



## **"COMPLIANCE"**

In accordance with the **MEDTECH EUROPE** Code of Ethical Business Practice and the legal and regulatory provisions in force, in particular the Monaco Law's n°1.362, 1.462 and n°1.503 relating to combating money-laundering, terrorist financing and corruption ; Decree n°2013-414 of May 21, 2013 on the transparency of benefits granted by companies producing or marketing products for human health and cosmetic purposes, adopted for the application of Article 2 of the Law n° 2011-2012 of December 29, 2011 on strengthening the health safety of medicinal products and health products ; Law no. 2016-1691 of December 9, 2016 on transparency, on combating corruption and the modernization of economic life; Decree No. 2020-730 of 15 June 2020 on the benefits offered by persons who manufacture or market products or health benefits taken for the purposes of Ordinance No. 2017-49 of January 19, 2017 on benefits offered by persons who manufacture or sell health products or services

Any person acting on behalf of OSTODIS SAM and/or AXIADIS SAM shall not seek to offer, give, authorise, ask for or accept any payment, service, present or compensation from a health professional (customer, supplier, etc.) in order to obtain or retain in an improper way a commercial benefit or to influence an administrative act.

The term compensation shall include, but not be limited to, the following: cash payment, donations, jobs opportunities, hobbies, gifts, subsidies, use of equipment or loans, without deposit agreement or contract, meals or payment of travels or accommodation or undeclared premises, not authorized by the French National Medical Council.

### We undertake:

- not to disclose confidential information;
- to have a correct behaviour towards our colleagues, our hierarchy and, more generally, anyone with whom we are in contact (customers, suppliers, etc.);
- not to commit acts of corruption and to prohibit the granting of compensations in favour of a health professional so as to unduly obtain or retain a commercial benefit or to influence an administrative act;
- to never falsify or hide transactions or agreements;
- to communicate all information regarding our relationships with health professionals;
- to immediately inform OSTODIS SAM and/or AXIADIS SAM of any changes regarding the information provided, including any new third party which would be involved in promoting or presenting a product sold by OSTODIS SAM and/or AXIADIS SAM;
- to keep and provide adequate documentation in order to demonstrate the respect of the present « Compliance » for any payments, services and supplies of valuables in favour of health professionals;
- to conduct an appropriate due diligence of all individuals or entities which may be involved in OSTODIS SAM's and/or AXIADIS SAM's activities and ensure that they will be in conformity with the present « Compliance »;
- not to cooperate with contracting authorities before or during a public tender in such a way that might compromise the impartiality of the procedure.

The present « Compliance » shall be known and applied by all the employees, permanent or occasional, of our companies.

OSTODIS SAM and/or AXIADIS SAM reserve the right to take any necessary action in case of violation of compliance obligations, ethic and infringement of applicable codes of conduct, including the present « Compliance », as well as any other documents relating to standards and policies that may be communicated at a later stage.