

PREVENTION- CORRUPTION

**WORKING WITH MEGAPHARM MEANS THAT WE MUST ALWAYS
ACT WITH INTEGRITY TO ENSURE THAT WE HAVE THE TRUST
OF OUR CUSTOMERS, COLLEAGUES AND BUSINESS PARTNERS.**

"TRUST UNDERPINS EVERYTHING WE DO."

EXPECTATIONS

- *behave ethically, take pride in your actions and decisions*
- *comply with the principles and rules of our 'code of conduct' and meet your legal and regulatory obligations* If you are a manager, you have an important role in ensuring that the 'code of conduct' is understood and applied by your team.

In particular, we expect you to:

- *be a role model for “doing it right”*
- *ensure that your team members know and understand our code*
- *hold your team members accountable for implementing our code.*

Our business principles | Individual behavior

We act with honesty, integrity and fairness in our work, both in internal and external relationships. We do not tolerate any form of bribery, including improper offers of payment or gifts to or from employees. We avoid all contracts that may lead to, or suggest a conflict of interest between personal and business activities. We neither give nor receive hospitality or gifts that may appear to carry an obligation. We develop mutually beneficial relationships and strive to promote the implementation of our business principles with our business partners.

***"MEGAPHARM HAS ZERO TOLERANCE FOR BRIBERY:
NO MEGAPHARM EMPLOYEE SHOULD GIVE OR RECEIVE BRIBES
IN ANY FORM.
BRIBERY IS NOT ONLY ILLEGAL BUT ALSO UNETHICAL."***

CONFLICTS OF INTEREST

If you find yourself in a situation where your personal and business interests may conflict, you must declare these potential conflicts, obtain approval for them. Any conflict of interest must be avoided/eliminated. To help you decide if you are facing a potential conflict of interest, imagine explaining your actions to a friend, colleague, or the media, and ask yourself whether or not you would feel comfortable. Your manager will be able to help you determine if a conflict exists.

Here are some examples of conflicts of interest:

- any activity outside of business that affects your ability to devote adequate time and attention to your responsibilities within Megapharm*
- recruiting an individual because of his important political connections which are supposed to generate benefits for Megapharm*
- a personal interest in a client or competitor that influences your work decisions*
- using Megapharm resources for political activities.*

GIFTS AND HOSPITALITY

We support the reasonable and proportionate giving and receiving of hospitality in the normal course of business dealings. However, we prohibit giving or receiving gifts and hospitality if they are excessive or unreasonable. We must make sure that we are never influenced, or seek to be influenced, by means of gifts or hospitality. For example, we do not give or receive gifts or hospitality during a tender process or during negotiations for a new contract.

INFORMATION PROTECTION:

All documents, presentations and emails are essential business information that must be protected. Information that is circulated within the company only as needed for information or, for third parties, on the basis of a non-disclosure agreement. Breach of security would lead to reputational damage and significant financial loss. Examples include: customer and personal data, commercial agreements and product information.

