



# Code of Conduct

## Acting with Integrity

6<sup>th</sup> of August 2021: Version 1.0



Within this Code of Conduct, the term “PharmaLex” refers to PharmaLex GmbH, its subsidiaries and affiliated companies. The conduct and compliance standards in this code apply to all employees and officers of PharmaLex.



## MESSAGE FROM OUR CEO

Dear Colleagues,

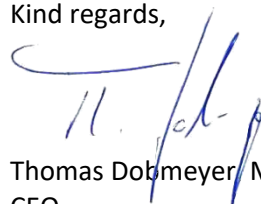
Since PharmaLex's founding in 1994, the company has enjoyed continuous growth and success.

Our firm has always been recognized as an outstanding consultancy and an employer of choice. Today PharmaLex is a truly international company, recognized for operational excellence, professionalism, expertise and quality of work.

We are proud of our firm's achievements to date and aim for the firm to become the leading global life sciences consultancy firm worldwide. Our ambition carries great responsibility. Our profession, success and value creation depend on our clients' trust. In a complex and challenging business environment, trustful relationships are based on competent, considered and reliable action. Respect for laws, regulations and company policies is a priority for every one of us.

To provide clear guidelines for our work and the way we interact with clients, business partners and colleagues, we have put into effect this Code of Conduct. The Code reflects our value statements and describes how we put the statements into practice. Each one of us is called on to act properly and appropriately and to seek advice when uncertainties arise. Today more than ever, ethical behavior, moral action and integrity are the prerequisites for achieving successful business development and for performing outstanding services for our clients. Therefore, we do our best to live up to our values every day.

Kind regards,



Thomas Dobmeyer / MD  
CEO

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## 1 INTRODUCTION

### 1.1 Why a Code of Conduct?

At PharmaLex, the leading provider of specialized services for the pharmaceutical, biotech and medical device industries, compliance is a priority. Our primary objective is to achieve outstanding results for our clients. Our clients trust that their needs have been met, their reputation has been protected and their business objectives are on track.

PharmaLex's Code of Conduct helps us maintain and build on —the trust we have established with our clients and one other—trust that is essential to the success of our business.

Our Code of Conduct, or Code, provides each of us with the rules, tools and resources for making sound decisions in complex business situations.



### 1.2 Everyone at PharmaLex

The Code of Conduct contains important rules and guidelines that apply equally to all employees of PharmaLex regardless of role or seniority. All of us must know and obey the laws and regulations that apply to the work we do and to the countries where we do business. By seeking out additional information, asking questions and conducting our business in accordance with the highest ethical standards, we can be sure we are doing the right things for our company and our clients.

## 2 PHARMALEX COMPLIANCE PRINCIPLES

Our compliance principles are part of our DNA.

- We behave correctly.
- We respect one another.
- We create trust.
- We protect our company.
- We take responsibility as managers.

### 2.1 We behave correctly

We comply with applicable laws of the countries in which we operate, and we ensure the implementation of all company guidelines, processes and controls.

What laws must we obey?

We must be aware of and comply with laws and regulations that apply to our daily work. Those laws and regulations may vary from country to country. If we are uncertain or have questions, we contact our responsible manager, our local Human Resources contact or the chief compliance officer.

What are the consequences of violations for our company and for us as employees?

Violations of laws or failures to comply with the Code of Conduct can have serious consequences for our company and us. The consequences can be in various forms for

Each of us:

- Disciplinary action
- Fines and damages
- Imprisonment.

Our company:

- Damage to PharmaLex's reputation, brand and market value
- Significant fines and damages
- Disgorgement of profit
- Exclusion from public and private contracts.

We ask ourselves the following questions when making decisions for PharmaLex.

- Is it right for PharmaLex? Is it in line with PharmaLex's values?
- Is it legal?
- Could it affect our brand if our decision becomes the subject of media coverage?
- What would the people we care about think of our decision?
- Are we prepared to take responsibility for our decision?

## 2.2 We respect one another

We respect the personal dignity, privacy, and rights of each individual. We believe diversity enriches our workplace. We work together without regard to national origin, culture, religion, age, disability, skin color, gender, sexual identity or orientation, or worldview. We do not tolerate discrimination, sexual or any other form of harassment, or inappropriate behavior toward individuals or groups.

We apply these principles of respect to one other and to third-parties with whom we interact, including our suppliers, clients and business partners.

## 2.3 We create trust

We are open and honest. We take our responsibility seriously, we are reliable and we make only promises we can keep.

We are sincere. We help clarify and eliminate potential deficiencies, problems and misunderstandings. We do everything to keep the trust placed in us by our clients and the users of our services.





What do we do when we make a mistake?

We all make mistakes at work. PharmaLex fosters a culture in which we learn from our mistakes. We deal openly with them so as to prevent them from happening again. And although most mistakes are minor, others could have serious consequences and should be reported.

What do we do if we observe a violation of the Code of Conduct?

We do not look away when we recognize possible violations of the Code of Conduct, even if they do not involve us personally. The company has numerous outlets to report possible violations of the Code of Conduct (see Reporting Procedures). In many cases, timely reporting is important in order to avoid or minimize negative consequences for the company.

## 2.4 We protect our company

We protect and promote PharmaLex's reputation and values, which are essential for our business success and which ensure the sustainable future of our company. If we act illegally or inappropriately, we can cause considerable damage to the company.

## 2.5 We take responsibility as managers

In general, managers are expected to demonstrate personal commitment to the Code by promoting compliance with the Code, policies and guidelines.

Managers at all levels of the organization should:

- Lead by example and ensure all employees are aware of and abide by the Code, other PharmaLex policies and procedures, and applicable laws and regulations.
- Create an open-door environment in which employees feel comfortable asking questions or raising concerns.
- Promptly escalate any known or potential violations of our Code or policies.
- Ensure that all employees are treated fairly.
- Take individual employees' needs and concerns into consideration.



### 3 TEAM AND WORKPLACE AT PHARMALEX

We look after one another.

#### 3.1 Diversity and inclusion / non-discrimination

We believe that diversity and inclusion contribute to our excellence. We strive to recruit people from diverse backgrounds who have exceptional talent and ability.

We do not tolerate any discrimination based on race, color, religion, national origin, sexual identity, gender, gender identity, pregnancy, marital status, age, disability or socioeconomic status.



#### 3.2 Anti-harassment / workplace violence

*Harassment* refers to conduct that has the purpose or effect of creating an intimidating, hostile or offensive work environment for any person or group of people. At PharmaLex, harassment of any kind—whether sexual or non-sexual—is not acceptable and will not be tolerated.

A safe work environment is free from all forms of violence—either actual or threatened—and acts of intimidation or abuse. If you witness an act of harassment or violence, you have a responsibility to report it immediately to your manager or Human Resources.

#### 3.3 Free choice of employment

No one should be employed or forced to work against their will. All forms of forced labor are prohibited.

#### 3.4 Prohibition of child labor

Child labor is strictly prohibited.

### 3.5 Working hours

PharmaLex adheres to all applicable, country-specific working-hours regulations globally.

### 3.6 Freedom of association and collective bargaining

PharmaLex recognizes workers' legal right to form or join existing trade unions and to engage in collective bargaining. Members of employee organizations or trade unions are neither disadvantaged nor preferred. PharmaLex constructively cooperates with employees, employee representatives and trade unions.

### 3.7 Health, occupational safety and security

PharmaLex is committed to providing its employees a safe work environment and to ensuring employees are treated with consideration, dignity and respect. We share a collective responsibility to create and maintain a safe environment for our clients, visitors and coworkers.

An emergency can occur at any time, and PharmaLex's goal is to respond quickly and effectively to such to support our team and their families. Each PharmaLex office has dedicated team members who are trained to prevent, respond to and manage a range of situations. You, too, have a role in knowing your local office practices and emergency procedures.

If you are working in a PharmaLex office different from your own or at a client site, it is best practice to ask about local safety and security procedures (e.g., locations of emergency exits, evacuation meeting points).



### 3.8 Personal security and travel

PharmaLex is active worldwide, including in areas and situations in which the security situation might be critical. If we travel to other countries, it is best practice to identify and analyze global security risks. In case of concern, we talk to our manager.

PharmaLex team members have responsibilities when traveling on business for PharmaLex. All PharmaLex business travel must be booked via PharmaLex's approved travel agencies and vendors. All employees should also be mindful of safety guidances and warnings and be situationally aware—particularly when traveling or when in new surroundings, which is sound daily practice generally.

#### Things to remember

- We observe the safety regulations at our workplace.
- We avoid risky behavior.
- When we recognize dangerous situations, we take appropriate action.
- We educate ourselves in advance about security risks in the countries to which we will be traveling, and we comply with prescribed security procedures and requirements.

## 4 FAIR BUSINESS CONDUCT

We act fairly and reliably and reject all forms of corruption and bribery.

### 4.1 Anti-bribery and anti-corruption

PharmaLex believes in winning business through the strength of our people, our experience, our expertise, our approach and our commitment to excellence and integrity.

We abide by all applicable laws, treaties and regulations that prohibit bribery and other kinds of corruption, including German anti-bribery laws, the US Foreign Corrupt Practices Act and equivalent laws in every country in which we do business. This means all of us are prohibited from any bribery involvement with any person or company, including any government official, government body, private person or company. Although it is sometimes not obvious, keep in mind that the term *government official* includes any government officer, government employee or anyone acting on behalf of a government-owned or -controlled company or a political party or candidate.

**A bribe is anything of value—monetary or otherwise—that is offered, given, solicited, condoned or accepted in order to influence an individual's behavior in a way that is illegal, unethical, improper or corrupt.**

#### Bribery can include indirect methods such as:

- Circumvention of legally required public-bid procedures
- Unusual or improper invoicing processes
- Use of intermediaries to obtain or win business
- Other forms of so-called payment such as lavish gifts or entertainment
- Hiring of relatives of government employees
- Payment of incentives or provision of gifts for government employees

Corruption is the misuse of public or private power for personal or business gain. Our prohibition against engagement in bribery or other corrupt behavior must be respected in all of our business practices, including our approaches toward the offering of any benefits, gifts or entertainment to clients, acquaintances or other third-parties.

PharmaLex also forbids so-called facilitation payments, which are small payments made to individuals with a view to the expediting of routine government actions such as the granting of visas. We expect officers, employees, suppliers, clients and others with whom we conduct business to follow that principle as well.

Anti-corruption laws have global application, and the consequences of their violation are severe, including imprisonment, fines and reputational damage to PharmaLex and the individuals involved.

#### 4.2 Gifts and entertainment

Where permitted by local law, reasonable hospitality expenditures and the giving and receiving of small gifts may be acceptable parts of maintaining a business relationship. However, all hospitality expenditures and gifts should be reasonable, should be for justifiable purposes and should be given in the ordinary course of business. Hospitality expenditures and gifts should never be used to obligate the recipient or be perceived as attempts to influence the recipient to provide PharmaLex with a business advantage.

Confirm with your local Finance staff the appropriate process for providing gifts and entertainment, and ask questions about any limits on value.

Seek guidance from the chief compliance officer or PharmaLex Legal Counsel if you have questions about the propriety of a payment, favor or gift to be offered or received. For more information, refer to the PharmaLex Anti-bribery Guideline.

#### 4.3 Antitrust law and fair competition

Antitrust law protects free, undistorted and effective competition for the benefit of clients, companies and society as a whole.

Antitrust violations can have serious consequences for our company and the employees involved, such as high fines, exclusion from public tenders, claims for damages, damage to reputation and imprisonment.

Anti-competitive agreements include price agreements; market, client and territory allocations; and project agreements with competitors.

#### **We do not talk to competitors about:**

- Prices, price components or other conditions
- Market, client or territory allocations
- Business opportunities or incoming orders
- Capacities, production volumes or quotas
- Corporate strategies or future market behavior (e.g., sales strategies, current or future product developments, investments, or boycotts)
- Offers or tenders
- Conduct during tenders or the submission of bogus offers.

#### 4.4 Trade and export controls

PharmaLex must comply with all applicable national and multi-national sanctions, as well as data export regulations and similar regulations with regard to business with certain foreign countries, entities or individuals. Such sanctions include entering into agreements or helping a client do business with a sanctioned country. We must also comply with any other sanctions applicable where we do business. If in doubt about whether international sanctions or data export regulations apply in a given situation, you should obtain advice from PharmaLex's legal counsel or the chief compliance officer.





## 5 PROTECTING OUR COMPANY

We create trust and protect what makes PharmaLex valuable.

### 5.1 Individual conflicts of interest

Each of us is expected to produce work for our clients and PharmaLex at the highest level, free from any conflicts of interest. We make decisions and act in a manner that is independent and objective, but a conflict of interest can arise when our personal interests interfere with our ability to perform our jobs effectively and without bias.

### 5.2 Vendor conflicts of interest

A potential conflict could also arise if you, your family member or a close friend has personal or financial ties to an actual or potential PharmaLex vendor, client, contractor or other business partner or counterparty. If you become involved in these sorts of interactions, you should not be involved in discussions or negotiations related to your family member or friend's potential business relationship with PharmaLex. Instead, notify your manager immediately, and remove yourself from any involvement.



Outside work arrangements must be approved by Human Resources, and PharmaLex reserves the right to disallow outside work arrangements. Similarly, PharmaLex employees may serve on external corporate boards of directors only with prior approval from their supervisors.



The following questions help us assess whether there is a conflict or the appearance of a conflict.

- Is the decision we make for PharmaLex influenced by personal interests?
- What impression would the situation leave on third-parties such as clients, business partners and investors?
- How would the public react to my business decision?

### 5.3 Four-eyes principle

To properly protect the company's interests and maintain the company's independence for the purposes of internal decision making, we observe the four-eyes principle. Every important decision and approval must therefore be made or given—and legally binding signatures provided by—two authorized PharmaLex employees. Details of the relevant regulations are set out in the Delegation of Authority Policy.

#### Things to remember

- Each of us is responsible for making decisions that are in our clients' and PharmaLex's best interests.
- A situation that could potentially become a conflict should be treated with the same care as an actual conflict.
- Any time your personal interests conflict with PharmaLex's interests, get help to find the best solution.
- Important decisions are subject to the four-eyes principle.

### 5.4 Insider trading

As PharmaLex employees, we may have access to information that investors and the public do not have, such as information about our clients and other companies with which we or our clients do business. Buying or selling stocks based on that information or tipping others to do so violates both the law and our confidentiality obligations to our clients. For that reason, PharmaLex employees and their related parties are prohibited from trading or tipping others to trade on the basis of any material, non-public or inside information.

### 5.5 Money laundering

PharmaLex will not be involved or assist with any form of money laundering. Money laundering is the disguising of the origin of money or other assets from criminal activities and moving the money or assets into the legitimate economy.

PharmaLex strives to maintain business relationships only with reputable clients, partners and companies whose business activities comply with legal requirements and whose financial resources are of legitimate origin.

## 5.6 Financial integrity

As an international company, PharmaLex is committed to accurate and truthful reporting to investors, employees, clients, business partners, the public and all government agencies. We follow all applicable laws, regulations, standards and practices. We ensure our books and records are kept completely, accurately and truthfully. Our books are prepared on time and in accordance with applicable rules, regulations and standards. We provide correct and complete information for financial-reporting purposes.

## 5.7 Books and records

PharmaLex's reputation depends on the integrity of all of our actions and dealings. It is up to each of us to make sure every piece of data we create or maintain in PharmaLex's records—including time and expense documentation and other records—is honest, accurate and complete. We are also firmly committed to the prevention and detection of fraud. Fraud will never be tolerated.

## 5.8 Our expectations of our partners

PharmaLex recognizes that the quality of our vendor and other third-party relationships affects the quality of our client relationships. This means that we expect our vendors to follow high standards of ethical conduct, including avoiding discriminatory or harassing behavior. PharmaLex will create a Supplier Code of Conduct that it expects our vendors to follow.

Business relationships with our clients, our suppliers and other business partners are fundamental to PharmaLex. We maintain business relationships only with reputable partners that comply with the law. We will always select vendors based on their merit and ability to serve PharmaLex's business needs.

### The following principles apply to cooperation with our partners.

- We work closely with our suppliers and business partners.
- We partner with our suppliers and help them improve.
- We constantly analyze our current business relationships and react immediately to emerging risks.
- We work only with suppliers that are prepared to eliminate problems or implement risk reduction measures.
- We conduct appropriate due diligence reviews.
- We comply with export controls and anti-money-laundering laws.
- We assess project risks when deciding whether to bid on a project.

## 6 CONFIDENTIALITY, DATA PROTECTION AND USE OF IT

Our goal is to make our clients' businesses more successful.

### 6.1 Client service and confidentiality

Our business is to help make companies more successful. To accomplish that goal, we apply our accumulated knowledge and experience gained from serving a broad range of clients. We always maintain the highest standards of protection of confidential and competitively sensitive information.

Further, we are always careful not to discuss client work in public spaces, and we protect sensitive information in electronic forms. Clients' confidential information, including specific strategies and case-specific advice, should not be shared beyond the case team. We do not publicly identify a company as a PharmaLex client or disclose any information about our work for a client without that client's consent. We also have an obligation to respect all third-party rights protected by copyright, trade secret, patent or other intellectual property laws.

Ultimately, it is our responsibility to maintain the confidentiality and integrity of the information we receive and to be thoughtful as to how we use, view, communicate and share it.

Seeing to the confidentiality and integrity of confidential client information is the obligation of every PharmaLex employee and contractor. Confidential client information should not be transferred from your computer to unapproved portable media devices. To further protect information assets, you should ensure that all portable devices are encrypted and password protected.

Some clients require our adherence to information security standards different from those we customarily apply, and therefore, we must be sure to understand and fully adhere to those client standards.



For more information, refer to our PharmaLex IT Policy, Information Classification and Handling Policy, and PharmaLex Guideline Confidentiality.

## 6.2 IT policy and privacy

We each have a responsibility to use PharmaLex's network and computer systems ethically and legally. The electronic communication systems and any messages transmitted on them are PharmaLex property and are provided for business purposes. PharmaLex reserves the right to monitor the use of PharmaLex systems, except where prohibited by local law. We must all apply sound judgment when using PharmaLex devices and transmitting information. You should consider your laptop and any other PharmaLex-issued device as business tools.

For more information, refer to the PharmaLex IT Policy and Information Security Policy.

## 6.3 Data protection

We each furnish certain personal information to PharmaLex in the course of our employment—including sensitive personal information—and PharmaLex is committed to securing that information to protect our individual privacy and identity. Some examples of sensitive employee information are benefits and compensation information, contact information, government-issued ID numbers and medical information.

We do not obtain or use our coworkers' or PharmaLex job applicants' personal information without a business need. If your job brings you in contact with personal information of either PharmaLex employees or clients, including customers of our clients, take special care to protect it from loss or theft. Access to and use of such personal information is restricted to the extent necessary and in accordance with the law.

### This is what we attend to.

- We collect and process personal data confidentially and only for legitimate, predetermined purposes and in a transparent manner.
- We process personal data—by means of appropriate technical and organizational measures—only if the data is protected against loss, modification and unauthorized use or disclosure.
- We will immediately inform our company's local data protection organization of possible data protection violations.

For more information, refer to our PharmaLex Guideline Data Protection.

#### 6.4 Records and information management

Our data management policies, practices and standards are designed to help each of us make the right judgments about what we delete, what we retain and why. Documents, including electronic files, that are created or received during the course of client casework should be handled in accordance with our PharmaLex IT Policy and Standard Operating Procedures, which incorporates the following guidelines.

- Records must be managed efficiently and in a confidential manner that is consistent with guidelines on storage and access to information as well as any specific guidelines that may be agreed on with the client.
- With the exception of our deliverables, together with relevant supporting information and documents, which are kept confidentially in our permanent secure archive, records are retained only for such period as necessary to satisfy business requirements, applicable legal requirements and regulatory requirements, after which time they are disposed of. Records may not be disposed of (destroyed or removed) once anyone at PharmaLex receives a subpoena or otherwise has knowledge of pending litigation or regulatory action.
- Records are not the property of employees and upon an employee's departure from PharmaLex, records must be destroyed or turned over to a manager or other person designated by PharmaLex.

#### 6.5 Client contracts

To ensure that we continue to achieve outstanding results for our clients, it is essential that our client engagements be contractually documented and mutually agreed upon at the outset of an engagement. All contracts that do not follow PharmaLex's standard terms must be reviewed and approved by a member of the senior management team and/or legal counsel, following PharmaLex's guidelines. We must involve the senior management team in the case of a proposed deviation from our standard fee, expense or invoicing structure.



## 7 PRESERVING OUR REPUTATION

### 7.1 Media policy

We all have an obligation to protect the reputations of our coworkers, ourselves and our firm. Of course, the best way for us to uphold PharmaLex's stellar reputation is to continue helping our clients achieve outstanding results. Upholding our firm's good name through our words and our actions not only benefits PharmaLex but also demonstrates our commitment to the firm and enhances the benefits our clients receive from our services.

### 7.2 Social media

In an increasingly interconnected world, social media is a powerful tool, and PharmaLex fully supports the use of social media outlets. Our use of those tools, however, does not change our commitment to acting professionally and following our Code, our internal policies and the law. When using social media, you are responsible for adhering to the following guidelines.

- Remember that the Internet is a public place. Once posted, messages and their intent can be easily altered, distorted and forwarded without your knowledge or permission.
- Make clear that your statements are your personal views and do not represent the views of PharmaLex.
- Be aware that anything you say about business issues on social media will be interpreted as PharmaLex's point of view. Therefore, you should ensure that such comments are consistent with PharmaLex's insights and experience; otherwise, refrain from commenting. A good way to ensure consistency is by sharing links to PharmaLex's publications.
- Do not disparage or criticize any company or executive who could be a client now or in the future.
- Respect your coworkers', PharmaLex's and our clients' information by refraining from posting confidential data, copyrighted materials, client names or others' personal information.
- Respect others by refraining from posting discriminatory or harassing comments or images.
- Do not misrepresent yourself or PharmaLex.

To help ensure that the PharmaLex voice stays consistent, contact Marketing.



## 8 SOCIAL RESPONSIBILITY AND SUSTAINABILITY

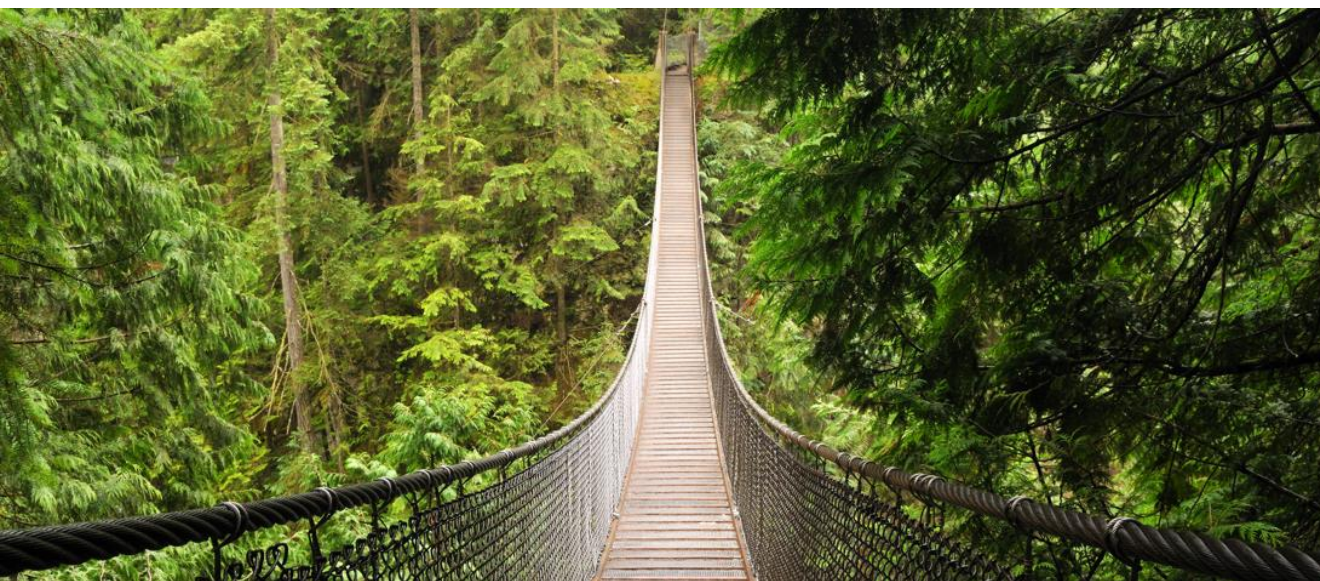
We act socially responsible and achieve sustainable results.

### 8.1 Environment

PharmaLex has made a significant commitment to—and investment in—managing our own business in the most environmentally sustainable way possible. We therefore have introduced our Corporate Social Responsibility Policy.

As a good corporate citizen, PharmaLex complies with all applicable environmental laws, rules and regulations in effect in the locations where we do business. We monitor the environmental impact of our business activities. And through our entrepreneurial network, we champion and implement local sustainability initiatives that reduce our emissions.

All PharmaLex employees are encouraged to submit suggestions and ideas for reducing our environmental impact.



### 8.2 Social impact

At PharmaLex, our objective is to create outstanding results for our clients. PharmaLex aims to exert a transformative social impact by applying our talent in partnership with innovative and effective organizations—with a view to addressing some of the world's most-pressing social issues—as well as by managing our own conduct as a firm. The pressing social issues we focus on from a global standpoint are entitled Accessibility to Medicine, Talent & Knowledge and Healthy & Green.



### 8.3 Our commitment to international agreements and recommendations

PharmaLex strongly supports the United Nations Global Compact.

**The Global Compact's ten principles are binding on the entire company.**

- **Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and
- **Principle 2:** make sure that they are not complicit in human rights abuses.
- **Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- **Principle 4:** the elimination of all forms of forced and compulsory labor;
- **Principle 5:** the effective abolition of child labor; and
- **Principle 6:** the elimination of discrimination in respect of employment and occupation.
- **Principle 7:** Businesses should support a precautionary approach to environmental challenges;
- **Principle 8:** undertake initiatives to promote greater environmental responsibility; and
- **Principle 9:** encourage the development and diffusion of environmentally friendly technologies.
- **Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

We are committed to promoting those ten principles within our sphere of influence. Respect for human rights, respect for fundamental employee rights, environmental protection and the ban on corruption are integral parts of our business.

In line with its commitment under the Global Compact, PharmaLex expects employees and the firm's suppliers and business partners worldwide to comply with the following guidelines.

- International Bill of Human Rights, consisting of:
  - Universal Declaration of Human Rights;
  - International Covenant on Civil and Political Rights; and
  - International Covenant on Economic, Social and Cultural Rights;
- European Convention on Human Rights;
- ILO (International Labour Organization) Tripartite Declaration of Principles on Multinational Enterprises and Social Policy and ILO Declaration on Fundamental Principles and Rights at Work—in particular, on the topics of elimination of child labor, abolition of forced labor, prohibition of discrimination, freedom of association and the right to collective bargaining—and fundamental freedoms;
- OECD Guidelines for Multinational Enterprises;
- Agenda 21 on sustainable development (final document of the fundamental UN Conference on Environment and Development, Rio de Janeiro);
- UN Convention against Corruption; and
- OECD Convention against Bribery of Foreign Public Officials.



#### 8.4 Human rights

Compliance with the human rights laws and regulations is essential. PharmaLex believes human rights constitute a core element of responsible business conduct, and the firm operates in close alignment with the United Nations Global Compact.

## 9 REPORTING PROCEDURES

What to do about signs of possible misconduct?

### 9.1 Importance of reporting

We believe that asking questions and reporting potential problems benefits all of us. Consequently, we expect employees to report possible violations because we take all such reports seriously. Because our Code cannot possibly address each and every situation that might arise, it is up to each of us to use good judgment and common sense in our efforts to solve problems and resolve misunderstandings.

### 9.2 Whom to contact?

- Your manager or another manager you trust
- Chief compliance officer
- Human Resources
- Country head
- Legal counsel
- PharmaLex's eForm submission

### 9.3 How to report?

Information on possible violations of the Business Conduct Guidelines can be provided confidentially and anonymously as needed. PharmaLex will examine all reports and take appropriate measures. PharmaLex does not tolerate retaliation against complainants or whistleblowers. Violations of that nontolerance will be punished as compliance violations.

PharmaLex encourages you to direct questions or concerns to your manager whenever you feel comfortable doing so. We realize, of course, that this may not be possible in every situation. In such cases, you can turn to one of the other resources listed earlier, including via PharmaLex's eForm submission. When making a report, you should be honest and provide as much information as you can in order to facilitate follow-up.

When you report an issue, PharmaLex will investigate the report in a fair, consistent and expeditious manner. In so doing, we strive to maintain confidentiality to the extent possible. Depending on the circumstances, you may receive a follow-up communication upon conclusion of the investigation.

Please check the PharmaLex Compliance Policy for more information on the functioning of the PharmaLex Compliance Management System.

## QUESTIONS

If you have questions about any of the topics in this Code, you can approach any of the following.

- Your manager
- The chief compliance officer
- Key local contacts at Human Resources
- The office head
- Legal counsel



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