

Acting with integrity

Mundipharma's Code of Conduct

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Integrity in all we do

Introduction from our CEO

At Mundipharma, we believe in putting healthcare professionals and the patients they serve at the core of everything we do. An important part of this is our commitment to deliver great results with high integrity.

In our day-to-day work, we all face ethical dilemmas: situations where doing the right thing is not clear or speaking up feels difficult. This Code of Conduct (**the Code**) is designed to help each of us navigate these situations and have confidence we will meet the high ethical and legal standards expected of us.

Delivering results with high integrity protects our valuable reputation and ensures we remain a company that we are proud to be a part of.

The Code applies to everyone at Mundipharma, regardless of seniority. Each of us is required to read and understand the Code, to ask questions where needed, and to support and challenge one another to act with integrity at all times.

If you ever become aware of, or suspect, a breach of the Code, I ask you to speak up. Doing so allows us to make corrections and to continuously improve our processes and controls. We owe this to patients, customers, business partners, the public, and to one another.

If we always act with integrity, we protect our valuable reputation and ensure that Mundipharma remains a company we are proud to be a part of. Wherever you are across the globe and whatever you do, I am counting on you to deliver on this as One Mundipharma.

Marc Princen, CEO



How to use this Code of Conduct

The Code applies to all of us - every employee, officer, contractor, and temporary worker in the global Mundipharma network (referred to collectively as employees). A similar code and principles of integrity will apply to our business partners, who are required to share our commitment to upholding high ethical and legal standards.

It is a condition of your employment or assignment with Mundipharma that you comply with the Code. Any breach of the Code may result in disciplinary actions, up to and including termination, as permitted by local laws.

No Code can cover every situation. Employees are required to follow the specific rules in the Code, as well as the underlying ethical principles, in their day-to-day work decisions and actions. Employees should not assume that a situation is permitted simply because it is not specifically prohibited by the Code. If you have any doubt, please seek further guidance from your manager, your Compliance contact, Human Resources, or Legal.

In conjunction with complying with the Code, we must all:

- Identify risks associated with our work responsibilities;
- Be familiar with our job requirements, including local laws, regulations, industry codes and company policies;
- Consult available resources, including Compliance, Legal, Human Resources or your manager;
- Speak up about questions or concerns; and
- Have the courage to do what is right, even when (and especially when) it is the hard thing to do.

Important note:

If local legislation (including applicable industry codes) is stricter than the Code, you must follow the stricter local rules.



Industry codes

The healthcare industry is regulated by the competent authorities in each country, and is self-regulated by international, regional, and country industry associations, which have developed codes of practice that govern the industry's relationship with healthcare professionals and healthcare organisations, to ensure that all interactions are ethical and professional and to maintain the trust of regulators and patients.

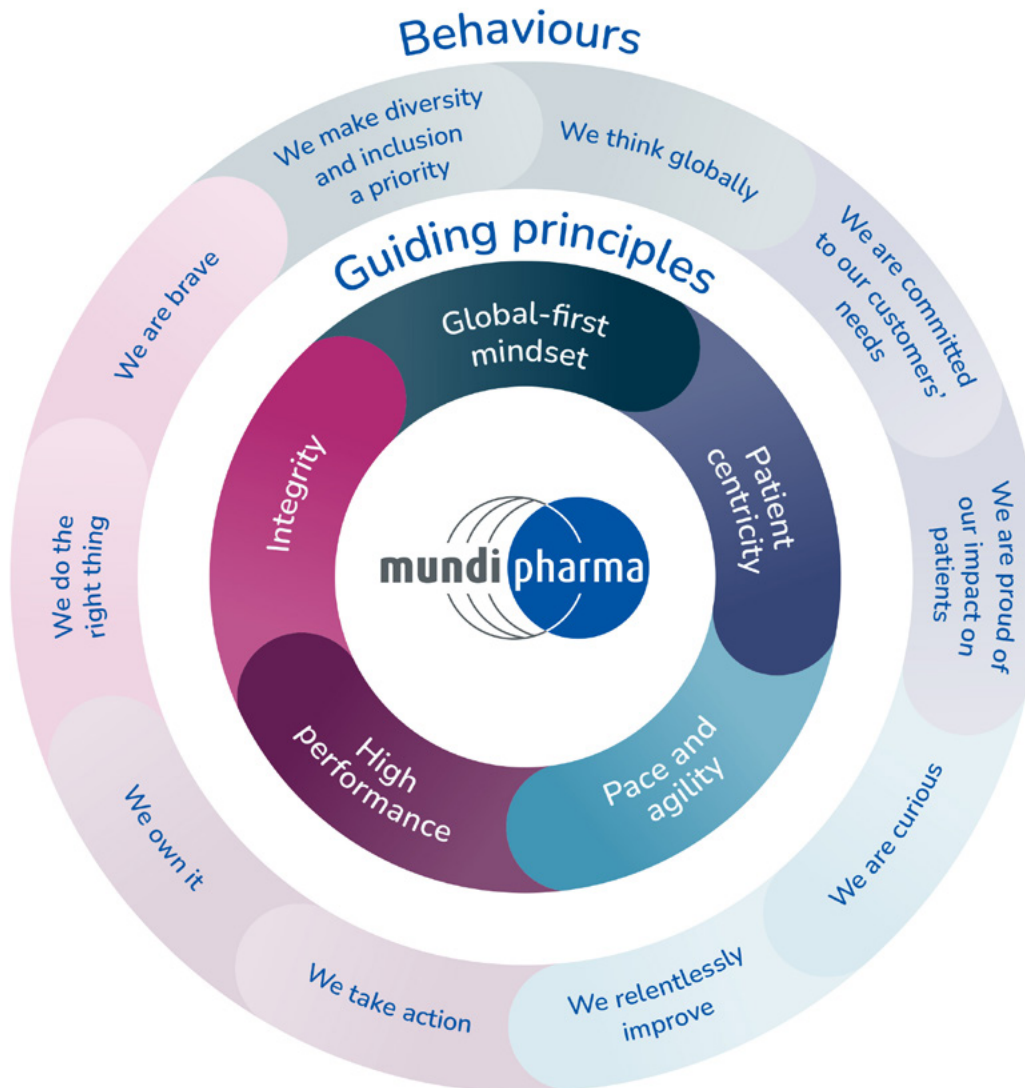
Examples of industry associations include IFPMA (International Federation of Pharmaceutical Manufacturers and Associations), MedTech Europe, Asia Partnership Conference of Pharmaceutical Associations, RDPAC (R&D-based Pharmaceutical Association Committee of China), ASMI Code of Practice in Australia and ABPI (Association of the British Pharmaceutical Industry).

Even where Mundipharma is not a member of a local industry association, we choose to comply with their codes of practice.



Mundipharma guiding principles and behaviours

As we seek to achieve our goals as One Mundipharma, we must always do so in line with our guiding principles and behaviours:



Our guiding principle of integrity

Acting with **integrity** means that we make decisions that uphold the highest ethical and legal standards, and that we:

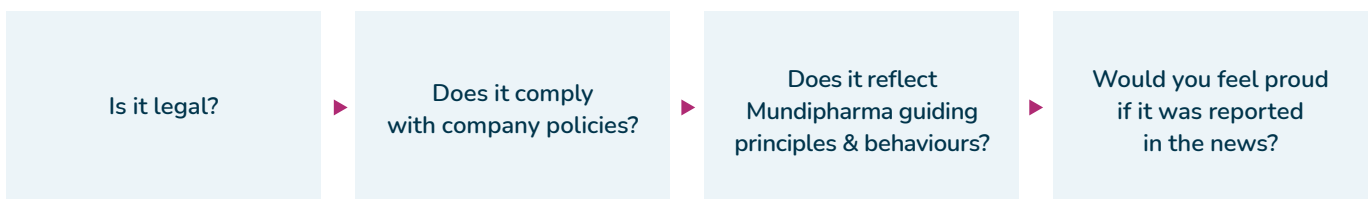
- Are honest in our words and behaviours;
- Respectfully engage with one another, without regard to title, race, colour, gender, sexual orientation, religion, or any other characteristic;
- Consider the impact of our decisions on patients, colleagues, customers, the communities we work in, and the wider public;
- Consider how we would feel if our actions were made public; and
- Have the courage to speak up if something does not feel right.

Making integrity-based decisions

Identifying risk areas and ethical dilemmas is the first step in making integrity-based business decisions.

The second step is to work at pace, but not in haste. In other words, we must take the time to pause and consider possible risks and consequences of our intended actions, and seek help if needed, before proceeding.

Once you have identified a difficult situation or risk, consider the questions below to guide you in your decision-making:



If you answer 'No', or are unsure, then you have an obligation to seek guidance.

Speak up

A critical part of acting with integrity is having the courage to speak up if something does not seem right or is inconsistent with Mundipharma guiding principles and behaviours. By speaking up, we work together as One Mundipharma to prevent or correct mistakes, so that we can protect our reputation and be proud of our company.

To seek help or report a concern, employees are encouraged to talk to a manager, Human Resources, Compliance or Legal. Employees can also contact the **Mundipharma Integrity Line**, which provides an option to report concerns anonymously if preferred.

We are committed to supporting employees who report concerns in good faith and will not tolerate any form of retaliation or victimisation. Such acts will be viewed as breaches of the Code and may lead to disciplinary action up to and including termination of employment (as permitted by local laws).

Our Integrity Line



The **Mundipharma Integrity Line** is a communication platform managed by an external service provider. It allows employees and third parties to confidentially (and, where preferred, anonymously) report concerns. A confidential mechanism for follow-up and response is also provided.

Concerns can be reported in local language on-line or via a toll-free number from anywhere in the world.

See integrityline.mundipharma.com for details.

We are fully committed to promptly and fairly reviewing all concerns that are raised.

Acting with integrity: for patients and healthcare professionals

At Mundipharma, patient safety and wellbeing is at the heart of all we do. Patients rely on our products to improve health and quality of life, and we are committed to strict adherence to all applicable rules and ethical standards regarding research and development, manufacturing, distribution, promotion, and sale of our products.

Reporting adverse events

Any employee that becomes aware of an adverse event, side-effect or other safety information relating to a Mundipharma product is required to report it to the Pharmacovigilance team as soon as possible and no later than within 24 hours of becoming aware. An employee that becomes aware of a product quality defect must likewise report this to Quality Assurance as soon as possible and no later than within 24 hours of becoming aware.

Patients rely on our products to improve health and quality of life, and we are committed to strict adherence to all applicable rules and ethical standards.

Preventing counterfeit products and diversion

We seek to prevent counterfeit products through strict processes including serialisation of individual products within a batch and, where required, serialisation of intermediate containers. Additional specialist security measures are taken in relation to opioid analgesics to avoid loss and diversion in our supply chain.

Healthcare professionals



Healthcare professionals are legitimate (registered or otherwise certified) members of the medical, dental, pharmacy or nursing professions or any other person who during his or her professional activities may prescribe, recommend, purchase, supply, or administer a product.

In Mundipharma policies, the definition of healthcare professionals also includes those who work to support healthcare professionals in their delivery such as hospital administrators.

Interacting with healthcare professionals

The independence of healthcare professionals is of paramount importance to ensure that their clinical decisions are in the best interests of patients. Employee interactions with healthcare professionals must have a legitimate purpose and must not have the object or effect of improperly influencing them to recommend, prescribe, purchase, sell, supply or administer Mundipharma products. Refer to the Global Policy on Interactions with Healthcare Professionals for further information.

Responsible promotion

Promotional activity may only be carried out for approved, on-label indications using company-approved content and by appropriately trained and authorised employees.

Healthcare professionals must form their own science-based opinions about the therapeutic value of our products and what is best for their patients.

All promotional activity must be carried out in an honest, fair, and transparent manner. Our aim is always for healthcare professionals to form their own science-based opinions about the therapeutic value of our products and to decide what is best for their patients.

Opioids

Opioid analgesics are an important option for healthcare professionals to appropriately manage moderate to severe pain. Notwithstanding this medical need, Mundipharma recognises that the use of prescription opioid medications is associated with risks of misuse, abuse, and diversion, and that we have an important role in mitigating these risks. This includes establishing rigorous controls to ensure a secure supply chain, appropriate medical education for healthcare professionals, and responsible sales and marketing practices, as well as regularly assessing these controls to drive effectiveness and continuous improvement.

Included amongst these controls are the requirements that, when promoting or communicating about opioid products, employees must:

- Only provide information that is in line with approved marketing authorisations and national and international pain management guidelines;
- Only use company-approved materials and messaging when discussing the products;
- Provide balanced information about the benefits and risks of using opioids, including the risk of addiction, abuse, and diversion;
- Emphasise the requirement for medical professionals to actively monitor patient use and regularly assess the clinical need for ongoing treatment; and
- Not promote or provide proactive medical education about strong opioids for the treatment of chronic non-cancer pain, even where they are indicated for this purpose.

For more information, please see our charter on the responsible medical use of opioid analgesics in pain management.

Samples

Where permitted by local country guidance, product samples may be provided to healthcare professionals in limited quantities and for a limited time, in order for healthcare professionals to familiarise themselves with our products. Opioid product samples are not permitted.

On-label information

Information, claims, and comparisons included in Mundipharma materials must be accurate, balanced, fair, objective, unambiguous, capable of substantiation and must clearly reflect an up-to-date evaluation of all relevant evidence.

Off-label information may only be provided by Scientific and Medical Affairs and only when responding to an unsolicited scientific inquiry from a healthcare professional, or when presenting the results of a clinical trial or study in a non-promotional setting.

Educational meetings

Mundipharma may host educational meetings where there is a legitimate medical, scientific, or educational need, and where the agenda and schedule are focused on the activities required to achieve the educational outcomes of the meeting.

Mundipharma may also provide funding for third party events organised by well-known, respected organisations with experience organising legitimate scientific meetings, where the educational elements are the predominant focus of the event, as documented in a detailed agenda. Company funding will be limited to booth fees, advertising space or other legitimate marketing opportunities or services, and/or general sponsorship support to reduce the overall costs of the meeting.

Our interactions with healthcare professionals must have a legitimate purpose and we must not improperly influence them in any way.

Mundipharma may support a healthcare professional's attendance at approved meetings through funding of reasonable and necessary registration fees, travel, accommodation, and meals, as required to fully participate in the educational content of the meeting, where they have a legitimate medical interest in the content, and it is new and/or useful to the healthcare professional.

Meals

Infrequent and modest meals may be provided to healthcare professionals who are legitimate participants in an in-person discussion or meeting, where the meal is secondary to the main purpose of that discussion or event and held in a location conducive to a professional discussion.

Gifts

Mundipharma prohibits any gift, favour or other item of value being offered or given to healthcare professionals and other persons with the aim or effect of influencing the decision to prescribe, recommend, purchase, supply or administer Mundipharma products.

It may be appropriate, under certain circumstances as set out in company policies, to provide infrequent and modest promotional aids or items of medical utility to healthcare professionals for the purpose of supporting medical education or enhancing patient care.

Engaging healthcare professionals as service providers

Employees may only engage healthcare professionals to provide a service in response to a legitimate and documented business need and after all required reviews and approvals. Mundipharma will select healthcare professionals based on their skills and expertise as related to the legitimate business need, and independent from commercial considerations.

All engagements must be transparent and documented in a written agreement. Compensation may not exceed fair market value and must only be paid for actual work performed and necessary and reasonable preparation time.

Grants and donations

Mundipharma is proud to provide grants and donations in the form of financial support or company products for activities that further our guiding principle of patient centricity to deliver better, faster, and more impactful solutions, to advance medicine, healthcare, and education, and to benefit the communities in which we operate.

At Mundipharma, all grant and donation decisions are made by a centralised committee to ensure fair and appropriate use of funds and to maintain independence from commercial considerations.

Research

Mundipharma conducts research to advance science and medical understanding. Employees are required to ensure that medical and clinical research has a clear scientific purpose, is in line with applicable laws, regulations and industry codes of practice and is designed to safeguard the safety and well-being of patients.



Acting with integrity: through our business partners

Selecting ethical business partners

We rely on third party business partners, including distributors, vendors, suppliers, and consultants, for a wide range of business-essential activities throughout the world and we value our relationship with them. We respect the work that they do, and we will not ask a third party to do something that violates the law or our ethical standards.

We also recognise that legal or ethical failures on the part of business partners can lead to serious legal, financial, and reputational consequences for Mundipharma. As such, we require business partners to commit to ethical business practices and standards that align with those of Mundipharma and that fully comply with applicable laws, regulations, and industry codes.

Business partners must commit to ethical practices and standards that align with our Code and full comply with laws and industry codes.

To help us select ethical business partners, employees must ensure that all company-required due diligence is completed, relevant policies are complied with, and a legally-approved contract is signed, prior to authorising services or providing products to third parties.

Once a third party is engaged, employees must remain diligent and act promptly upon becoming aware of or suspecting behaviours that are not in line with our standards, including this Code and our policies. We also encourage our business partners to raise questions or concerns to us if they feel that we are not upholding our commitments as set out in the Code.

Due diligence



Due diligence is an advance review of a business partner's commercial operations, ownership, reputation, legal history and other factors that provide insight into a company's commitment to legal and ethical business practices.

Business partners



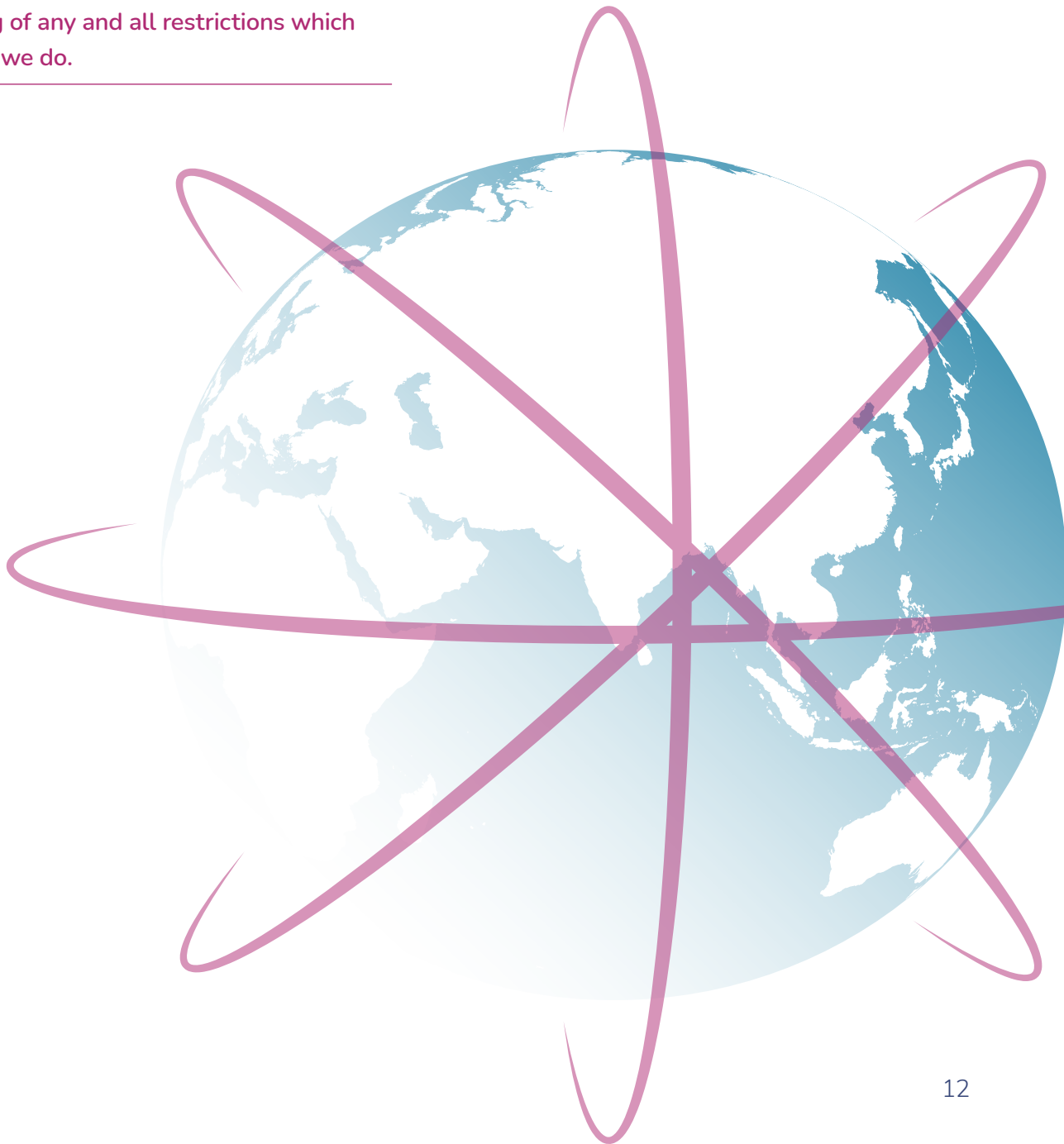
Business partners are external parties we work with to run our business and provide our product safely to patients. They may provide goods (such as raw materials, packaging or laptops) or services (e.g., consultancy, marketing or customs management).

Sanctions, embargoes, and trade controls

Sanctions, embargoes, and trade control laws are part of diplomatic efforts by countries or regional organisations such as the United Nations against states, organisations, or individuals to protect national security interests, international law, and defend against threats to international peace and security. Such laws may govern the import, export, or transfer of certain products and information to specified countries, governments, government officials, entities, and individuals.

Employees are responsible for ensuring a proper understanding of any restrictions applicable to activities carried out for Mundipharma, ensuring any required sanctions screening of third parties and associated individuals, and reporting any known or suspected change in ownership of our business partners that could implicate sanctions laws.

We are each responsible for ensuring a proper understanding of any and all restrictions which apply to what we do.



Acting with integrity: in our world

Bribery and corruption

Mundipharma does not tolerate the giving or receiving of any bribe or improper advantage in any country in which we operate. Facilitation payments are payments made to induce government officials to perform or expedite routine functions that they are otherwise required to perform. They are illegal and prohibited by company policies.

Breaches of anti-corruption laws can be detrimental to the wellbeing of patients and may result in criminal sanctions and reputational damage for both businesses and individuals. Particularly strict requirements apply to government officials, who may include healthcare professionals employed in government institutions, customs officials, regulatory authorities, government inspectors and tax officials, amongst others.

To protect patients, our company and employees from these consequences, employees must:

- Comply with all relevant laws, regulations, and industry codes;
- Not offer, give, or receive a payment or benefit that is intended to, or could be perceived to, improperly influence another, or gain a business advantage;
- Not make facilitation payments, either directly or through a third party, to a government official;
- Comply with company due diligence requirements for third parties and take all other reasonable efforts to ensure that third parties do not engage in bribery or corruption on our behalf or in connection with services they perform for us; and
- Keep accurate records of all transactions, business purpose and approvals obtained.

Any employee that observes or suspects bribery has taken place, is taking place, or may take place, must immediately notify their manager, Compliance, or report it using the [Integrity Line](#).

Bribery and bribes



Bribery is any offer, promise, giving or receiving of a financial or other advantage in connection with the "improper performance" of a position of trust, or for an advantage that should be obtained impartially.

Bribes can take many different forms including cash payments, bank transfers, gifts, donations, discounts, personal favours, or preferential contract terms. They may be given directly to an intended recipient or indirectly e.g., to a family member, favoured charity, or business interest of the intended recipient.

When it comes to our relationships with healthcare professionals, it is essential to understand the range of benefits that may amount to a bribe. Examples of such benefits include travel, gifts, entertainment, extravagant meals, family employment opportunities, unnecessary or excessive consulting engagements and fees, grants or donations and offers of employment.

Data privacy

We respect and protect the personal data of all individuals, including that of our employees, customers, patients, and business partners – and we hold those we do business with to the same high standards.

Employees are required to collect, handle, secure and transfer personal data in accordance with applicable laws, internal policies, data protection principles and our guiding principle of integrity. Any known or suspected personal data breaches are required to be reported immediately to Legal.



Data Protection Principles:

Purpose limitation: Ensuring there is a legitimate business need to use personal data. Using the minimal amount of personal data needed for the specific task. Before using personal data for any new purposes, checking if this is permitted.

Fairness and transparency: Informing individuals how and why we use their personal data, who it is shared with and how it is protected.

Accuracy and quality: Ensuring that records containing personal data are kept accurate and up to date, and we only use good quality data obtained from legitimate sources.

Security, integrity and confidentiality: Ensuring there are suitable safeguards to protect the personal data and individuals' rights. Only sharing personal data with those who need to know, and who are under an obligation of confidentiality.

Storage limitation: Storing personal data securely and for no longer than necessary for the specific task in compliance with record retention policies and any legal notices about document holds.



Sustainability

We are committed to doing our part to protect the world around us. We seek to identify, understand, and manage the effects of our choices and activities on people, society, and the environment. The efforts of every employee are needed as we introduce, develop, and improve sustainable initiatives in our daily work.

Employees are also encouraged to provide suggestions on how we can improve or increase sustainable initiatives through our own work or through the selection of our business partners and to challenge any actions that may have a negative impact.

Human rights

We respect the dignity and human rights of all people and recognise the important role that businesses play in society to prevent and stop human rights abuses such as forced labour, human trafficking, and child labour.

We endorse and are committed to following international human rights standards, including the United Nations Guiding Principles on Business and Human Rights and the Minimum Age Convention, and expect our third party business partners, including distributors, vendors, and suppliers, to do the same.

Employees and third parties are requested to keep vigilant and report any signs of human rights concern in our businesses or with third party business partners.

Competition and antitrust laws

The purpose of competition and antitrust laws is to protect consumers and promote fair and free competition in the best interests of the public. We are committed to competing lawfully and fairly by seeking competitive advantages based on the price, quality and efficacy of our products and service delivery.

Employees are required to uphold this commitment and must not engage in any anti-competitive practices including resale price maintenance, predatory pricing, price fixing, market rigging or other behaviour that violates applicable laws.

When bidding in tenders, we must strictly follow the procedures set out by the tendering entity and uphold ethical and legal standards.

When bidding in tenders, employees must strictly follow the procedures set out by the tendering entity and must uphold ethical and legal standards when gathering or disclosing commercially sensitive information.

Insider trading and securities laws

Severe legal penalties apply when individuals buy or sell securities in a company (e.g., shares, bonds, or options) in breach of insider trading laws. Although Mundipharma is a private company, there may be occasions where employees come into contact with insider information relating to companies with which Mundipharma has or is considering forming a business relationship.

Employees in possession of insider information that has not become public may not buy or sell the securities of any company that the information relates to or disclose the information except as strictly and legitimately required to conduct company business.

Insider information



Insider information is material, non-public information relating to a company that a person meets whether as part of their duties or otherwise. Even where employees obtain such information informally, e.g., through a friend or contact, it is still prohibited to act on it.

Acting with integrity: for our employees

Health and safety

At Mundipharma, we are committed to providing a safe workplace for all employees and visitors.

Whether working in an office, at home, on a manufacturing site, or while travelling or at offsite meetings, employees must prioritise safe and healthy working practices.

Any unsafe conditions, behaviours or safety incidents must be promptly reported through the required channels. Refer to Human Resources or your line manager if in doubt.

Diversity and inclusion

At Mundipharma, we are making diversity and inclusion a priority. We celebrate the wide range of backgrounds, experiences and cultures represented by our employees. We firmly believe that enabling employees to share their different perspectives, thoughts and talents will provide a better work environment and will unlock greater innovation and creativity for patients, healthcare providers and our customers.

Sharing different perspectives, thoughts and talents will unlock greater innovation and creativity.

All employees must do their part to create an inclusive environment and be respectful of one another's unique characteristics.

Discrimination and harassment

Mundipharma is committed to providing equal employment opportunities to employees and applicants. We will not tolerate discrimination based on age, disability, marriage or civil partnership status, pregnancy, race, ethnicity, nationality, colour, religion or belief, gender identity, expression or gender reassignment, sexual orientation, genetic information, medical condition, educational background, or any other characteristics protected by local law or regulation.

Managers and leaders are required to apply employment practices fairly and objectively, including decisions in relation to recruitment, promotion, reward, working conditions and performance.

We also do not tolerate harassment, bullying or other unprofessional behaviour, whether through written communications, visual images (for example, pictures of a sexual nature or embarrassing photographs of colleagues), email, phone, etc.

Employees must not engage in any such behaviour, including but not limited to including spreading rumours, insulting, ridiculing, or demeaning others, misusing power or position, engaging in unwelcome sexual advances, making threats about job security, or intentionally blocking promotion or training opportunities.

Acting with integrity: for our company

Intellectual property and confidential information

Along with our people, intellectual property and confidential information are some of our company's most important assets.

Employees must support Mundipharma in ensuring that intellectual property assets are protected, secured, and defended and must avoid infringing the intellectual property rights of other companies. If an employee becomes aware of any unauthorised use of our intellectual property, this must be reported to Legal.

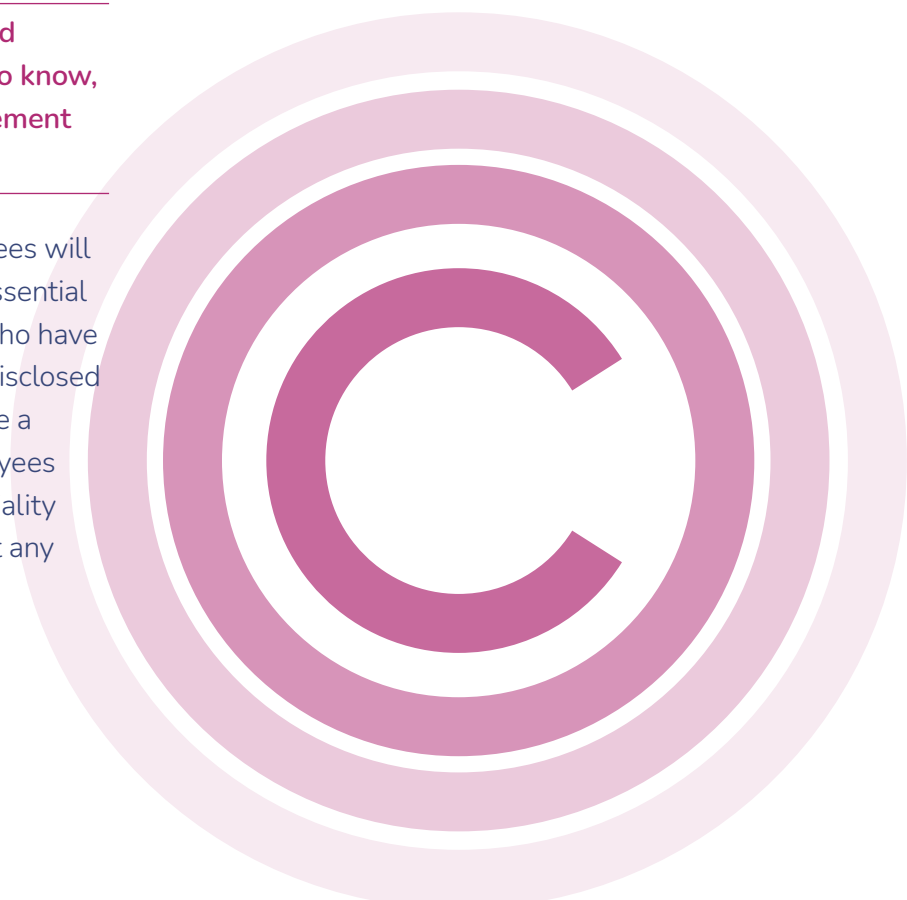
Confidential information must be restricted to those with a legitimate business need to know, disclosed only once a confidentiality agreement is in place.

In the course of employment, many employees will come across confidential information. It is essential that this information is restricted to those who have a legitimate business need to know and is disclosed only where required and, if appropriate, once a confidentiality agreement is in place. Employees must likewise avoid infringing the confidentiality rights of other companies and should report any unauthorised use or disclosure to Legal.

Intellectual property



Intellectual property refers to the ownership of ideas, designs and brands. It includes copyrights, patents, trademarks, design rights and trade secrets.



Conflicts of interest

We all have a responsibility to make decisions in the best interests of Mundipharma and the healthcare professionals and patients we serve. A conflict of interest can arise when an employee's personal, social, financial, or political interests could improperly influence decisions or behaviours to the disadvantage of Mundipharma, our customers or patients. Conflicts can also arise where an employee's position within Mundipharma is used for personal gain.

A conflict of interest arises when an employee's personal, social, financial or political interests could improperly influence decisions.

Even the appearance of a conflict carries the risk of causing reputational damage and legal issues for both our company and the individual employees involved. At Mundipharma, we have strict internal controls to manage this. Employees are required to:

- Disclose and document actual and potential conflicts of interest;
- Work with their manager to resolve any conflicts before taking any further action or decision; and
- Not accept or offer any gifts or benefits that have the intent or effect of compromising an objective decision or action.

Conflicts of interest



Conflicts of interest create the potential for a person to act in a way that puts their personal interests above Mundipharma's best interests or otherwise compromises objective decision-making.

Examples of conflicts of interest can include, amongst other things:

- An employee or an employee's close relative owning or having significant financial interest in a competitor;
- An employee or an employee's close relative owning or having a significant financial interest in a supplier company where the Mundipharma employee can influence the decision to work with that company and/or the business terms with that company;
- An employee's close relative being a senior decision-maker in a government organisation that can influence policies or decisions that impact Mundipharma; and
- An employee having a familial or other close relationship with another employee where they can influence that employee's terms and conditions of employment.

Use of company assets

Company assets include IT equipment (hardware), IT applications (software), cars, machinery, supplies and inventory. These resources are critical to our daily work and should be used carefully, professionally and for their intended purpose.

Employees are required to follow IT, information and other security policies and procedures to ensure our systems and confidential information are safeguarded. Information systems must not be used for any illegal or fraudulent purpose, nor to access or distribute material, which is defamatory, abusive, discriminatory, pornographic, or likely to offend.

Following IT, information and other security policies and procedures helps to ensure our systems and confidential information are safeguarded.

Company resources and assets, including any data and information associated with them, may be monitored or accessed to detect and investigate unauthorised access or use, compliance with the Code or for other legitimate business purposes as permitted by local laws.

Responsible communication

The way that we communicate information has important legal and reputational consequences for our company and only authorised individuals can make comments on behalf of Mundipharma.

Employees must always ensure, when communicating with others, that they do so in line with our values of integrity and doing the right thing and bearing in mind that communication may be forwarded to unintended recipients, made public or used in an investigation.

Social media refers to any website or application that allows individuals to create and share content or participate in social networking. We use social media to raise awareness, engage with our target audiences and increase traffic to our websites.

Employees are required to use social media responsibly and in compliance with applicable laws, regulations, industry codes and company policies.

Financial integrity and fraud

Internal and external stakeholders rely on us to report financial information accurately, completely and in a timely manner. Employees must ensure that data is accurately recorded without alteration and that no business records are ever falsified, misstated, or misleading through the omission of material facts.

Any act of theft or fraud will not be tolerated. Employees are required to have all payments or uses of company funds reviewed and approved as required by company policies, to only use monies granted for the approved purpose and to follow all applicable Finance and Procurement policies.

For more information

For more detailed information, please check the available policies or procedures on Mundiconnect or within your respective organisation.

If you have any question about the Code, please consult the following functions:

Compliance:

- ▶ The Code
- ▶ Interactions with healthcare professionals
- ▶ Third party business partners
- ▶ Bribery and corruption
- ▶ Conflicts of interest

Legal:

- ▶ Data privacy (including to report data breaches)
- ▶ Fair competition
- ▶ Intellectual property & confidential information
- ▶ Insider trading
- ▶ Trade sanctions and export controls

Scientific and Medical Affairs:

- ▶ Approval of promotional materials and messages
- ▶ Medical education
- ▶ Managing unsolicited requests for off-label information
- ▶ Research and development including investigator-instigated trials

Pharmacovigilance:

- ▶ Product safety (including reporting adverse effects)

Quality:

- ▶ Product quality (including reporting quality concerns and other safety information)

Communication:

- ▶ Responsible communication
- ▶ Social media guidance

HR:

- ▶ Health & safety
- ▶ Diversity & inclusion
- ▶ Discrimination & harassment

Finance:

- ▶ Financial integrity
- ▶ Fraud

IT

- ▶ Use of company IT equipment (hardware) and applications (software)
- ▶ Reporting of potential information security breaches

Procurement

- ▶ Third party business partners

Employees are also welcome to use [Mundipharma's Integrity Line](#) for any questions or concerns. It is always available and can be accessed via the [web](#) or by phone, in over 100 languages. See the speak up section of the Code for more information.