

Code of Conduct

Unimedica Pharma AB

Stockholm

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Version 5

General

Unimedica employees shall follow company core values and act responsibly towards colleagues, business associates and society at large; and to take into consideration that when acting outside Unimedica, they are legitimately regarded as Unimedica employees and representatives of the company.

Scope and responsibility

The Unimedica Code of Conduct applies to all Unimedica employees, temporary personnel, consultant, agents or anyone working on behalf of Unimedica. Everyone is required to confirm that they have read and understood the Code of Conduct. Line managers are responsible for making these guidelines known. Violation of this Code of Conduct will not be accepted and may result in formal sanctions being applied.

All partners and distributors working with Unimedica and Unimedica Pharma is also expected to comply with relevant parts of the Code.

This Code of Conduct recognises that compliance with law and relevant regulation when conducting business on behalf of Unimedica is a fundamental duty and an essential part of the responsibility of each employee.

Issues regarding social and sustainable entrepreneurship play an important role in corporate competitiveness, profitability as well as for shareholder value.

To respect human rights, promote fair employment, safe working conditions, environmental responsibility and high ethical business standards, the Code of Conduct is to be applicable globally in all aspects of Unimedica's organization.

Product and safety quality

Patient safety is the highest priority for Unimedica. In our development, manufacture, storage and distribution activities, we will comply with all applicable laws and regulations, including reporting of safety information designed to ensure the safety and quality of pharmaceutical products. We will also adhere to our internal policies and standard operating procedures designed to protect patient safety and to ensure quality of our products.

Relationship with health care professionals

Unimedica is committed to complying with all applicable laws, regulations, and industry codes, including codes established by regional and local industry associations, in interacting with healthcare professionals.

We will not provide, offer, or promise any money, goods, hospitality, gift or any other item of value to induce or reward favourable treatment of our products.

When we obtain consulting services, advisory board services, or any other services from healthcare professionals, we will have a legitimate business need and we will not pay more than an appropriate market value for the services rendered.

Advertisement and promotion

Unimedica is committed to comply with all applicable laws, regulations and industry codes governing promotional activities and advertising and will conduct these activities in an appropriate and ethical manner.

We will follow applicable company procedures designed to ensure that our promotional information and advertisements comply with regulatory requirements and are accurate, balanced, fair, supported by scientific evidence and are not false or misleading.

We will not promote our products for a specific use in a country until the requisite approval for marketing for that use has been given in that country.

Anti-corruption and anti-bribery

Unimedica employees will comply with all applicable laws and regulations prohibiting bribery of government officials as well as all applicable laws and regulations prohibiting bribery of foreign government officials. Unimedica should work against corruption in all its forms, including extortion and bribery.

We will not provide, offer or promise any bribe (including money, goods, hospitality, gifts or any other item of value), directly or indirectly, to government officials or foreign government officials. In addition, we will not provide any payment or benefits to private sector employees to influence them to obtain or retain a business advantage.

We will also ensure that those who act on our behalf, such as our agents and/or consultants, will not engage in corrupt practices.

Unimedica and Unimedica Pharma will only cooperate with partners that adhere to these or similar anti-corruption and anti-bribery guidelines when performing their operational duties.

Procurement

Unimedica employees who work with purchasing will contribute to and work for honesty, reliability and professionalism in our contacts with suppliers and subcontractors.

Purchasers and others participating in the purchasing process and others in contact with suppliers will not inform third parties about competitive prices and other conditions.

All kinds of purchasing activities will comply with all applicable laws, statutes and related regulations in all the markets where we are active. Purchasers and others in the purchasing chain will never participate in contexts where some form of illegal cooperation exists, where competition is limited, such as joint pricing decisions, including production quotas, etc. Unimedica employees will cooperate with all relevant authorities in such matters.

Furthermore, we will comply with all applicable laws and regulations in exporting and importing products, machinery and technology. Employees responsible for exportation and/or importation of goods or technologies will familiarise themselves with these laws and regulations.

Competition and anti-trust

We will comply with all applicable competition and anti-trust laws in all countries where we do business. In particular, we will adhere to the following:

1. We will not exchange information with competitors on pricing, outputs, capacity, customer selection, or exchange any other competitive information, and will not enter into any agreements on those matters (such as price fixing, market allocation, and bid rigging).
2. We will not participate in trade association meetings or other meetings with competitors where we anticipate that such exchange of information or agreements will be requested.
3. We will not impose unlawful resale price restrictions on wholesalers, distributors, licensees, sales agencies or any other party.

Protection of assets and intellectual property

We will protect Unimedica money, property and other assets and will use them solely for the purpose of carrying out our duties to Unimedica and will not misappropriate or embezzle these for ourselves or for any third party.

During and after employment, we will keep confidential and protect all confidential information, including trade secrets and business or technical information about Unimedica and its products, and we will not improperly disclose such information to any third party, nor will we use such information for any purpose other than performance of our duties to Unimedica.

All intellectual property owned, developed, or obtained by Unimedica are vital assets of Unimedica. Therefore, we will carefully safeguard Unimedica's intellectual property and fully cooperate in the establishment, protection, maintenance, and defence of Unimedica's intellectual property rights.

Unimedica respects confidential information and intellectual property of third parties. Therefore, we will not obtain or infringe on such information by illegal or unethical methods either directly or through the use of an agent, nor improperly disclose such information to any third party, nor misappropriate such information. In addition, we will not seek confidential information from other Unimedica employees regarding their former employers.

Personal information

It is Unimedica's policy to respect the privacy of "personal information". Personal information is information that can be used to identify a specific individual by name, date of birth or other description contained in that information. It can include information about employees, patients, clinical study subjects, doctors, employees of customers and others.

We will comply with all applicable laws and regulations regarding protection of personal information in countries where we do business. These laws and regulations vary from country to country. At a minimum, however, we will adhere to the following:

1. We will collect personal information only for legitimate business purposes and by lawful means, and will not disclose or use personal information for purposes other than a legitimate business purpose or as required by law.

2. We will protect personal information by reasonable security safeguards against accidental loss or destruction or unauthorised access, use, modification or disclosure.

Company records and security transactions

1. Company records: we will comply with all applicable laws and regulations and company policies relevant to corporate accounting. We will record all transactions on the company books accurately and properly in accordance with generally accepted accounting principles, and will not make any false or artificial entries. We will maintain internal control systems to ensure that all transactions are accurately and properly recorded.
2. Disclosure: Unimedica is committed to making timely and accurate disclosure of company information to investors including those relevant for MedCap (mother company). We will comply with all applicable laws and regulations and company policies regarding financial disclosures. All employees involved in public disclosures will familiarise themselves with these laws and regulations and company policies.
3. Insider Trading: We will comply with all securities laws and regulations restricting insider trading of securities. If, in performing our duties at Unimedica, we become aware of “material nonpublic information” concerning Unimedica, or any company transacting business with Unimedica, we will not buy or sell securities of Unimedica or that other company, either on our own account or on behalf of Unimedica or any others, nor will we provide that material non-public information to others, until it is publicly disclosed in accordance with applicable laws.

Workplace

1. Relationship with suppliers and customers: We will select suppliers and customers based on fair and objective standards and without favour or preference based on any personal relationship.
2. Hospitality and gifts: We will not accept or solicit any illegal or inappropriate benefits (including money, goods, hospitality, gifts, or any other item of value) from suppliers, customers or others with whom we do business.
3. Financial or employment interests: We will not, without Unimedica’s permission, have any material financial interest in, or engage in the activities of, any competitor or an actual or potential supplier or customer.
4. Personnel issues: We will handle personnel issues impartially and fairly, and will not give any advantage to an employee based on a personal relationship in handling personnel issues such as recruitment, evaluation, transfer, or promotion.
5. Unimedica does not tolerate child labour in any form. No person younger than the statutory minimum age for employment according to the UN Convention on the Rights for the Child shall be employed.
6. Unimedica does not tolerate forced, compulsory or involuntary labour in any form. This includes any work or service that is extracted from someone under the menace of any penalty, and for which that person has not offered him or her voluntarily and against their own will or choice.

7. Unimedica respects diversity, tolerates no discrimination, harassment or abuse. Unimedica will not engage in physical, sexual, psychological, and verbal or any other forms of harassment or abuse, or any other behaviour that could create a hostile work environment. All employees shall be treated according to his or her abilities, qualifications, experience, behaviour, work performance and demonstrated potential in relation to the needs of the job in any employment decision, including, but not limited to, recruitment, promotion, compensation, benefits, training and termination. Unimedica takes appropriate measures to prevent such discrimination and harassment.
8. All employees are free to exercise their legal right to form, join or refrain from joining organisations of their own choice and which represent their interests as employees. Unimedica shall also respect the employees' legal right to collectively bargain, a voluntary process or activity through which employees discuss and negotiate their relations, as applicable under local laws.
9. Employee Health & Safety: Unimedica is committed to providing a healthy and safe work environment for its employees. We will comply with all applicable laws, regulations and company policies regarding occupational health and safety. Consequently, Unimedica will take appropriate action to prevent workplace accidents or illness.

Human rights and environment

Unimedica supports and respects the protection of internationally proclaimed human rights and makes sure that we are not complicit in human rights abuses.

International sourcing and distribution means that Unimedica needs to be aware of potential human rights issues both upstream and downstream in the business.

Unimedica will support a precautionary approach to environmental challenges and undertake initiatives to promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies where possible.

Unimedica is committed to minimising any adverse environmental impact of its products and operations. We will comply with all applicable laws, regulations and company policies concerning environmental protection and accident prevention in all our business activities and conduct them in a way that will conserve natural resources.

Management of suspected breach of the code

We have an obligation to raise and report our concerns about anything we think may be a violation or a potential violation of the Code of Conduct or the local code (if applicable).

We strive to have an atmosphere where every line manager and supporting function shall be ready anytime to openly address and advice on a compliance concern or question raised by an employee. If you have concerns or questions about possible ethical misconduct, or suspect a possible violation of the Code of Conduct should contact any of the following:

Your manager as soon as possible; 1) Our Human Resource Manager; 2) Our Compliance Personnel

Regular review of the Code of Conduct

The Code of Conduct will be regularly reviewed (once annually, or when specific developments so demands), to ensure that it is current and up to date.