

## **FARMASYN Code of Ethics**

(3<sup>rd</sup> Version, June 21, 2022)

### **PREAMBLE**

This Code of Ethics of FARMASYN aims to maintain a high sense of responsibility and compliance on the part of all FARMASYN staff. It is the general framework which outlines the behaviour that all FARMASYN Employees and Associates (third-party Associates, proxies, agents, consultants, business Associates, sub -distributors, etc.) must demonstrate with the utmost concern being to conduct their daily practice in properly and ethically, and to adhere to the core values that must govern the daily business activities of Company. At the same time, this Code will not exclude the obligation to comply with any stricter accountability standards that may be set by the law and by national or even international regulations. In addition, this document sets forth the Company's expectations from all its personnel (Employees, third-party Associates, proxies, agents, consultants, business Associates, sub -distributors, etc.) in various matters, including labour and human rights, management systems, ethical business practices and other important issues.

### **1. Purpose**

FARMASYN is committed to conduct its transactions and its activities in a lawful and ethical manner, and this commitment covers the transactions and activities of all of its Employees and Associates (natural or legal persons) without exception which must be governed by the same principles. The FARMASYN Employees and Associates are understood as an extension of the Company and are therefore expected to adhere to similar ethical business practice guidelines. A necessary condition for the continued cooperation with all members of the FARMASYN supply chain is their compliance with this Code of Ethics ("Code"), which is described in detail below. FARMASYN considers that its Associates are entitled to request that their own Employees and Associates (natural or legal persons) show the same form of compliance to the principles and activities referred to in this Code.

FARMASYN focuses on:

- The prevention of child labour, forced labour or other forms of human trafficking / exploitation or harassment.
- The fair and ethical treatment of employees, including non-discrimination.
- The need to maintain a safe and healthy working environment for employees.
- The prevention and reporting of incidents of bribery and corruption in the supply chain.

FARMASYN considers the continuous improvements and updates of this Code as self-

evidence because this way it ensures that its Associates (natural or legal persons) comply with the appropriate practices in the course of their activity. To this end, FARMASYN reviews and evaluates all its Employees and Associates. These reviews as well as their results are subject to continuous evaluation by FARMASYN 's Competent Compliance Officers while corrective action plans are implemented on an as-needed basis.

FARMASYN is entitled to end its professional relationship with any Employee and/or Associate who does not comply with and violates this Code and/or does not cooperate with the Competent Compliance Officers of FARMASYN.

## **2. Personal data Protection**

FARMASYN considers its absolute duty to acknowledge and respect the privacy of its Employees and Associates in order to protect their personal data at all stages, from their collection, to their processing and storage and also at the end of the pre-agreed data acquisition time. It is expressly stated that the personal data collected should be kept on file for no longer than is necessary. FARMASYN has in place programs and procedures to ensure the current legal regulations for the protection of privacy and personal data worldwide, including the General Data Protection Regulation of the European Union (GDPR) and by extension, provides data subjects detailed information about their rights. All FARMASYN Employees and Associates must show the same respect and guarantee data protection and privacy. In the event that any FARMASYN employee has doubts regarding the personal data collection and processing, he/she must submit a relevant report immediately, requesting relevant guidance. If any FARMASYN Employee and/or Associate becomes aware of an unwanted incident regarding the personal data processing he/she must report it immediately to the Competent Persons.

## **3. Anti-Corruption Ethics & Compliance Oversight**

The compliance and anti-corruption policies of FARMASYN are drawn up in the best interest of patients and by extension to achieve continual improvement in medical practice.

It is considered as self-evidence that every FARMASYN Employee and/or Associate must observe these policies, and strictly comply with all relevant superseding domestic and foreign legal provisions. Such provisions include: a) the Greek Penal Code and the provisions concerning criminal offences of bribery, b) the UK Bribery Act 2010, and c) the United States Foreign Corrupt Practices Act ("FCPA"), without excluding any other applicable provisions.

The primary concern of FARMASYN is to ensure that Compliance Officers perform continuous assessment and monitoring of compliance and that its Board of Directors is briefed on all the relevant findings. FARMASYN is committed to provide training to all of its Employees and/or Associates, as well as perform risk assessments. For this reason,

FARMASYN must see to it that its Employees and/or Associates adopt and adhere to the compliance program and it therefore has in place a crime reporting system and ensures absolute confidentiality without fear of retaliation.

**3.1. Bribery prohibition:** All forms of bribery and corruption are strictly prohibited. The Employees and Associates of FARMASYN must act based on commonly accepted rules of ethical conduct and must always comply with applicable national anti-corruption laws and regulations. Under no circumstances will the Employees and Associates of FARMASYN be permitted to act in a misleading and deceptive manner and should never directly or indirectly engage in bribery, fraud, money laundering or any other corrupt actions to obtain improper advantage. In particular, under no circumstances is it permitted to offer or accept money or gifts, nor to provide services or hospitality with intent to obtain illegal benefits or to influence any decision of a public or private employee. If any employee or Associate of FARMASYN becomes aware of any incident of corruption or even suspicion of such an action, he/she must report it immediately. The Associates of FARMASYN must not encourage other Associates to violate the Code of Ethics which is published on the "Teams" hub for team collaboration, as well as the ISO 9001 Quality Management System, posted on the company server.

All FARMASYN Employees and Associates without exception must comply with the legal framework against corruption. Based on the above mentioned in section 3 of the present provisions, it is expressly prohibited to offer, promise or accept any gift, direct or indirect compensation to/from any public officials in order to obtain or maintain a commercial advantage. Any criminal behaviour of FARMASYN Employees and Associates involving improper advantages to public officials will be reported immediately to the competent persons. For this reason, the Employees and Associates of FARMASYN, especially those whose field of activity includes dealing with public officials of an independent country must understand and adopt the principles and rules laid out in this Code of Ethics.

**3.2. Obligation to prevent and report criminal incidents:**

FARMASYN Associates must have robust and effective systems to report illegal activities. All FARMASYN Employees and Associates must report any information that comes to their knowledge which is related to criminal behaviour and is directly or indirectly connected to the business activities of FARMASYN to the competent company officers of FARMASYN.

**3.3. Whistle-blower protection:** FARMASYN is committed to have at the disposal of all of its Employees and Associates a completely confidential reporting mechanism to report corruption and/or harassment in the workplace, while it requires that its Associates have a similar mechanism to protect the anonymity of whistle-blowers.

**3.4. Continuous disclosure obligations:** FARMASYN Employees and Associates must also notify FARMASYN if they become aware of any provision or promise or

acceptance of any benefit to a public official as an inducement for an action which is illegal soliciting an advantage for FARMASYN, which either has occurred or is about to occur.

**3.5. Data validity obligation:** FARMASYN Associates are committed and obliged to provide the appropriate guarantees that all the information they provide is absolutely accurate, true and valid and that under no circumstances is there a risk of deceiving FARMASYN, otherwise FARMASYN reserves a right of recourse against them to claim damages.

**3.6. Business Commitments and Obligations:** FARMASYN Employees and Associates also have these commitments and obligations:

- To prevent any improper behaviour which may directly or indirectly put FARMASYN at risk of unwanted litigation.
- To prohibit the provision of any information, which according to the existing legal framework governing commercial transactions may put FARMASYN at risk of unwanted litigation.
- To fully comply and prevent any legal entanglement of FARMASYN related to sanctions specified in Directives and Regulations of the European Union, the United Kingdom, the United States of America and any other country with jurisdiction over activities undertaken in relation to this Code.

**3.7. Commercial transactions with public officials and third parties:** FARMASYN must have prior knowledge and give its full consent to all commercial transactions that FARMASYN Employees and/or Associates undertake on behalf of the company with persons working for the Public and/or Private Sector. Especially with regard to the Public Sector and in particular Healthcare Professionals, strict compliance with the current legal framework is required in order to avoid incidents of bribery and corruption.

**3.8. Fair competition:** All FARMASYN Employees and Associates without exception agree and warrant that they will not engage in any competitive behaviour that may unlawfully affect pricing or market share. If any authority, competitor, distributor, supplier or other third party raises any issue in relation to competition against any FARMASYN Employee or Associate, or if the FARMASYN Employee or Associate detects any illegal competitive activity he/she must report it immediately in order to seek specific legal advice. In any case, all FARMASYN Employees and Associates without exception commit to fully comply with the applicable antitrust law and the regulations of the competent Competition Commission and to not engage in unfair competition practices in any way.

**3.9 Ensuring confidentiality of information:** The FARMASYN Employees and Associates must safeguard and secure with due care and attention all confidential

information that comes to their knowledge, as well as the interests and intellectual property rights of the Company, which constitute its valuable assets. For this reason, the confidential information that belongs to FARMASYN can be disclosed only if a prior confidentiality agreement has been signed, unless it is requested to disclose the Confidential Information in connection with a legal or administrative proceeding. FARMASYN Employees and Associates have a duty of confidentiality both during their work and after their potential departure from FARMASYN. In the event that any FARMASYN Employee or Associate becomes aware of an unauthorized disclosure of confidential information or a violation of intellectual property rights, he/she is obliged to report it immediately to the Competent Officers of FARMASYN.

#### **4. Sales and Marketing**

All FARMASYN Employees and Associates without exception must comply with applicable laws, regulations and codes in relation to advertising and interactive activities with patients, Healthcare Professionals and other Authorities. In particular, all advertising material and advertising activities carried out must be reasonably pre-approved by the competent authority, in accordance with the definitions and any requirements of the applicable legislation as well as the EOF regulations (circulars). In addition, it is allowed to conduct interactive activities with Healthcare Professionals, organizations and other authorities, in compliance with the legislative and regulatory rules and mainly considering the best interest of the patient and the protection of public health. If any FARMASYN employee or associate finds that any promotional activities or interactive activities with patients, Healthcare Professionals, organizations or other authorities are non-compliant, he/she must report this non-compliance immediately.

#### **5. Conflict of Interest**

All employees of FARMASYN without exception must act in the best interest of the Company. In particular, they must make decisions based solely on objective criteria and their professional judgement, while at the same time they must try to avoid situations where their loyalty may be compromised and there is a conflict of interest between their personal interests and the interests of FARMASYN. Furthermore, FARMASYN Employees should not abuse their position or their role at FARMASYN for personal benefit or for the benefit of relatives or other persons with whom they have a personal relationship. They should also not accept money, gifts, services or hospitality that compromise their independence or professional judgement. In the event that any FARMASYN employee or associate detects any conflict of interest, he/she must report it to the company immediately.

#### **6. Labour Rights**

**6.1. Guiding Principles:** FARMASYN requires its Employees and Associates to comply

with applicable Laws and to act with business ethics as their full business priority, the promotion of patient health, in a safe work environment where labour rights are respected.

**6.2. Child labour:** Child labour is strictly prohibited. It is only allowed to conduct training seminars as long as they are in full compliance with the applicable legislation. It goes without saying that it is strictly prohibited that the FARMASYN Associates hire workers whose age is below the minimum age for employment in the country where the work is carried out.

**6.3. Forced labour, human trafficking and slavery:** Forced labour and any type of trafficking or exploitation of workers by FARMASYN Associates is expressly prohibited. A necessary condition to perform work is that the employment relationship is only based on the free will of the employees, who possess an inalienable right to resign with reasonable notice. It is forbidden for FARMASYN Associates to deliver and retain documentation that contains sensitive or non-personal data of employees, even if it is only for a simple review, and this is only allowed if an administrative action is carried out.

**6.4. Wages and Benefits:** FARMASYN Associates must comply with the applicable labour legislation, which involves, among other things, the timely payment of the agreed legal remuneration to their employees as well as the payment of additional compensation in certain cases.

**6.5. Work hours:** As part of the obligation that FARMASYN and its Associates have to comply with labour law, it is forbidden for workers to work more than the legally established hours while it is mandatory to provide legal leaves.

**6.6. Non-discrimination:** FARMASYN Employees and Associates must report to the Company any incident that comes to their knowledge and is related to discrimination and/or harassment and/or support the victims in the workplace. In particular, any kind of discrimination and harassment that may be perceived as an inhumane or degrading treatment against any employee or potential employee is expressly prohibited, both during the recruitment period and during his/her employment. Discrimination means any kind of racial or religious discrimination as well as any kind of discrimination related to political beliefs or other opinion, national or social origin, health, sexual orientation, nationality, ethnicity or birth, a person's age or any other distinctive features. There are many types of harassment including physical, psychological, verbal or any other type.

**6.7. Fair treatment:** It is FARMASYN's duty to respect the dignity of every employee. For this reason, the physical, verbal or psychological harassment of Employees and Associates through threats of violence, sexual or unreasonable restrictions when entering or leaving the workplace is strictly prohibited. The right to freedom of expression is sufficiently protected so that all FARMASYN Employees and Associates feel safe without any risk of sanctions and reprisals. Regarding the prohibition of violence and harassment in the

workplace, as well as the process of handling related reports, after prior consultation with its Employees, FARMASYN has drawn up independent Policies to Prevent and Fight Harassment, which are posted on the "Teams" hub for team collaboration, as well as on the ISO 9001 Quality Management System posted on the company server.

**6.7. Immigration compliance:** The right to hire and work is only available to natural persons who are entitled to it based on the labour law, while foreign natural persons in particular must prove that they have the required residence and work permit in the host country.

**6.8. Freedom of Association:** Workers also have the inalienable right to found and/or participate in a legal trade union or union of their own choice and therefore any reprimand, harassment or punishment they may suffer simply on the basis of their participation in such legal labour organizations is strictly prohibited.

## **7. Patient safety and healthcare**

All FARMASYN Employees and Associates without exception acknowledge how important it is to ensure the health and safety of patients. For this reason, they must comply with all applicable procedures designed to ensure patient safety (Good Laboratory Practice, GLP, Good Pharmacovigilance Practice, GPvP, Good Distribution Practice, GDP) and to immediately report to the company any adverse reactions or complaints regarding products distributed by FARMASYN or any falsified (counterfeit) medicines.

**7.1. Working environment:** FARMASYN both on its own behalf and on behalf of its Associates has the mutual obligation to provide and its Employees have the inalienable right to enjoy a safe and healthy environment (such as access to clean sanitary facilities and drinking water), and must take appropriate measures to avoid occupational accidents. FARMASYN and its Associates must also provide its employees periodic training on safety issues.

**7.2. Worker protection:** FARMASYN and its Associates must carry out regular inspections, provide safe work conditions and take appropriate protective measures in order to mitigate health and safety risks in the workplace with the ultimate goal to protect workers from any exposure to chemical, biological and physical hazards, as well as from physically demanding tasks in the workplace. Exceptions are any risks that are not reasonably foreseeable, but in this case both FARMASYN and its Associates must provide their employees with the appropriate personal protection equipment before undertaking each individual task.

**7.3. Briefing of employees and emergency situations:** FARMASYN and its Associates have the duty to draw up emergency plans, to minimize the impact in emergency situations and consequently to provide periodic training to employees on how to protect

themselves from possible risks related to hazardous materials, including raw materials, isolated intermediates, derivatives, solvents, cleaners and waste.

## **8. Environment**

All FARMASYN employees without exception must comply with applicable environmental, health and safety laws, regulations and policies. FARMASYN must conduct its business activities in a manner that protects the environment, health and safety. For this reason, the FARMASYN employees and Associates must take personal responsibility for the environment, health and safety and take into account environmental issues as well as occupational health and safety issues while they carry out their daily work. In the event that any employee or Associate of FARMASYN becomes aware of any actual or potential environmental, health and/or safety issue which may influence the business activity of FARMASYN, he/she must report it immediately.

**8.1. General Principles:** FARMASYN considers that environmental issues are of the highest priority at all levels of its business activities, and thus demonstrates full compliance with the current legal framework. For this reason, all FARMASYN Employees and Associates are required to provide upon request absolutely accurate, true and valid information regarding product materials in order to ensure the Company's compliance. All FARMASYN Employees and Associates must demonstrate similar environmental awareness in order to minimize environmental impact.

**8.2. Environmental permits and record keeping:** In order for FARMASYN Associates to continue cooperating with FARMASYN smoothly and without any interruptions, they must have and keep in force all environmental permits required by law.

**8.3. Effective management and disposal of dangerous substances:** FARMASYN 's Associates bear a similar obligation to hold and to maintain in force all legally required documents regarding safety when handling hazardous substances. In particular FARMASYN Associates must comply with Regulation No. 1907/2006 of the European Commission on the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH). They also must identify and effectively manage chemicals and other environmentally hazardous substances. Similarly, they must hold training meetings with their employees on the safe handling and disposal of hazardous substances, the monitoring of sewage or solid waste as a result of their work.

**8.4. Continuous Improvement:** FARMASYN also is committed to minimize and/or eliminate negative environmental impacts by using environmentally friendly methods and raw materials. The Associates of FARMASYN are also bound by the same commitment in their own activities. Proposals to improve already existing procedures regarding the protection of the environment are considered as completely legitimate.

**8.5. Corrective measures:** FARMASYN continuously re-evaluates the rules and principles set forth in this Code, and by extension the compliance of FARMASYN Employees and Associates. For this reason, FARMASYN is authorized to have access to the facilities of its Associates, based on their prior consent, in order to check the degree of



compliance with the present requirements. In the event that the compliance of FARMASYN Associates with this Code is found to be faulty, the Associates must draw up a plan to take corrective measures to remedy any wrongdoings. In the event that FARMASYN finds that its Employees or Associates do not comply with this Code or do not remedy any violations thereof, then FARMASYN is entitled to immediately terminate its business relationship with any of its Employees and/or Associates without incurring any penalty whatsoever.

## **9. Warranties:**

The Employees and Associates of FARMASYN are required to provide the following warranties:

- To fully comply with the obligations expressly laid out in this Code.
- To carry out their activities in such a way as to ensure the lawfulness, transparency and protection of FARMASYN 's prestige, business reputation and credibility when they transact with any third party.
- To act lawfully and in compliance with national and supranational legislation in order to ensure the unhindered exercise of FARMASYN 's activities and avoid exposure of the Company vis-à-vis the competent Authorities.
- To show due respect and appropriate awareness of environmental issues, as well as to comply with their legal obligations in relation to any criminal behaviour that comes to their knowledge regarding corruption, harassment in the workplace, unequal treatment and discrimination of employees and forced labour.
- To comply with the General Personal Data Protection Regulation to protect all data that comes to their knowledge and/or that they process.
- To request or to provide appropriate workplace training so that all employees are able to have a comprehensive understanding of each topic covered in this Code.

## 10. How to report Corruption, Harassment, or Breach of the Law, the Policies and the Procedures

You can report anonymously and confidentially any breach of the Company's Internal Policies and Procedures as well as any violation of the applicable law which involves any criminal behaviour, act or omission including corruption, bribery, financial crimes, money laundering, as well as behaviours, actions or omissions that are contrary to the Company's Code of Ethics and are generally any violation of human rights, personal data, violence and harassment in the workplace, using these reporting channels:

- i. Electronic Regulatory Compliance Form ([www.farmasyn.gr](http://www.farmasyn.gr))
- ii. **E-mail:** [yourvoice@farmasyn.gr](mailto:yourvoice@farmasyn.gr)
- iii. **Tel.:** 210 57 88 784 (Monday to Friday: 8am to 4pm)
- iv. By **mail** to the following address: Farmasyn - Thesi Rikia - Aspropyrgos - 19 300 - Regulatory Compliance Department

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Managing Director