# Code of Ethics of Cubic Pharm

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## I. Compliance and Business Integrity

### I.1. Cubic Pharm’s Compliance Program

This Code of Ethics is an ethical guideline for Cubic Pharm team and its affiliates that provides the general guidelines for responsible, ethical and legal business conduct. Cubic Pharm has implemented its Global Compliance Program for Cubic Pharm to provide specific guidance in various fields of operation and high-risk areas. Cubic Pharm’s Program is based on the guidelines and policies to which this Code of Ethics refers.

Responsible judgement is the base for all actions Cubic Pharm makes, as the Code of Ethics, additional handbooks and policies cannot cover all situations. Therefore, we take into consideration factors like:

·         Legality

·         Ethical behavior

·         Representation of Cubic Pharm’s values

·         Management’s opinion

·         Media representation

The bond created by the Compliance Program is a cherished value based on trust that out leaders and team will handle every interaction with responsibility.

### I.2. Increased responsibility from managers

Managers are compliant with Cubic Pharm’s Code of Ethics. Communication is their biggest responsibility, being with team members or affiliates. They need to create an infrastructure which reacts to ethical, compliance and regulatory risks which leads to an environment that encourages an open communication between team members and management.

The main responsibilities of Cubic Pharm’s management are:

* Regarding the reverberations of each action on long-term and form Cubic Pharm’s reputation.
* Enforcing Cubic Pharm values and integrity, by promoting ethics and compliance by example
* Conduct mandatory trainings for the Code of Ethics and compliance manuals
* Being receptive to employee’s concerns and promote an open communication

The Legal and Global Operations Management Department are responsible for implementing and monitoring the Code of Ethics and the Compliance Program.

### I.3. Laws and regulatory requirements

Cubic Pharm and its team comply with the laws and regulations in order to improve the medical products, healthcare services and distance themselves from fraud and influence on medical judgement.

Out Affiliates are subject to the laws and regulations in the country they operate. If they differ from our Code of Ethics and compliance manuals, the stricter law will be applied. All employees are to be familiar with the laws and regulations in the countries our Affiliates activate, in order to create a great legal relationship.

In the case in which a law of regulation may deter from Cubic Pharm’s Code of Ethics and compliance manuals, employees need to consult with the Legal Department and Global Operations Management.

## II. Confidentiality

### II. 1. Confidentiality and data protection

We, at Cubic Pharm, value the data and information provided by our partners, employees and affiliates. The information that is considered confidential, such as trade secrets, is safeguarded both during the contractual relationship and afterwards.

Employees without prior approval of Cubic Pharm shall not disclose to third parties any other facts, data or information related to Cubic Pharm; nor shall employees do anything to allow access to such facts, data or information to any third party.

Cubic Pharm will cooperate with all government’s autochories’ and comply to all regulatory requirements, in which case the Legal Department will determine what information needs to be provided. Furthermore, confidentiality does not apply in the case of public interest data and legally specified data provision, reporting and information obligation regarding data in the public interest.

For the protection of personal data and for the processing of data only under the boundaries of applicable laws, policy and procedures, Cubic Pharm, its business partners and its agents take action under the relevant legislative regulations. The principles established in the relevant laws and regulations as well as in Cubic Pharm’s Ethics Code and compliance manuals shall be upheld by Cubic Pharm, its business partners and its privacy officers, which include personal information concerning health status, medical treatment, disease, race and ethnicity, and religious, political or other philosophical beliefs in particular categories of personal information.

## II. 2. Employees and information

The Cubic Pharm team is required to deal confidentially and protect the company's insider information and to maintain the rules and policies of Cubic Pharm regarding insider dealing, market manipulation and unlawful Cubic Pharm employees. These duties apply not only to employees of the company, but also to all those who are marked in accordance with the regulations in force in Romania and the European Union as "insider person."

The use directly or indirectly of inside information in connection with the purchase and sale of shares or other shares related transactions, for the sake of either the owners or third parties, the share or divulgation of such information with non-committal third parties is strictly prohibited.

## III. Conflict of interest, fraud prevention and anti-corruption

### III. 1. Conflict of interest and fraud prevention

All employees are responsible for avoiding situations that present or create the appearance of a conflict between the employee’s interest and those of Cubic Pharm. No business, industrial or other activities which cause conflict of interest with Cubic Pharm may be pursued by employees during the course of the employees' tenure. Additional and detailed instructions are part of your contract of employment and/or local regulations.

Cubic Pharm’s Global Compliance Program principle of fraud prevention demands employees to act consciously in order to prevent fraud and loss of Cubic Pharm's assets. Knowing conflicts of interest is a cornerstone of our fraud prevention initiative and so we have detected conflicts of interest ourselves.

In order to avoid conflicts of interest, each employee shall take into consideration:

* If a transaction is completed based on an incentive in order to be completed
* Would the transaction harm Cubic Pharm’s image, if published in the media
* Would the transaction impact the way I do my job
* The impact the transaction has on Cubic Pharm’s interest

If any answer is yes, then all employees need to consult with the Legal Department and the Global Operations Department.

### III. 2. Anti-corruption

Cubic Pharm prohibits its employees and other entities acting on its behalf from offering, giving, requesting, accepting or receiving a bribe. Improper payments or any other form of corrupt business behavior by any of Cubic Pharm employees is illegal and may be cause for a penal prosecution.

Business related entertainment of gift exchanges of nominal value is accepted, as long as they are in accordance with the applicable laws and Cubic Pharm’s Code of Ethics and compliance manuals.

## IV. General provisions of employment

### IV. 1.  Equal opportunity

At Cubic Pharm we create equal opportunities for our employees regardless of their race, gender, color, ethnicity, creed, religion, sexual orientation, nationality, marital status, medical condition, genetic information, military service, characteristics protected by applicable law.

Managers are responsible for ensuring the compliance with Cubic Pharms’s Code of Ethics. Also they are responsible for creating open communication corridors for employees to denounce any deviation from the Code of Ethics. Furthermore, Cubic Pharm, expects all employees to refrain form any form of discrimination, harassment and retaliation.

### IV. 2. Human rights, combating human trafficking, child and forced labor

Cubic Pharm strongly condemns practices of human trafficking, child exploitation and forced labor and is committed to prevent these practices in its operations, as well as in its supply chain. Therefore, Cubic Pharm employees respect human rights as defined in the relevant international and local laws and regulations.

### IV. 3. Discrimination, harassment and anti-retaliation

Cubic Pharm denounces any type of harassment, discrimination and retaliation, as it creates and open and liberal workspace for its employees. Any deviation is subject to a disciplinary action which may include the termination of employment, as per applicable law. Managers need to enforce the Code of Ethics in these situations.

### IV. 4.  Political activities

Cubic Pharm are encouraged to partake in political and social policies in a private capacity, not as representatives of the company. Any political activity shall not be developed during working hours and with Cubic Pharm’s equipment. Furthermore, political active employees need to ensure that their activities are legal and don’t violate Cubic Pharm’s Code of Ethics and compliance manuals.

### IV. 5. Substance abuse

Cubic Pharm values the well-being of their employees. In order to avoid hazardous situations in the workspace, Cubic Pharm is committed to create an environment free of substance abuse. Any deviance will be submitted to a disciplinary action.

### IV. 6. Company assets

Cubic Pharm provides its employees with all the equipment and software they need in order to conduct their duties. Employees are expected to safeguard the physical integrity of the assets they are provided for their work and use them appropriately. Any use of equipment should be in compliance with Cubic Pharm’s confidentiality, data protection regulations and ethical norms.

### IV. 7. Books and records

Each Cubic Pharm employee shall manage records and information in accordance with the laws and regulations applicable. Failure to do as expected can result in sanctions according to applicable law.

## V. Research and development and the protection of intellectual rights

Intellectual property of Cubic Pharm is one of its most valuable assets, therefore its competitive edge must be preserved. It includes inventions, knowledge, patents, marks, industrial design rights, regulatory information, copyright rights, trade secrets, domain names, scientific and engineering knowledge, and any other intellectual or industrial rights. The protection, maintenance, protection and implementation of Cubic Pharm’s intellectual property rights is to be supported and safeguarded by each employee.

All intellectual property is protected from authorized access, disclosure and illegitimate use. Unauthorized use, theft or misappropriation of third-party confidential information or intellectual property may result in serious legal consequences such as fines, injunctions or criminal penalties.

## VI. Quality requirements

Cubic Pharm is committed to using advanced technologies in order to improve the quality of the services we provide. The technologies used are in compliance with applicable regulatory requirements and our rigorous standards.

Employees are responsible for communicating through appropriate channels relevant sand safety information, as well as perform their responsibilities in a manner consistent with Cubic Pharm’s quality control.

## VII. General Rules of Providing Product Information

Cubic Pharm is committed to providing patients, consumers, healthcare workers and regulators worldwide with timely and honest product information to keep these stakeholders informed of their products' uses and their effectiveness and safety.

Cubic Pharm makes all efforts to provide proper information on products in a professional and scientific manner and shall refrain from disparaging competition’s products and discrediting them.

All promotional materials and communications shall be accurate, not misleading and compliant with all applicable medical, legal and regulatory standards, including applicable standards addressing substantiation, scientific rigor and fair balance.

## VIII. General Rules of Competition

Cubic Pharm employees are responsible for being aware of antitrust and competition law and their implications in respect of the fact that many nations have antitrust or competition laws although they may vary somewhat from country to country.

Competition legislation has an important impact on Cubic Pharm's activities, including its relations with competitors and business partners (suppliers and distributors). Competition laws are enacted in over 100 countries worldwide, in all Member States of the European Union and by the European Union itself. Within the European Union, an even tighter co-operation between the European Commission as a competitiveness authority and the competition authorities of the Member States was established by the European Competition Network (ECN).

## IX. Compliance with trade controls

Control Pharma and its team is compliant with the global control laws. Any violations can lead to fines and penalties according to the law. Furthermore, we are aware of the regulations providing controlled products in any country.

## X. Protecting Cubic Pharm’s reputation

All employees are expected to be aware of Cubic Pharm’s interests and represent them with dignity. Therefore, no employee shall speak on Cubic Pharm’s behalf without consulting the management team.

### X.1. Social Media

When engaging in social media activities including both internal- and external-facing platforms, employees shall adhere to Cubic Pharm’s policies and Code of Ethics, as well as compliance manuals.

### X. 2. Media and public inquiries

All public communication, including forecasts, press releases, speeches shall be honest, accurate and representative of facts and Cubic Pharm’s values.

## XI. The community

Cubic Pharm focuses its efforts in order to maintain our performances at international standards, whether we are talking about the quality of the medicine market or environmental protection. Therefore, we take an active role in strengthening and improving social and environmental systems, focusing on education.

## XII. Reporting

### XII. 1. Reporting violations

All reports of deviance from Cubic Pharm’s Ethic Code are investigated, as they are a breach in our policies. Cubic Pharm also uses all available means in order to deter from workplace discrimination and aggressions.

### XII. 2. Consequences of violating the Code of Ethics, the Global Compliance Program and its Manuals

Violations of the provisions of the Code of Ethics, the Global Compliance Program and its manuals may entail liability under labour law, civil law or criminal law depending on the circumstances of the case. The legal consequences under labour law depend on all of the circumstances of the case and could include a warning, adverse legal consequences or termination of employment.