Behavior in business

We would like to personally ask you to read this Code of Conduct which explains Acino’s position on key compliance issues, aligned with Acino’s mission, vision and values:

- Trust
- Commitment
- Courage
- Empathy

The Code applies to all employees, managers, Group Management, Board of Directors and anyone else acting on behalf of Acino, including distributors and their employees when marketing or promoting Acino products. Managers have a special responsibility to establish a work environment where ethical behavior is encouraged and rewarded. We should all understand that every instruction given or goal set in Acino is performed in the context of this Code.

As a commitment to comply with the law and be true to our values, we have established a Compliance Department, which will implement a broader corporate compliance program. The requisite directives and operational instructions will be provided and you will receive the required training as applicable to your specific function.

We encourage all employees to come forward and speak up when witnessing any form of misconduct. We shall not retaliate against anyone who comes forth in good faith and reports any wrongdoing.

It is our firm belief that Compliance is essential to the continued success of Acino and to build and sustain trust. Thank you for taking your time to familiarize yourselves with our compliance policies and for actively participating in compliance training sessions.

Steffen Saltofte
CEO

Hakan Björklund
Chairman of the Board of Directors

On behalf of Group Management

On behalf of the Board of Directors
This code applies to you

We

Comply with laws of all countries we operate in ................................................................. 8
Do not tolerate bribery or corruption .................................................................................. 8
Observe all standards of good practices ............................................................................. 8
Protect the environment as well as the health and safety of our people and others .......... 9
Compete fairly ..................................................................................................................... 10
Keep our books, records and public disclosures accurate and balanced ......................... 10
Protect Acino’s property and respect valid property of others ............................................. 11
Observe all data protection and privacy rules ..................................................................... 11
Treat ourselves and others fairly ....................................................................................... 12
Avoid conflicts of interest ................................................................................................. 12
Respect freedom of association ......................................................................................... 12
Use communication devices properly ............................................................................... 12
Use social media responsibly ........................................................................................... 12

Reporting violations
This Code of Conduct (“Code”) applies to all directors, officers and employees of Acino Holding AG and of the companies that are part of its Group, as well as employees of joint ventures whose corporate management is provided by the Group. Agents, consultants, contract labour or other, when handling matters or conducting business on our behalf, will also need to abide to the standards of this Code.

It is the personal responsibility of each employee, manager, executive officer, and member of the board of directors to understand and comply with this Code. Managers should ensure that their team members fully understand and comply with these standards. Problems encountered in enforcement as well as suggestions for improvement should be escalated to your manager or to the Head of Compliance.

Any violation may result in disciplinary measures up to and including termination of employment or contract with the Group.
Comply with laws of all countries we operate in
The Acino Group including anyone acting on behalf of Acino shall be aware of and comply with all applicable laws, rules and regulations of the countries in which we carry out activities. In the event of a cross-border activity, Acino will take the strictest of all standards as its own. Acino shall also observe all applicable trade regulations, including trade sanctions.

Do not tolerate bribery or corruption
The Acino Group strictly prohibits bribery in all of its forms. No one acting on behalf of Acino shall provide or promise any person, whether a healthcare professional, public official or private individual, directly or indirectly, any bribe, kickback or other benefit (including money, goods, grants, donations, political contributions, hospitality, travel, accommodation, congress sponsorships, gifts or any other item carrying any value) with the objective of entering into, securing, retaining, receiving or influencing inappropriate advantages. Likewise, we shall not accept any benefit which could potentially jeopardize or unduly influence any of our decisions.

Observe all standards of good practices
Acino shall observe all applicable laws and regulations in relation to its activities such as research & development, manufacture, storage, marketing and distribution activities, including reporting of safety information.
Acino will observe international GxPs, namely, standards of Good-

- Laboratory Practices,
- Clinical Practices,
- Pharmacovigilance Practices,
- Manufacturing Practices,
- Storage Practices,
- Distribution Practices; and
- Promotional Practices.

As an example, all information whether of promotional or non-promotional nature, shall be accurate, fair, balanced, supported by scientific evidence and shall not be false or misleading. All promotion of our products in a given country shall be reviewed and approved by an appropriate cross functional team of commercial and non-commercial functions and will only be released after the requisite approval for marketing has been secured.

Protect the environment as well as the health and safety of our people and others

Acino Group employees shall be required to take all necessary precautions to protect the environment and ensure their own health and the health of others. As an example, the possession, sale or use of illegal drugs or being under the influence of such drugs on company’s premises or activities is strictly prohibited.
Compete fairly

Acino and our employees shall act in accordance with the applicable competition law. In particular, employees shall refrain from having any discourse on or making any arrangements with competitors or other parties which restrict competition, such as the exchange of sensitive information (including production or sales prices, allocation of customers, markets, capacity) or engage in bid rigging. As an example, when realizing that an exchange of sensitive information is occurring amongst competitors in industry meetings, Acino representatives shall immediately leave the room and report the incident to the Chief Legal & Compliance Officer.

We shall refrain from the use of unfair, deceptive, or dishonest business practices. Acino will not impose any unlawful or abusive competition terms and conditions upon any of its distributors, licensees or business partners. Please refer to the Competition Policy for more information.

Keep our books, records and public disclosures accurate and balanced

Acino will accurately record all legally required information. This includes expenses, revenues, research and/or clinical test results, production and quality data and any other legally required information. All financial transactions and payments must be authorized as per the existing delegation of authority charter and subsequently recorded.
Protect Acino’s property and respect valid property of others

We treat company secrets as confidential information. We do not make copies of reports or documents for our own personal use, nor shall we archive them for such purposes. We handle company property with care, whether tangible or intangible, and shall return the same upon termination of our affiliation with Acino.

Acino will not misappropriate or infringe valid intellectual property rights or confidential information of third parties.

Observe all data protection and privacy rules

Confidential personal information in regards to employees or persons outside of Acino is only obtained by lawful means and is safeguarded within Acino’s premises and systems against accidental loss or destruction or unauthorized use, modification or disclosure.

We follow applicable laws on the handling of personal data (personal data is information from which you can identify an individual such as name, birth date, etc.). Personal data is disclosed or transferred to third parties only when legitimate grounds to do so have been established and reasonable and appropriate measures have been taken to ensure the adequate protection of that personal data, in compliance with applicable laws.

In the event of mismanagement or any incidents with files, printed or electronic, which contain personal information, please report any incidents immediately to the Compliance Office.
Treat ourselves and others fairly

Acino believes in highly talented people with diverse backgrounds and inclusive mind-sets. Within the Acino Group we shall treat each other with respect and with zero tolerance against any form of bullying. Any kind of discrimination, regardless whether based on gender, nationality, race, colour of skin, religion, creed, age, ethnic background, civil status, pregnancy, disability, genetic information, gender identity, sexual orientation, disabilities, membership in trade unions, political affiliation or violation of any other protected status, is strictly forbidden and will not be tolerated.

Acino does not compromise on requirements set out in national law or international standards with regard to worker safety and human rights. Acino does not use child or forced labour or other forms of involuntary labour and will refuse to work with suppliers that are found to use such forms of labour.

Avoid conflicts of interest

Employees shall not be permitted to pursue any personal interests, in their own favour or in favour of their family members, friends and partners, which are contrary to those of the Acino Group. Please report to the Compliance department if you wish to have or already have an affiliation with or stake at an Acino competitor, customer or provider of goods or services.

Respect freedom of association

Employees are free to express their political views and engage in political activities outside of working hours without retaliation or discrimination in the workplace. Employees may not, however, use the Company’s name or information to further their personal political interests. Employees are free to join labour associations of their own choosing and to be part of, or included in, collective bargaining.

Use communication devices properly

Acino Group employees shall be permitted to make personal use of the internet and e-mail infrastructure of the Group, provided this does not impair their performance at work, create or amplify a security risk, or block significant resources. Producing, accessing or viewing discriminatory, offensive, pornographic or other prohibited or inappropriate content is strictly forbidden. Subject to, and as permitted by applicable employment and data privacy laws, Acino may monitor use of the communication infrastructure by its users.

Use social media responsibly

Posting “personal” comments in connection with Acino’s business, products, employees, stakeholders and vendors on social media should be avoided.

In all of your interactions, be transparent about your affiliation with Acino and mindful of all Group Policies and Procedures, including this Code of Conduct.

Persons not directly employed by any Acino legal entity shall not utilize the Acino trademark or company name on any social media. Employees of vendors, suppliers, distributors and any other third parties acting on behalf of Acino shall utilize the legal entity or brand name of their employer instead.
Reporting violations

We have a personal responsibility to report suspected violations of this Code of Conduct and shall not be retaliated against for doing so in good faith, even if the report proves to be unfounded. Employees are discouraged from using reporting lines in bad-faith against fellow colleagues, with unfounded claims.

Anyone who would like to report on incidents, ask questions, or make recommendations may contact any of the following:

- Your manager;
- Your Human Resources business partner;
- Another managerial employee at your location;
- Any Compliance personnel;
- Any Legal Department personnel;
- The Compliance Hotline, when launched in your location (for more details please refer to the Whistleblowing Policy).

All questions and incidents shall be routed to the Compliance Office, which will conduct a prompt investigation of any alleged violation and take the appropriate corrective and/or disciplinary actions, if required.