

Protecting Yourself & Our Business



Mundipharma Ethics & Compliance





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Mundipharma has a long history of being a compliant and ethical organization. We place great importance on this, which is why this document exists. It is designed to not only protect the business we all work for but also to protect you.

While we have been exercising good and thorough compliance and management, we want to raise the bar even higher to improve and embed a reliable system of compliance that is owned by all of us.

To achieve this, we have taken steps to further strengthen our compliance culture across the region by refreshing our Code of Business Ethics. It will help us remain an ethical and compliant organisation and should become a natural part of our processes and procedures, and how we do business.

The Code applies to everyone at every level, in all our markets and across all functions across the region. All of us at Mundipharma should understand and recognize our individual and collective responsibility for compliance. I cannot emphasize enough how integral this compliance program is to our business success, Mundipharma's reputation and to you.

Thank you for thoroughly reading this document, referring back to it and applying its content to your everyday working life.

Raman Singh
Chief Executive Officer
Mundipharma



Mundipharma

Code of Business Ethics

Mundipharma is committed to doing business ethically. It is who we are and part of the Mundipharma culture.

We have a professional and moral obligation to do business honestly, ethically and lawfully. At Mundipharma our ethical culture safeguards our reputation and strengthens the bond of trust that we have with our patients, employees, suppliers, business partners and communities.

What are your responsibilities?

This Code of Business Ethics (“Code”) defines Mundipharma’s standards to help you understand and meet your obligations as a Mundipharma employee. The high standards set in this Code apply equally to our CEO, management and all our employees. It is your responsibility to understand this Code and to make good choices each day. Your compliance team provides training and can answer any questions you may have.

This Code is integral to our business success, and more importantly to Mundipharma’s good name and reputation. It is also here to protect you and your colleagues. Not meeting these ethical and legal standards may result in disciplinary consequences, up to and including dismissal and perhaps legal liability.

The Code cannot address every situation you may face. Not every issue that comes up has a clear path to resolution. In difficult situations use judgment, think about your work as you do it and involve others to help make good decisions.

Speak up and ask questions if you are uncertain about the operation of the Code or if something does not seem right. There are many ways to raise a concern, and the most effective way may depend on the nature of the concern. You can always escalate your concern without fear of retaliation if you do not receive an acceptable response from your first point of contact.



We are fair and ethical and we never offer, give or accept bribes or do business in a corrupt way.

We Are Honest & Fair We Play a Fair Game

We are fair and ethical and we never offer, give or accept bribes or do business in any corrupt way. We avoid situations which could be considered unethical, or appear unethical.

If you are approached or pressured to give or accept a bribe or to engage in questionable behavior you must immediately report it to your manager, to the Legal and Compliance Department or to the Ethics Hotline.

Mundipharma does not generally give or accept gifts. However when allowed, we offer corporate gifts and

hospitality that are low in value, modest and customary. Mundipharma strives to do business with suppliers, distributors and other partners who follow the same high ethical standards.

We diligently avoid conflict of interest situations. A conflict of interest occurs when your personal activities or relationships interfere with or risk compromising your work obligations. It is important that you avoid any real or apparent conflict.



We Follow the Law We Follow the Rules

**We are a good global corporate citizen.
We are committed to fair competition in the marketplace and fair marketing practices.**

Many countries have laws prohibiting business practices that interfere with competition. You should keep your communications with our competitors to a minimum. There should always be a legitimate business reason for such communications. We never talk with or exchange information with our competitors or others to fix prices or terms or behave in any other anti-competitive way.

We co-operate with our relevant regulator and government agencies in connection with investigations, requests for information or site visits.

If you are involved in a regulatory issue you must cooperate fully and coordinate all communication through the Legal and Compliance Department.

We do not make facilitation payments.

Facilitation payments are made to government officials to expedite an administrative process or the approval of a transaction or activity. They are illegal in most countries. If you are asked to make a facilitation payment, make a record of the encounter and report the event to your Manager or to the Legal & Compliance Department or to the Ethics Hotline.





We are passionate about preserving our positive culture.

We Respect Others
We Respect the Other
Members of Our Team

We are Patient Focused
We Provide Better &
Innovative Healthcare

We provide clear, accurate and current product information to patients and consumers and we promote our products appropriately and ethically.

You must always promote the safety, cost or effectiveness of our products in a fair and accurate way.

Mundipharma is an equal opportunity employer.
We will not tolerate discrimination or harassment.
We are proud of our global workforce and are passionate about preserving our positive culture to ensure every individual is treated with dignity and respect.

You are free to do your job without fear of discrimination, harassment or bullying and each of your co-workers is entitled to expect the same. You must not engage in behaviour that is discriminatory or threatens, offends, undermines or insults other employees. Please refer to your Employee Handbook.

We provide a safe and healthy workplace for our teams.

You should be aware of and follow all security and safety guidelines, particularly in relation to the handling of controlled substances.



Protection of confidential & proprietary information is fundamental to our success.

We Are Honest with & Protect Mundipharma Records & Property

Mundipharma respects each individual's right to privacy and we handle personal information only as permitted by law. Many countries have privacy or have personal data protection laws that we follow.

If you access to personal data, you must handle the data in accordance with our data policy and local laws and regulations.

Protection of confidential and proprietary information is fundamental to our success. We protect intellectual property and confidential information that belongs to us and others.

You must not disclose any information or documents without proper authorization. If you are uncertain about whether certain information is confidential, ASK!

Accurate and timely records are vital to our business.

You must record all transactions accurately, completely and in a timely way. This includes all transactions with external entities as well as internal transactions such as employment records. You must never make false or inaccurate entries in Mundipharma records.

We Use Resources Responsibly

Mundipharma assets should only be used for business purposes. You must use all resources responsibly and guard against waste and abuse of company property.

You must use emails, any electronic devices, internal and external communication systems appropriately, lawfully, professionally and in accordance with policy. You should be respectful when using video and social media tools in your working and private capacity.



Ask Questions & Speak Up

Speak up if you see or suspect incidents which violate this Code. You can talk to:

- your Manager;
- the Legal and Compliance Department;
- the Human Resources Department or
- the Ethics Hotline.

The Ethics Hotline allows you to report on an anonymous basis. It is managed by a third party that operates independently of Mundipharma. It is secure and confidential.

All discussions will be held in strict confidence. Mundipharma does not tolerate retaliation against employees in relation to questioning or reporting misconduct.

Training

When you start at Mundipharma, you will be trained on this Code and any local policies and standard operating procedures. Employees may not commence work in the field until they have completed this training.

The Code and local policies and standard operating procedures may change over time so it is important you stay current and up to date and you know how to access them in your region.

