [\\_ Pharmacovigilance Mabxience](#)
- [\\_ Standards for Suppliers](#)

# OUR CODE OF ETHICS

## OUR SET OF IDEAS

09

# OUR PRODUCTS

## PRODUCTS SAFETY AND QUALITY



### Environmental respect

We are committed to operating our development and manufacturing sites worldwide in an environmentally responsible manner. We comply with all applicable laws and regulatory requirements relating to environmental, health and safety matters.

We seek to minimize the use and release of hazardous material and ensure its safe treatment and disposal and we encourage the use of sustainable products, facilities, and processes.

Suppliers must adhere to our standards of environmental compliance. All suppliers are required to read and comply with the Standards for Suppliers.

For more information on **Environmental link** the following:

#### [\\_ Standards for Suppliers](#)

### Charity & donations

The Company is socially responsible with its communities and always keen to collaborate with non-for-profit organizations that support worthy humanitarian causes. The Company encourages and is proud of those of us who volunteer in and financially support non-for-profit organizations.

The Company makes very relevant donations to **Mundo Sano** ([www.mundosano.org](http://www.mundosano.org)) and sponsors numerous activities in many domains related to

health, science community, sports and environment. We need to make sure that corporate contributions of financial, human and other resources from the Company shall always be made in compliance with the local laws and regulations and comply with all applicable transparency reporting and disclosure obligations.

For more information on **Donations and sponsorship Policy you should check our:**

#### [\\_ ABC book](#)



# OUR CODE OF ETHICS OUR SET OF IDEAS

## 10

# SOCIAL MEDIA & TECHNOLOGY



### Social networks

Social Networks and social media in general are in today's society a very strong and versatile way to create and share content, opinions, insights, experiences and perspectives in different ways.

**We love Social Networks** and encourage everybody to use them in their professional daily activity. Social media are very present in most of our premises and the use of Social Networks is very welcome and encouraged as a way to communicate among us and with our colleagues, stakeholders and our communities

Our Company is very proud of its people and we are free to open and make public our relation with the Company. The only requirement is to use common sense always keeping in mind potential consequences and to:

- Refrain from using social media to discuss issues that involve confidential and proprietary information.
- Be compliant with marketing and promotional laws and Company policies.

### Technology assets

At all times, we must use good judgment and common sense; conduct ourselves ethically, lawfully, and professionally; and follow applicable authorization protocols while accessing and using Company-provided technology, devices, or services, and related content.

Punctual or incidental personal use of the Company

information systems is permitted, subject to certain restrictions. Except where mandated by law, you are not guaranteed personal privacy for information sent to, sent from or stored in Company systems. Subject to local law, all documents, including electronic communications, are subject to review or monitoring at any time to address business or legal requirements.

In using Company devices and services, we do not create access, store, print, solicit, or send any material that is intimidating, harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate, nor do we send any false, derogatory, or malicious communications.

### Downloads

We cannot use of the Company's technology resources in a manner that constitutes an infringement of copyright.

When using Company's technology assets (such as computers, smart phones, tablets, servers, websites, applications, etc.), we must not download and/or store copyright material, post copyright material, transfer copyright material to others or burn copyright material to storage devices using Company resources, unless the copyright material is appropriately licensed.

**Copyright material includes software**, files containing picture images, artistic works, live pictures or graphics, computer games, films and music and video files.

If you have any doubt, do not hesitate to consult the **IT Department, the Legal Team or the Data Protection team**.