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## Our Commitment to Integrity

At Biosidus, we are committed to fulfilling our passion of providing high-quality medicines to our patients in emerging countries while fulfilling the highest ethical standards.

As we expand globally in an ever-changing environment, there might be times when difficult situations arise. Regardless of the challenges we face, we must always act with integrity. Our Code of Conduct details our shared values to guide your business decisions and actions.

All Biosidus employees, officers and directors, and all Business Partners who conduct business on our behalf, including distributors, sales agents, consultants and contractors, are responsible for:

- Understanding and complying with the Code; and
- Preventing and reporting non-compliance with the Code.

If the Company is restricted from doing something, so are its employees and Business Partners.

Violations of the Code will result on appropriate disciplinary actions by the Company, up to and including termination.

## Ask Questions and Seek Assistance

We know that choosing the right path might not be so clear at times. In a world with rapidly changing laws and regulations, you might need help to decide on the best course of action.

Biosidus fosters an open, honest and fair work environment. You are expected to ask for guidance and assistance when you are uncertain about which direction to take.

Based on the circumstances, you may seek guidance from your manager or representatives of the Human Resources, Compliance and Legal Departments.

**?** *Before making a decision, ask yourself these questions.  
If the answer to any of these questions is **NO**, don't do it!*



## Report Your Concerns

It is everyone's responsibility to raise concerns about activities that might violate laws, regulations or our Company's policies and values. We know it takes courage to speak up, but reporting potential violations is essential for safeguarding our business, patients and other stakeholders.

Compliance concerns can be reported at anytime to the Biosidus Ethics Line through the website XXX or phone at XXX. This reporting system is managed by an independent third party and allows for the anonymous submission of reports and inquiries.

Biosidus will not tolerate retaliation against anyone who raises questions and concerns in good faith. Compliance concerns are taken seriously by the Company and they will be screened and considered for further investigation. If asked, you must fully cooperate with internal investigations.



## Reporting Concerns - Frequently Asked Questions:

*Question: Do I need to provide proof of misconduct when reporting a potential violation?*

No, you don't need to provide evidence when submitting a concern. However, you should submit all the information you have on the matter when reporting your concern in order for the company to properly look into the matter.

*Question: Will my identity be kept anonymous after I report my concerns?*

The reporting system allows the investigation team to contact you with questions or requests for additional information, even if you submitted your concerns anonymously. If you choose to provide your identity when you report your concerns, members of the investigation team will take the necessary steps and do their best to prevent the disclosure of your identity. Retaliation against anyone who raises questions and concerns in good faith is strictly prohibited.

*Question: Will I be notified about the disposition of the case?*

You will be informed when the matter is closed. However, you will not be notified about any investigation findings or disciplinary actions.

### Biosidus Ethics Line

*Website:*

*Phone:*



## Complying with Laws and Regulations

We are committed to obeying the laws of all countries in which we conduct business. Biosidus operates in a highly regulated industry, for which regulations are in place to protect our patients, the marketplace, the workplace, the environment and the community. All of our business operations, processes and activities must comply with local and international laws and regulations.

All employees are responsible for knowing and following the regulations applicable to their function. If you need clarification on the laws and regulations related to your work, you can contact your manager or the Legal Department.

If you suspect any violation of laws and regulations, it is your duty to speak up. Report your concern immediately to your manager, the Legal or Compliance Departments, or the Biosidus Ethics Line.

## Zero Tolerance for Bribery and Corruption

As further provided in Biosidus' Anti-Bribery & Anti-Corruption Policy, Biosidus has zero tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever we operate. Corrupt behavior can lead to unfair competition in the marketplace and undermine our business and reputation. Our employees and Business Partners must comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act ("FCPA"), Argentina's anti-corruption laws, and laws of any country in which we do business.

Biosidus employees or Business Partners may never directly or indirectly promise, offer, authorize the payment, pay or give anything of value to any government official, customer, individual or third party to obtain or keep business, or obtain an improper advantage. Suggesting or accepting a bribery or kickback is also prohibited.

Government officials include federal, state and local government employees; political candidates; employees of government-owned national or state owned enterprises; and healthcare providers employed by hospitals run by federal, state and local governments.

Direct and indirect payments made to government officials must be accurately recorded in our books and records. Employees are expected to report all documentation related to interactions with customers, government officials and business partners accurately and timely.

Facilitation payments, which are small payments made to a government officials for expediting administrative processes, are prohibited.

## Fair Competition

Antitrust laws, also called competition laws, protect consumers by promoting open and fair competition in the marketplace. These laws prohibit collusion between companies, including price fixing, market share allocations and manipulation of bids, which are detrimental to fair competition.

Biosidus is committed to competing in the marketplace with fairness and integrity. We will continue to excel in the marketplace through the delivery of our high quality products and services. We respect our competitors and we don't attempt to obtain competitive intelligence through illegitimate sources.

Never discuss topics, share or exchange information with competitors that might be considered a violation of antitrust laws. Sensitive or confidential commercial information, such as sales prices and terms, must never be discussed with competitors under any circumstances, including in professional, social and personal settings.

## International Trade

We are committed to complying with all applicable local and international trade laws that regulate our import and export activities. We must respect the trade sanctions and import/export restrictions imposed by governments where we operate.



## Data Privacy

In the course of business, we gather, use and maintain personal information of patients, employees and others. Personal information is any information specific to an individual, such as name, address, date of birth, national identifier, health condition and insurance coverage, among others.

We must comply with local laws and regulations when treating personal information. Only the minimum information necessary for conducting our work should be obtained, which should never be shared with unauthorized individuals.

## Our Commitment to Quality

The maintenance of international quality standards in processes and products is our greatest commitment to the health of our patients. You must comply with quality laws, regulations, and Company's policies and procedures at all times.

If you are involved in the development, manufacturing, handling, packaging, storing, distribution or monitoring of our products, you are expected to know the applicable quality and safety procedures, and the good manufacturing practices related to our products.

If you see something that could negatively impact the quality of our products, you must report it immediately to the Quality Department.



## Interactions with Health Care Professionals

We build our relationships with health care professionals and organizations based on integrity. We promote our products based on their quality, efficacy and safety of their approved labeling. We don't offer or provide improper payments or benefits to healthcare professionals with the intent of influencing their business decisions or gaining an unfair advantage.

Biosidus may provide support to health care professionals for attendance of medical conferences related to our products and therapies. Sponsorships of health care professionals to attend scientific and medical conferences require prior approval from Biosidus' Compliance Department, and they must never be provided for purposes of rewarding a customer's past purchases or influencing future ones.

Gifts of modest value given in good faith and without the intent to influence clinical and business decisions are allowed only if permitted by the laws and regulations of the country where the healthcare professional is licensed to practice, and with prior approval from Biosidus' Compliance Department.

All sponsorship transactions and gifts must be accurately recorded in the Company's books and records with the appropriate level of transaction detail.

## Diversity and Inclusion

Diversity and inclusion is a key part of our success and we promote a diverse, inclusive and open work environment. We don't discriminate others based on their personal characteristics, including age, color, disability, gender, marital status, origin, race, veteran status, gender identity, and sexual orientation.

Everyone is responsible for fostering a positive work environment where employees feel appreciated based on their contribution and skills. Never exclude or disrespect others based on their unique personal characteristics.

## Harassment

Harassment is contrary to our Company's values and will not be tolerated. Harassment or any type of offensive or aggressive behavior can take different forms, including physical, verbal, sexual, bullying and intimidation.

Your actions and words can make others feel uncomfortable. You are expected to always act professionally and model good behavior through your actions and words. Always maintain a constructive and respectful work environment that promotes productivity and excellence.

Contact your manager, the HR Department or the Biosidus Ethics Line immediately if you experienced or are aware of harassment in the workplace.



## Workplace Safety, Health and Environmental

The safety and health of employees is a top priority. Everyone is responsible for safety in the workplace. You are expected to know and follow the Company's safety, health and environmental policies and guidelines at all times.

Never perform your work while impaired by a lawful prescription medication or over-the-counter drug. The possession, sale, use or distribution of controlled substances on Company premises is prohibited.



## Confidentiality

Every employee is responsible for safeguarding our Company's confidential information and intellectual property, as well as the confidential information that our business partners trust on us. The disclosure of confidential information can have a significant negative impact on our business. Unless Biosidus has publicly released the information, you must consider all Company information confidential.

You should only share confidential information with co-workers on a need to know basis. Always protect sensitive documents and electronic devices, and avoid speaking about sensitive Company information in public places.

If you believe confidential information has been voluntarily or unintentionally disclosed through a hard copy document, email or social media, you must immediately inform your manager or the Legal Department.

## Accurate Books and Records

All transactions must be properly authorized and recorded in Biosidus's corporate books accurately and timely. All transactions must include reasonable details and truthfully represent the facts. False, altered, incomplete, misleading or artificial entries are prohibited.

You must promptly report if you notice an inaccuracy in a company record or a failure in the internal control processes.

## Conflicts of Interest

As an employee of Biosidus, you have a duty to always act on the best interest of the Company. A conflict of interest arises when a personal activity, relationship, investment or interest interferes, or appears to interfere, with your objectivity or ability to fulfill your job responsibilities.

A wide variety of situations can represent a conflict of interest, such as the use of company property for personal benefit or benefit of others; outside employment or activities that can interfere with your job responsibilities; direct line of reporting to a relative or someone you have a personal relationship with; financial interest in a supplier, competitor or customer; gifts and business courtesies; family members or friends who work for a supplier, competitor or customer, to name a few.

You must promptly disclose potential conflicts of interest to the Human Resources or Compliance Departments. Many conflicts can be avoided or addressed if timely disclosed.

