

UAB LEX ANO CORRUPTION PREVENTION POLICY

UAB Lex ano (the **Company**) is a fair, transparent and responsible pharmaceutical company, which enjoys an impeccable reputation and sustainable trust-based relationships with its business partners, suppliers, clients, employees, government institutions and the public. The Company adheres to the highest standards of business ethics, does not tolerate any form of corruption, and supports free and fair trade. The Company's Corruption Prevention Policy (the **Policy**) establishes and defines the general anti-corruption rules of the Company that all of its employees must follow.

CORRUPTION PREVENTION COMMITMENTS

- **Prohibition of bribery.** The Company prohibits bribery, i.e. the taking or giving of any monetary, material or other unlawful reward or benefit to another person in exchange for a desired act or omission, whether lawful or unlawful, and decisions taken or not taken by an employee, manager or government official in the performance of their functions.
- **Zero tolerance for influence peddling.** The Company shall not tolerate any manifestation of influence peddling. Influence peddling is to be understood as unlawful acts performed by an employee of the Company by taking advantage of his or her position, powers, family ties or other influence to induce other employees or the Company's business partners to act or refrain from acting, whether lawfully or unlawfully, in the performance of their functions.
- **Gifts.** With a view to preventing any bias or undue advantage, the Company shall accept, give and offer only those business gifts that do not go beyond the common standards of business relationships and transparency. The Company shall not tolerate any gifts intended to gain an advantage in any of the Company's business activities.
- **Payments to facilitate business transactions.** The Company prohibits making or accepting any payments to government officials to facilitate business transactions by ensuring that standard procedures are carried out or accelerated.
- **Donations and political activities.** The Company shall not tolerate any donations or other benefits that could be interpreted as a way to conceal a bribe. The Company shall refrain from any forms of influence, whether direct or indirect, shall not finance or otherwise support politicians, political parties or political organisations, and shall not participate in the activities of political parties.
- **Conflict of interest.** The Company shall avoid any conflict of interests between the Company, its suppliers and its clients, and shall treat its suppliers and clients fairly. The Company shall take all reasonable measures to identify conflicts of interest and to organise its business in such a way as to avoids conflicts of interest. The Company's employees shall avoid any conflict of interest that could negatively affect the impartial and objective performance of their duties and functions.
- **Confidentiality.** Each employee of the Company shall safeguard the confidential information of the Company and its business partners they have obtained or learned in the course of their employment, and shall not use this information for their own or other persons' benefit.

IMPLEMENTATION OF THE POLICY

- The Company's management shall ensure that all existing and new employees of the Company have an opportunity to familiarise themselves with the Policy and the main principles of corruption prevention as well as comply with the requirements hereof.
- The Company's employees shall make a personal commitment to comply with the provisions of the Policy and be guided by them in their activities.
- Mandatory corruption prevention training for the managers and employees of the Company shall be organised on a regular basis to ensure compliance with the standards of business ethics and the provisions of the Policy.