

Adamed Code of Ethics





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Adamed's success is not only about results and business efficiency, but primarily about **its reputation as an ethical and trustworthy company.**

It is obvious to us that our business must be conducted in a lawful manner. We are well aware, however, that this is not enough to create the company of our dreams. Apart from legislation, the **areas that are important for Adamed include good habits, industry standards and universal values, social standards and ethical principles that promote the creation of a reliable and trustworthy company.**

We expect the same from our counterparties and business partners.

We want all our associates to be familiar with and understand the principles of the Adamed Code of Ethics. We conduct training and require everyone to apply the rules of the Code in their daily work. The Code is available on our website.

OUR MOTTO:

'The way we do business is just as important to us as market efficiency. We believe that only a business based on values and ethical standards can have long-term market success.'

ADAMED VALUES

Our Values:

- **Mutual Respect,**
- **Operational Excellence,**
- **Flexibility and Speed of Action,**
- **Quality,**
- **Openness and Innovation.**

Adamed Values reflect the culture of our company and are its foundations. They have been developed jointly by everyone in our company and support daily work, people-to-people and inter-area cooperation, as well as decision-making.

1) MUTUAL RESPECT

- showing empathy and understanding of other points of view and cultural differences,
- recognising and responding to the emotions of others in an appropriate and responsible way,
- listening skills and sensitivity towards our fellows,
- providing mutual feedback,
- appreciating others.

2) OPERATIONAL EXCELLENCE

- building the company's value through effective and timely execution of objectives and tasks,
- responsibility for decisions and actions initiated,
- continuous improvement of existing processes and personal competencies,
- planning with consideration of the international dimension.

3) FLEXIBILITY AND SPEED OF ACTION

- proactive attitude and ability to implement solutions quickly,

- accepting changes and recognising the opportunities that they bring,
- capability to modify priorities,
- ability to analyse situations, make prompt decisions and take full responsibility for them,
- ensuring effective communication flows across all areas and countries.

4) QUALITY

- caring for every detail of the work performed,
- showing dedication and due diligence in completing all objectives and tasks,
- continuous improvement of knowledge and skills,
- compliance with adopted standards throughout Adamed.

5) OPENNESS AND INNOVATION

- active searching for new non-standard solutions aimed at increasing the company's value and uniqueness,
- readiness to embrace challenges,
- initiating cooperation that extends beyond the boundaries of one's own area of activity,
- sharing knowledge, experience and best practices among all Adamed's entities, companies and representative offices on foreign markets.

ADAMED ETHICAL PRINCIPLES

1) WE CARE FOR PATIENTS' WELFARE

- Patients and their needs are always at the centre of our attention.
- In research and development, we search for solutions that respond to the challenges faced by modern medicine.
- We strive to provide patients with widely-available modern therapies and seek innovative solutions to meet the needs of the sick.
- Regardless of the type and availability of the product manufactured at our facilities, we are always aware of our special responsibility for the life and health of patients. We give absolute priority to constant care for the highest quality and safety of therapy. We strive to ensure that our products meet all the applicable quality standards by implementing effective control systems. We diligently monitor, evaluate and report adverse reactions. We deal with all complaints or concerns timely and thoroughly to ensure that the person who made them known obtains an exhaustive answer.
- We object to unfair advertising. Our advertising materials are put through a detailed substantive, medical and legal review.
- We initiate educational campaigns that address important issues in the field of prevention and healthcare.

2) WE SUPPORT SCIENTIFIC THOUGHT AND ACT IN COOPERATION WITH THE SCIENTIFIC COMMUNITY

- We strive to achieve a more far-reaching cooperation between business and science that will bring mutual benefits, with patients as ultimate beneficiaries.
- We collaborate with universities and scientific institutes. We cooperate with scientists in our search for new drugs for illnesses which so far lack effective therapies, as well as in our efforts to improve existing therapies and conduct activities that promote prevention and healthy lifestyles.
- By initiating and getting involved in educational programmes, we support young talent. We want to actively participate in shaping the awareness of young people. Through our actions aimed at boosting the popularity of exact sciences, we encourage them to embrace new challenges and introduce them into the fascinating world of science. We believe that it is young people who are the future of innovation, and by supporting education, we are co-creators of a higher standard of life for the present and future generations.

3) WE TAKE DECISIONS WITH A SENSE OF SOCIAL RESPONSIBILITY

- We are aware of the importance of our business, locally, nationally and internationally. We take all decisions with a sense of social responsibility and believe that it is the only attitude that will ensure Adamed's sustainable development.
- We support local communities and initiate campaigns on important issues in the field of disease prevention and healthcare.
- We conduct educational and scientific programmes to boost the popularity of exact sciences and natural sciences among young people.

4) WE ACT IN ACCORDANCE WITH THE PRINCIPLES OF FAIR COMPETITION

- We aim to develop our market advantage in a legal and fair manner. We want our market success to be determined primarily by: innovation of our solutions, high quality of our products and services, expertise and high level of ethics of our business activities.
- We conduct all discussions and negotiations in good faith, with care for conversation etiquette and respect for good business practices. We do not abuse our market advantage or financial power. We preserve the secrecy of negotiations.
- We select our counterparties and business partners on the basis of objective criteria for the evaluation of the offers they submit and we ensure fair comparison of the cooperation proposals. We strive for clarity and transparency in our purchasing procedures.
- We perform the obligations we accept in a reliable and timely manner.
- We protect confidential information entrusted to us by our counterparties. We do not discredit our counterparties and we do not undermine their reputations.
- We do not allow our associates to share or disclose confidential information owned by their former employers, or use such information for our own needs.
- We get involved in ethical industry initiatives.
- We strive to settle any disputes amicably.

5) WE DO NOT ACCEPT ANY FORM OF CORRUPTION

What is corruption?

By corruption we mean promising or giving a financial or personal benefit of any kind, to a person performing public functions or specific functions within a unit conducting a business activity, as well as requesting or accepting a benefit of such a person, in exchange for achieving specific objectives, regardless of the place of such actions, and whether or not such actions are undertaken directly or indirectly.

Corruption distorts the operation of healthy market mechanisms, violates fair competition rules by promoting improper behaviour, lowers ethical standards and reduces the mutual trust between trading participants, thereby contributing to the development of social inequalities and weakening the economy.

- We reject corruption and do not accept any of its forms, and implement effective prevention mechanisms. We abide not only by the laws, but also by the internal rules of conduct in situations that give rise to risks of corruption. In our interaction with the medical community, we also comply with the provisions of the '*Code of Conduct on Interactions with the Healthcare Community*' of the European Generic Medicines Association, which establishes ethical standards for the relationships between pharmaceutical companies and representatives of medical communities.
- None of our decisions may be made on the

basis of corrupt activities.

- We do not initiate or engage in any corrupt activities in Poland or abroad, either on our own or indirectly through our associates, partners or counterparties.
- We shall at all times ensure lawfulness, transparency and integrity in our interaction with persons exercising public functions, persons authorised to issue prescriptions or trade in medicinal products, persons who manufacture or have influence on the trade of products funded from public funds, persons authorised to issue prescriptions or orders for such products or those supplying such products to healthcare providers, as well as in our interaction with healthcare providers or the representatives of healthcare providers.
- We are also aware that corruption is not only a phenomenon in the public sphere, but can also occur in private business. We promote ethical attitudes within the company and in relationships with our counterparties and business partners.
- We do not allow corruption mechanisms to be established to finance costs or to provide illegal financial or personal benefits, including any benefits from business assets.
- We record all transactions in the accounting records and registers in a way that complies with applicable legislation.
- We are all responsible for the implementation of an effective anti-corruption system in the company, through our daily compliance with the internal procedures and anti-corruption guidelines. In case of any suspected unethical behavior, we use the relevant internal reporting procedure.
- We expect our associates, counterparties and business partners to respect our principles. We do not want to cooperate with any persons or entities who do not share our views on anti-corruption

issues.

- If in doubt whether a given conduct may give rise to a risk of corruption, we consult the Legal Department and the Compliance Manager.

6) WE COMPLY WITH THE GIFT POLICY

- We do not give gifts or provide hospitality to people exercising public functions. For people authorised to issue prescriptions or those trading in medicinal products, we may give items or offer hospitality only to the extent and in situations provided for by law and on the condition of compliance with the ethical standards specified in our internal procedures and guidelines.
- In relationships with our counterparties and business partners, we may offer and accept hospitality or small gifts of a minor value only within the accepted legal limits, if it takes place in a transparent manner and with the purpose of building business relationships on the basis of mutual respect, and occurs in situations when it is generally accepted as a part of business etiquette. A gift or hospitality must not be accepted or offered with the purpose of exerting influence on the recipient, or in exchange or as a reward for specific conduct or lack of it. In particular, such gifts or hospitality should not be accepted or offered in exchange for the recipient's abuse of his/her powers or his/her non-performance of any obligations binding on him/her that may cause harm or constitute an act of unfair competition or an unacceptable preferential act.
- Any gifts and hospitality must be appropriate and comply with the Adamed gift policy. The type of gift or hospitality or way of its provision must not create any ambiguous or awkward situations.

A gift must not be money or its equivalent. No-one should be induced to accept a gift or hospitality if he or she does not wish to do so.

7) WE AVOID CONFLICT OF INTEREST

What is conflict of interest?

We understand conflict of interest to be a situation in which the existence of a certain obligation or relation hinders or prevents the associate from making an objective decision in accordance with the best interests of our company. Personal interests should not affect any decisions that we make as part of our official duties.

- Any existing or potential conflicts of interest should be disclosed in an appropriate manner. If we become aware of a conflict of interest that involves us, we notify our superior. If we suspect that there is a conflict of interest that may affect another person in the company, other than ourselves, we notify the Compliance Manager. The identification of an existing or potential conflict of interest should make the person concerned refrain from making any decisions that might be affected by the conflict.
- In relationships with counterparties and business partners, we always assume a professional attitude and strive to ensure that such relationships do not cause any conflict of interests.
- We avoid engaging in any endeavours we should not participate in, as such engagement could affect the objectivity of decisions made as part of our official duties at Adamed.
- We avoid engaging in personal relationships with our superiors and subordinates, if such relationships could affect our performance of official duties, in particular any decisions that we make.

8) WE CREATE OUR WORKING ENVIRONMENT WITH CARE

- We want to create friendly and engaging working environment based on common values.
- We treat others the way we want to be treated.
- We are able to admit our errors and draw conclusions for the future. If there is an error or other irregularity, we analyse the causes and implement corrective measures.
- We respect the work of others. We report any remarks or concerns in a correct manner, in a factual and constructive way, avoiding evaluative language.
- We express our opinions with both courage and tact, abiding by an appropriate discussion etiquette and, in particular, respecting different opinions and beliefs.
- We ensure compliance with electronic communication etiquette in accordance with internal guidelines.
- We do not tolerate any form of discrimination. We actively object to any discrimination, both direct and indirect, in the working environment, in particular discrimination on the basis of gender, age, disability, race, religion, nationality, political opinion, trade union membership, ethnic origin, faith, or sexual orientation.
- We respect diversity and appreciate the value it brings to everyday work.
- We try to resolve any conflicts by way of dialogue and mutual understanding.
- We strictly respect the dignity and privacy of others. We do not inconvenience our associates with behaviour and comments that may put them in an embarrassing or awkward situation. We actively object to mobbing and sexual abuse by reporting any cases witnessed.
- In chief officer, executive and managerial posi-

tions, we strive to provide positive feedback, set a good example and promote ethical attitudes in our team. We provide our subordinates with advice and support in difficult and ambiguous situations.

- We care for the property entrusted to us for the purpose of performing our official duties. Using any business property for private purposes is only allowed in the cases and within the limits defined in the relevant internal procedures.
- We protect the company's secrets. We protect any technical, technological, organisational or other information that presents commercial value, and has not been disclosed to the public, from unauthorised access, and within the company, we share such information with other associates only on the "need to know" basis.
- We do not discuss confidential business matters with any persons outside our company or in public places, if this may lead to the information being disclosed to any unauthorised persons. We use the Internet and social media cautiously. We do not publish any statements, reports or photos related to our professional work on the Internet or social media sites without relevant approval.
- We use our business email reasonably and only for business purposes.
- We respect copyright and other intellectual property rights.
- We ensure health and safety at work through the systematic monitoring of the occupational health and safety threats and the promotion of a culture of safe behaviour. We observe the rules of conduct in threatening situations.
- We create an environment that promotes development, education, improvement of professional qualifications, and internal promotions.

- We promote healthy lifestyles. We encourage our associates to take up sports and recreational activities by supporting different forms of physical activity, also financially.

9) WE CARE ABOUT THE SAFETY OF INFORMATION

- We use business equipment in accordance with the law and internal procedures, and in such a way as not to harm others.
- We use communication systems and Internet resources reasonably.
- We take responsibility for the textual, audio and graphic content of the information that we transfer.
- We do not use business information for private purposes.
- We do not use illegal software.
- We do not try to get access to information we are not entitled or authorised to obtain.
- We do not harm the company's systems or its IT resources by disseminating harmful codes or corrupting files.

10) WE REPRESENT THE COMPANY WITH DIGNITY

- In performing our duties, we always act in the company's best interests and maintain its good reputation.
- We do not publicly discuss issues concerning the company without relevant approval.
- In the private sphere, we avoid referring to the fact that we are Adamed associates, and in particular, we do not publish private opinions on the Internet referring to our employment at Adamed.
- During business and training trips, we remember that we represent Adamed and therefore, avoid behaviour that may harm the company's reputation.

- If we engage in political or social activities, we do not use or refer to the fact that we are employed at Adamed for the purposes of those activities.

11) WE PROTECT PERSONAL DATA

- We respect the right of our associates, counterparties, partners and other individuals to protect their personal data.
- We inform the relevant individuals about the collecting and processing of their personal data, making it possible for them to make a conscious decision, express consent and use the rights to which they are entitled.
- We collect and process personal data only for specific purposes as permitted by law, protecting the said data from any unauthorised access.

12) WE CARE FOR THE NATURAL ENVIRONMENT

- We make the obligation to protect the natural environment a part of our business activity. When we consider our company's environmental impact, we take into account the entire life cycle of our products. From manufacturing, through distribution, to the recycling of packaging, we strive to minimise the negative impact on nature and the environment wherever possible.
- We limit the amount of printed materials.
- We save heat and electrical energy.
- When purchasing new equipment, we always check the effect of its operation on the environment.
- We invest in modern technologies and raw materials that meet environmental protection requirements.

13) WE WANT TO BE A POSITIVE EXAMPLE OF THE SUCCESS OF THE POLISH ECONOMY

- As we expand our business to foreign markets, we have become responsible representatives of the Polish economy, thereby encouraging foreign counterparties to establish cooperation with Polish enterprises and invest in Poland.
- We prove that native products can be associated abroad with innovation, breakthrough technologies and advanced scientific thought.
- When we operate in foreign markets, we comply with local laws and good business practices. We always act with respect towards local culture, customs and diversity.

ETHICAL BEHAVIOUR TEST

If you are wondering whether the course of action you are contemplating is compliant with the principles of the Adamed Code of Ethics, you can use the following test before you take any action.

QUESTION	YES	NO
Supposing my behaviour was described by the media, would it harm the reputation of Adamed as a company committed to honest and ethical conduct?		
Supposing my behaviour became known to my family, would I have reason to feel ashamed or embarrassed?		
Supposing our competitors behaved this way, would I consider it unethical?		
Would I object to an associate treating me the same way?		
Would I object to our partners or counterparties behaving the same way towards us?		

If you answered 'YES' to any of the above questions, do not proceed with this course of action or consult the Compliance Manager.

e-mail: compliance@adamed.com

RESPONSIBILITY

- 1) All associates are obliged to abide by the Adamed Code of Ethics.
- 2) All associates are obliged to familiarise themselves with the content of the Adamed Code of Ethics, participate in training related to it and apply its rules to their daily work.
- 3) Holders of chief officer, executive and managerial positions have a special role in the company. They should set a good example and provide guidance to their subordinates in the spirit of the principles specified in the Adamed Code of Ethics.
- 4) The person responsible for the implementation of the Adamed Code of Ethics in the company, including, in particular, the provision of training, is the Compliance Manager.

