

Polpharma Group Code of Ethics



Dear Sir/Madam,

I am proud to present you with the Polpharma Group Code of Ethics which defines the system of values, standards and rules that we want to follow every day. It is our commitment to act in accordance with the highest standards in relations with our colleagues, partners, customers and the business environment in a broad sense. It is also a proof of our responsibility as a pharmaceutical company whose products have an impact on health and quality of life of our patients.

The Code of Ethics adopted by us is based on common ethical values of the Polpharma Group employees, such as respect, honesty, responsibility, solidarity and cooperation. The rules contained in the Code of Ethics apply to every employee, regardless of their position and the nature of the tasks performed in all companies being members of the Polpharma Group, both in Poland and abroad.

This document is an element of a comprehensive Ethical Conduct Programme the purpose of which is to build a strong ethical culture in the Polpharma Group. Almost 2,000 employees were engaged in the process of development and consultation of the Programme which shows how unique the project is in our company.

The establishment of the Code of Ethics confirms that we are a trustworthy company whose operations are based on respect for the law, applicable procedures and the highest standards of conduct. The rules written in the Code are a valuable signpost in taking day-to-day decisions and making the right choices.

We set the bar very high for ourselves and we expect our suppliers and contractors to do the same. We would like to see that our business partners respect our values and are guided by similar rules of conduct. We hope that our efforts will be a model for others, which will help to raise standards across the whole pharmaceutical industry.

Yours faithfully,

Jerzy Starak
Chairman of the Supervisory Board
of Polpharma SA



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1. About the Polpharma Group

The history of Polpharma dates back to 1935, when the pharmacist Kurt Boskamp founded the Polpharma Polish Chemical and Pharmaceutical Plant in Starogard Gdański.

Whenever the term of “the company” is used in the Code of Ethics, it should be understood as any of the entities of the Polpharma Group separately, as well as the Polpharma Group as a whole.

The term of “an employee of the Polpharma Group” means an employee of any entity of the Polpharma Group and an employee of our strategic partner – Farmaprojects.

Some issues tackled in the Code of Ethics may be regulated by more specific procedures in force within the Polpharma Group.

The Code of Ethics is available to the public at the www.polpharma.pl website, via the intranet of the Polpharma Group, from the direct supervisor and from the Compliance Officer.

After World War II the factory was nationalised, and in 1959 – incorporated into the Polfa Pharmaceutical Industry Union. In 1995, the company returned to its historic name of “Polpharma”. In 2000, the company was privatised, which influenced its dynamic growth.

Polfa Warszawa, who joined the Polpharma Group in 2012, can boast even a longer history since its beginnings go back to 1824 when the Institute of Artificial Mineral Water, the precursor of today’s Polfa Warszawa SA, was founded.

Today we are a leading company in the Polish pharmaceutical market and an international pharmaceutical group operating in the markets of Central and Eastern Europe, the Caucasus and Central Asia. We are among 25 largest generic companies in the world. Apart from drugs and active pharmaceutical ingredients, we also produce dietary supplements, dietary foods, medical devices and cosmetics.

The Polpharma Group includes: Zakłady Farmaceutyczne Polpharma SA having its seat in Starogard Gdański and manufacturing plants in Duchnice and Nowa Dęba, Polpharma Biuro Handlowe Sp. z o.o. in Warsaw, Medana

Pharma SA in Sieradz, Polfa Warszawa SA, the Russian company of Akrikhin, Chimpharm – the leading local pharmaceutical manufacturer in Kazakhstan, and the Swiss company of Swiss Pharma International AG. The operations of our strategic partner, Farmaprojects from Spain, are also integrated with the operations of the Polpharma Group. We also have agencies in Lithuania, Ukraine, Belarus, Azerbaijan, Uzbekistan, the Czech Republic, Bulgaria and Vietnam.

We implement innovative solutions in all areas of our operation. We use world-class technologies and the highest manufacturing standards. We are committed to the development of science as well as health education and prophylaxis. Patients, doctors and business partners put trust in us.

Our strength is measured by the commitment of our employees. We employ over 7,000 people in Poland and abroad. We offer attractive workplaces enabling people to develop and achieve their goals and to bring benefits to themselves, the company and its environment.

2. *Why was the Code of Ethics drawn up?*

We are aware of the responsibility resting with us as a company helping diseased people. We also support people who want to be healthy in everyday life. We offer knowledge and experience to all those who use our products. We understand the importance of trust in quality of our everyday work.

We wish to act in accordance with standards and rules based on ethics. They originate from the system of values shared by everyone at the Polpharma Group and come from our tradition and culture shaped over the years. With these values, we are building the position of the Polpharma Group and bring benefits to the environment and employees.

The declaration of ethical conduct included in this Code is our motivation and impacts the direction and shape of our decisions and actions. For our patients and partners, this declaration is a guarantee of honest and socially acceptable rules of our business.

The Code of Ethics provides a framework and defines standards for our behaviour, offering the support required to work in accordance with ethical standards and applicable laws. This does not exempt our employees from the necessity to judge on their own whether a specific behaviour supports the reputation of the Polpharma Group as an honest and reliable business partner, whether it poses a threat of damage to the company or its image and puts our customers at risk of lack of access to our products.

Each employee of the Polpharma Group is obliged to act – both in outside and inside relations – in a manner compliant with the provisions of this Code. We also expect people, companies and organisations we cooperate with to respect our ethical code of conduct and to conduct their business in a fair and lawful manner.

Our Code of Ethics serves as the basis of the ethics-based business culture of the Polpharma Group. It is included in contracts signed with our employees.

3. *Who does our Code of Ethics apply to?*

The Polpharma Group Code of Ethics is a commitment of all employees to comply with ethical norms and standards of the Polpharma Group and the applicable provisions of law, regardless of their position, seniority and working hours.

The Code also applies to individuals employed on a basis other than a contract of employment. This means that both persons employed under an employment contract as well as persons who cooperate with the company under civil law contracts, temporary employees or employees seconded by external companies providing services to the Polpharma Group must be familiar with and adhere to the rules contained in the Code of Ethics.

4. *How do we act?*

As individuals to whom the Polpharma Group Code of Ethics applies:

- ✓ we respect the applicable provisions of law,
- ✓ we act in compliance with the ethical norms and standards defined in the Code of Ethics both in internal and external relations,
- ✓ we follow company procedures,
- ✓ we counteract unacceptable behaviour in our workplace – we react whenever we notice behaviour contrary to ethical rules adopted at the Polpharma Group and applicable provisions of law,
- ✓ we report cases of violation of ethical standards adopted at the Polpharma Group and applicable provisions of law to the direct supervisor, to the Compliance Officer or to any other designated persons, through the violation reporting channels established in the company,
- ✓ in justified cases, we propose to the Compliance Officer solutions which improve the Code of Ethics or support the creation of the desired ethical culture at the Polpharma Group.

In a situation where national legal regulations are stricter than the Code of Ethics and company procedures, or in a situation where the national regulations are less strict than the Code of Ethics and company procedures, we always adhere to stricter regulations.

5. *Management's attitude*

Representatives of all levels of management in the Polpharma Group are individuals whose attitude should serve as a good example and a role model for other employees.

Supervisors are particularly responsible for:

- ✓ creating conditions enabling their subordinates to accomplish their objectives and tasks which will help to establish a workplace culture based on the ethical values adopted by the company,
- ✓ promoting the standards and rules of conduct defined in the Code of Ethics in everyday professional practice through conversations with employees and paying attention to ethical issues at work,
- ✓ enabling all employees to get to know the Code,
- ✓ within the area of their competences – providing all necessary explanations and advice with respect to solving ethical problems reported by employees,
- ✓ receiving reports from employees regarding cases of violation of rules defined in the Code and applicable provisions of law, analysing them and undertaking appropriate action,
- ✓ responding to any behaviour which may result in negative consequences for the Polpharma Group,
- ✓ providing necessary support to employees who report ethical concerns as well as protecting them against retaliation by individuals who act unethically.

6. *What to do in an ethically questionable situation?*

The Code of Ethics constitutes the main source of information about the rules and ethical standards of operation at the Polpharma Group.

However, we assume that situations may occur in which the provisions of the Code of Ethics may be insufficient for proper ethical evaluation. In such cases, we should all consult our doubts with the direct supervisor or with the Compliance Officer.

If you do not know how to act in a given situation, the answers to the following questions may be helpful:

- ✓ Is my behaviour in this situation compliant with the provisions of law and the procedures in force at the Polpharma Group?
- ✓ Is it compliant with the ethical values and rules described in the Code of Ethics?
- ✓ Is it compliant with my values and code of conduct?
How will I feel if I act like this?

- ✓ Can this behaviour impact the decisions I make when performing my professional obligations?
- ✓ Would I like others to behave like this on everyday basis?
- ✓ Would I like to be treated this way?
- ✓ How would my loved ones feel if they knew about my behaviour?
- ✓ How would my supervisor and colleagues react to this situation?
- ✓ Can this situation put the Polpharma Group at the risk of financial or image-related damage?
- ✓ How will my loved ones, colleagues, supervisors and the Polpharma Group's environment react if the situation is shown by the media?
How will I feel?

7. *System of ethical values of the Polpharma Group*

**“People helping People”
– this is the motto inspiring our operations.**

It is based on a system of ethical values shaped by personal and professional attitudes of people building the Polpharma Group over the years. These values guide our actions both inside and outside the organisation.

Respect

The human being is most important. We treat people and work with respect, and it drives our relations with employees and people using our products. We strive to create a work environment free from unethical behaviour and discrimination, which is characterised by respect for the dignity and diversity of employees. We want our workplace to foster employee development and fulfilment of their professional and personal ambitions. We respect the right to protect the privacy of our employees and people we cooperate with.

Honesty

Strict observance of the provisions of law serves as the basis for the Polpharma Group's reliability and reputation. In each country of operation, our employees are obliged to know and adhere to the applicable legal requirements.

For us, honesty is also about acting in accordance with acceptable ethical rules and good practice. This is reflected by the way we communicate and compete on the market and

by honest and reliable advertising and promotion of our products.

Responsibility

We all feel responsible for our workplace and the quality of tasks performed. We fulfil our obligations with diligence and commitment. We care for the company property and protect it from excessive risk. We keep commitments and respect trade secrets and confidential information.

We pay particular attention to the safety and quality of our products. We feel responsible for ensuring constant availability of the products we manufacture, in particular of the life-saving drugs.

Solidarity

We offer help and support to diseased and suffering people. We strive to constantly improve our therapeutic solutions in accordance with the highest standards of the pharmaceutical market. Solidarity with another human being makes for the fact that we see our work as service and commitment.

Cooperation

We value teamwork based on knowledge and diverse competences of all employees and organisational units of the Polpharma Group. We build our company's position using experience but also openness to new ideas, which serve as the basis of our innovativeness.

We value open communication and dialogue. Our goal is to constructively achieve agreement and build partner relations. We strive for achievement of our common goals, supporting each other in the implementation of our plans. The cooperation between people, teams and all entities which form the Polpharma Group makes for our success on the market. It also enables the reinforcement of mutually beneficial relations with business and social partners.

7.1. *What rules do we follow in relations with colleagues?*

We value good workplace atmosphere which comes from positive, respectful and cooperative relations with colleagues and business partners.

We show commitment, responsibility and integrity in performance of obligations. We ensure work conditions which foster the development and professional satisfaction of employees. We care for their safety and health. We respect the right to protect the privacy of employees.

Our ethical values enable the creation of a friendly work environment:

We offer equal chances of promotion, professional development and rewarding

We motivate our employees to act. We develop their talents and abilities. We want them to identify with the company and understand their role within its structures. We establish remuneration and bonus systems based on objective criteria. Supervisors carefully and honestly evaluate the work of employees based on matter-of-fact criteria. We value professionalism, experience and work results. The employees' career paths in the company depend on the company's needs as well as their results and commitment to the performance of assigned tasks. We discuss professional devel-

opment opportunities with our employees, providing them with reliable and complete information in this regard. We provide our employees with access to knowledge and skills improvement programmes implemented at the company, as required by individual positions.

We respect human dignity

We do not accept any behaviour which violates the dignity of employees, including irreverent, discriminating, offending behaviour and behaviour which violates their personal rights. We protect and do not publicise private information, we do not besmirch our colleagues. We are firmly opposed to any action concerning employees which involves harassment or intimidation aimed at lowering their self-esteem, isolation or elimination from a team. We respect the dignity of others and show good manners. We treat all employees with equal respect, regardless of the form of employment and their employer within the Polpharma Group. We do not discriminate against anyone on grounds of gender, age, ethnic origin, nationality, religion, sexual orientation, appearance, health condition, disability or affiliation with trade unions.

We act and communicate honestly

In advertising, we act honestly, fairly and do not mislead those to whom we address advertising. We comply with the law and internal procedures, and with ethical rules. We communicate with respect, in a professional manner which supports the Polpharma Group's reputation. We do not resort to unfair practices such as deception, omission, or deliberate misleading.

We honestly communicate decisions regarding our employees and discuss their work results. We provide information regarding expectations and assigned tasks. We provide access to messages relating to the functioning of the company to the extent necessary for the proper performance of tasks. We share knowledge and communicate in a manner which fosters creation of partnership-based and agreeable rela-

tions in teams and among companies from the Polpharma Group. We value cooperation and mutual support in the effective achievement of planned objectives, bringing profit to the company and its environment.

We ensure safe and healthy working conditions

Work safety and protection of health of employees and people we cooperate with are very important for us. We respect the provisions and regulations which refer to safety and health protection for individual work stations. We undertake actions to improve the working conditions beyond legal requirements in the field. We strive to increase employees' awareness and commitment to the provision of safe working conditions, including warnings of life or health threatening situations.

We appreciate diversity

We perceive diversity as the company's strength. Our culture involves openness to everyone, regardless of their gender, age, ethnic origin, nationality, religion, sexual orientation, appearance, health condition, physical capabilities or any other aspect of diversity among the employees. In our everyday operation, we make use of the rich and diversified experience of our colleagues, customers and business partners. We respect the opinions of others. We perceive dialogue and exchange of knowledge as sources of our development and creative approach to overcoming difficulties and challenges.

We care for the good reputation of the Polpharma Group

We trust each other and respect the right to protect our employees' privacy. At the same time, we remember about the impact of our behaviour outside work on the reputation and image of the Polpharma Group. In relations with the environment, we act in a manner that protects the company's good reputation. We respect the brand and values of the Polpharma Group. We follow the rule which states that communication with the media on the Polpharma Group and its companies is conducted only by authorised persons.

7.2. What rules do we follow in business relations?

We conduct our operations responsibly and fulfil the commitments towards our employees, customers and business partners.

We attach importance to respecting the principle of trade secret and protection of the Polpharma Group's assets. In our everyday work, we undertake actions to prevent the conflict of interests. We also feel responsible for the application of honest practices towards our competitors, suppliers and consumers.

All employees of the Polpharma Group are responsible towards patients for the quality and unobstructed access to the products we manufacture. We consider this our most important commitment. We value professional integrity. Each employee, within the scope of his/her responsibilities, actively counteracts all situations which are not compliant with the adopted standards of conduct.

Pursuant to the rules of social responsibility, we care about good relations with local communities and about the natural environment in the vicinity of our facilities. We value our employees' involvement in counteracting social and environmental problems in the company's surroundings.

Our ethical values enable the creation of responsible approach to business:

We fulfil our commitments

We make every effort to perform our obligations. With the safety of our customers and business partners and fair relations with colleagues in mind, we do not make promises that we cannot keep.

We protect the company assets

Each of us is responsible for preventing the misuse or waste of the Polpharma Group's assets. Company assets include, among other things, fixed assets and other movables, proprietary information, trademarks and other intangible assets, all funds and cash. Time is another important asset and we are obliged to use it efficiently. Polpharma Group's assets are used exclusively for the employees' proper performance of their duties. We do not accept their use for private purposes in a manner inconsistent with applicable procedures.

We respect intellectual property and trade secret

We do not use confidential information, including information recorded in an electronic form, from previous employers or any other source, if we do not have adequate rights. We protect and secure commercial, technical and scientific information regarding entities from the Polpharma Group from being made available or used by unauthorised persons if its disclosure could cause damage or any other disadvantage to the Polpharma Group. We protect and secure the confidential information provided by our customers and business partners in the same manner. We do not use any products of third party's intellectual creativity manifesting itself in any form if we do not have relevant rights to do so.

We avoid the conflict of interests

Conflicts of interests may be caused by situations in which personal or family interests of an employee, or other con-

nections, are contrary to the interests of the company. Such situations may occur frequently, especially in a smaller community. The way to avoid a conflict is to be aware of the possibility of it occurring and to take appropriate measures immediately.

Polpharma Group employees who are in conflict with the interests of the company are obliged to inform their supervisor or the Compliance Officer, and withdraw from an activity or participation in taking a decision involved in the conflict. In such a case, once a specific situation has been identified, an activity may be carried out or a decision may be taken by the supervisor or another designated person who is not in conflict of interests.

If in doubt as to whether there is a conflict of interests, please contact your supervisor or the Compliance Officer.

The conflict of interests may occur, among others, if:

- ✓ the employee awards contracts or following the award of the same he/she is responsible on behalf of the Polpharma Group for cooperation with his/her family members or people he/she is related with, and with companies owned by the employee, his/her relatives or people he/she is related with,
- ✓ the scope of the employee's official duties gives rise to the possibility to make personnel decisions regarding e.g. remuneration, promotion or recruitment of family members or people he/she is related with,
- ✓ the employee is involved in such activities of other entities or supports such activities of other entities that may adversely affect the interests of the Polpharma Group

If the employee intends or other persons intend, for the benefit of the employee, to acquire shares or stocks in com-

panies which are competitors, suppliers or business partners of the Polpharma Group, this fact needs to be reported in advance to the supervisor or the Compliance Officer. The same applies to the intended acquisition of shares or stocks in a company that the Polpharma Group wishes to acquire (if the employee is aware of the intention). The company may oppose to any such transaction if the execution of the same may affect the performance of duties by the employee, in particular the lack of objectivity or adversely affect the Polpharma Group's image. The duty to inform does not apply to the acquisition of publicly traded shares by employees.

We do not offer and do not accept benefits

We do not compromise the company's reputation by offering or giving excessive or improper personal or financial benefits in order to establish or maintain a business relationship. We do not accept direct or indirect giving or offering by the employees of the Polpharma Group of: money, gifts, services or other benefits to politicians, public officials, auditors, employees of organisations and other bodies that could induce them to take or give up certain actions as part of their official duties.

The benefits offered by us as part of promotion and advertising activities to doctors and pharmacists – to the extent permitted by applicable provisions of law – cannot be excessive, improper or contrary to accepted practice. We do not offer benefits which formally do not violate the law but may be negatively perceived by the society, cause negative reaction of the person receiving the gift or pose a threat to the reputation of the Polpharma Group.

The remuneration offered to doctors and pharmacists in return for provision of services permitted by the law must correspond to the qualifications and amount of work and cannot exceed the rates accepted by the market.

In any case, employees of the Polpharma Group are forbidden to accept any gifts of cash or its equivalent (e.g. cash gift

cards or vouchers). Our employees may accept business gifts from partners of the Polpharma Group only to the extent permitted by applicable local law and standard practice, and only where gifts are occasional or promotional and do not result in a commitment to reciprocity, or to take or refrain from certain actions. The value of gifts and procedure for conduct after receiving them must be compliant with relevant internal regulations of the Polpharma Group in this respect.

We do not go beyond the limits of hospitality

Company guests are treated properly and without excessive hospitality. We exercise due diligence to ensure that our hospitality takes into account the guest's traditions and culture and is only a sign of respect and good business custom. We do not offer gifts or invitations that could be perceived as offering benefits that may induce someone to take or give up a particular action, or that could harm the reputation of the Polpharma Group in any other way.

Acts of hospitality towards doctors and pharmacists during promotional meetings and scientific events are acceptable only within the limits compliant with the provisions of law. Regardless of the applicable provisions, the hospitality may not be excessive in relation to the goal and nature of the meeting and cannot violate the established practice. We refrain from acts of hospitality which could be negatively perceived by the society, cause negative reaction of the person receiving the gift or pose a threat to the reputation of the Polpharma Group.

We apply honest competition and promotion rules

Our policy is to comply with the rules of fair competition. We ensure that our advertising and promotional activities are in line with applicable regulations, while also taking account of the internal procedures of the Polpharma Group. In advertising, we act honestly, fairly and do not mislead the public.

We do not accept providing customers and business partners with unreliable or untrue information or information which can be misunderstood or understood ambiguously. We do not use deception or omission.

We build good relations with our suppliers

As a socially responsible company we attach importance to our suppliers respecting international standards for the protection of human rights, prohibition of child labour and forced labour, the application of the principle of fair competition, anti-corruption and environmental protection.

It is important to us that our suppliers are aware of and respect the ethical values of the Polpharma Group.

During the supplier selection process we adhere to internal procedures of the Polpharma Group. We are guided by the principle of objectivity and equality of all entities seeking to work with us. We provide information and evaluate the quality of cooperation with suppliers in a reliable manner, seeking to objectively and promptly clarify any doubts related to the cooperation process.

We ensure product quality and safety

The safety and quality of our products is our top priority. We take care of it at every stage of their development, production, storage and sale. We follow the international standards of the Good Manufacturing Practice. Each employee feels co-responsible for the safety and quality of products and through his/her everyday actions contributes to the compliance with accepted standards in this respect.

We support our patients and the medical environment

We are involved in programmes designed to facilitate patients' access to modern diagnostics and education as regards prevention and healthcare. We cooperate with the medical environment in this area. We support scientist in the field of medicine and pharmacy, among others through the operation of the Polpharma Scientific Foundation.

We care about good neighbourhood

We aim to ensure good relations with local communities, based on understanding and cooperation. We respect mutual expectations and commitments. We try to participate in the development of local communities through input in the economic, social and cultural growth, in a manner corresponding to the scale of our operations in a given region. We foster and support the social involvement of our employees.

We conduct our operations in accordance with applicable provisions of environmental law, bearing in mind the constant reduction of negative impact on the quality and conditions of living in the vicinity of our production facilities. We use advanced technological solutions and apply the highest environmental protection standards in order to preserve its qualities in accordance with the idea of sustainable development. We shape the ecological attitudes of our employees and create awareness regarding the importance of environmental protection in our surroundings. We value the activities of our employees aimed at the improvement of natural environment both at work and outside work.

8. *Reporting violations*

Ethical institutions at the Polpharma Group

At the Polpharma Group, there is the Compliance Officer who supervises the application of the Code of Ethics and observance by employees of the provisions of law and applicable procedures. The Officer's tasks include supporting entities from the Polpharma Group in the implementation of the Ethical Conduct Programme aimed at the creation of a desired ethical culture at the company.

The Compliance Officer takes an independent position with respect to the cases of violation of law and rules of ethics adopted by the Polpharma Group. Explanatory proceedings in this respect are conducted independently or in cooperation with Ethics Teams created in the companies from the Group. They are formed by individuals having experience and competence necessary to resolve any matters relating to the breach of law or ethical rules. The Compliance Officer participates in the works of individual Teams, supervising the proper functioning of the system for reporting violations and conducting proceedings.

Violation reporting system

An employee of the Polpharma Group witnessing a violation of the provisions of law or provisions of the Code of Ethics may undertake independent actions aimed at improving the situation.

The employee may also report the case of violation of the provisions of law or provisions of the Code of Ethics in an open conversation with his/her direct supervisor, who shall offer necessary support. If the employee cannot approach the supervisor or if it is inadvisable due to the nature of the case, he/she should directly contact the Compliance Officer, who shall undertake explanatory proceedings.

The employee should act in such a manner also if he/she reasonably suspects the occurrence of violation of the provisions of law or the rules laid down in the Code of Ethics.

The violation of the provisions of law or the Code of Ethics can also be reported by an external stakeholder of the Polpharma Group.

In order to notify the Compliance Officer of the violation of the provisions of law or the Code of Ethics, the following methods may be used:

- ✓ *direct meeting, after establishing the time and place*
- ✓ *telephone conversation or leaving a message:
phone number +48 22 364 60 29*
- ✓ *sending an e-mail to: etyka@polpharma.com*
- ✓ *filling in the form available at the www.polpharma.pl website*
- ✓ *sending a letter to:
Compliance Officer, Polpharma Biuro Handlowe Sp. z o.o.,
ul. Bobrowiecka 6, 00-728 Warszawa*

The reported cases of violation do not have to concern the reporting person. Each employee of the Polpharma Group should report in good faith cases of violation of the provisions of law or the Code of Ethics, even if the given situation does not concern him/her directly.

If during the explanatory proceedings the violation of applicable law or the Code of Ethics is stated, the Compliance Officer takes appropriate measures to remedy the situation and, if justified, to make the person responsible for the violation suffer the consequences.

The Compliance Officer informs the reporting person of the result of explanatory proceedings.

The Compliance Officer can also be consulted in the cases of violation of Polpharma Group's procedures other than the Code of Ethics, if their content indicates that such cases should be reported to the Compliance Officer.

Protection of identity of the person reporting a violation

During the explanatory proceedings, we guarantee the protection of identity and discretion to all reporting individuals. Until the accusations are confirmed, the identity of the person accused of the violation is also protected. This is aimed at preventing negative consequences for the reporting employee and for the person wrongly accused of a violation. The protection does not include the possibility to disclose the personal data of the reporting employee only if this is required by the mandatory provisions of law.

No tolerance for activities aimed against individuals reporting a violation

At the Polpharma Group, we do not tolerate any retaliation against individuals reporting cases of violation of the provisions of law, the Code of Ethics or other company procedures. Any person who engages in such activities will undergo a separate disciplinary action, which may result in termination of employment.

The Polpharma Group Code of Ethics has been adopted pursuant to a resolution of the Management Board of Polpharma SA and becomes effective on 1st January 2015.

All actions necessary to implement the Code in the companies of the Polpharma Group are to be undertaken by their competent governing bodies.