

## 1 POLICY STATEMENT

This Code of Conduct sets forth the standards of conduct for Medwork and all persons conducting business on behalf of Medwork, who are expected to act in a lawful, ethical and socially responsible manner.

Although Medwork is a profit organisation, persons conducting business on behalf of Medwork shall always remember that the potential for profit never justifies the disregard of business ethics or applicable laws. Indeed, a single person's misconduct, whatever the justification, can be harmful to Medwork's hard-earned reputation. Even the appearance of impropriety can significantly damage Medwork's image and erode public, client and supplier confidence in the company. Consequently, all persons conducting Medwork business must fully comply with all applicable laws, rules and regulations. Failure to comply with the Code of Conduct and/or the law may result in disciplinary actions.

## 2 RESPONSIBILITIES

### General Manager:

The General Manager, as Medwork's Compliance Manager, is responsible for overseeing the company's compliance policy, including the monitoring and evaluation related to ethical, legal and regulatory obligations. The General Manager ensures the broad application and consistent interpretation of ethical standards throughout the company.

### Department Managers/Process Owners:

Medwork's compliance policy is further supported by Department Managers/Process Owners who are responsible to promote and enforce Medwork's standards for ethical and lawful behaviour, as well as for advising associates on ethical issues encountered as part of their day-to-day functional responsibilities.

### Associates and Approved Suppliers:

All Medwork associates and approved suppliers are responsible for upholding the highest standards when conducting business on behalf of Medwork. They are therefore expected to:

- Conduct Medwork business based on:
  - standards of honesty, loyalty, trustworthiness, fairness, concern for others and accountability
  - good judgment and common sense
- Be sensitive to any situations that can adversely impact Medwork's reputation and the integrity of the services offered by Medwork

## 3 LEGAL AND REGULATORY COMPLIANCE


In every business aspect, Medwork is committed to act in full compliance with:

- National and European legal and regulatory requirements
- Applicable good practice standards (e.g. good clinical practice, good pharmacovigilance practice)

## 4 CONFIDENTIALITY AND DATA PRIVACY

Any Medwork associate may be exposed to confidential and/or proprietary information regarding:

- Medwork
- Medwork's associates
- Medwork's business partners (i.e. clients, suppliers)
- Medwork's competitors
- Patients, clinical study subjects and healthcare professionals

	<b>Effective Date: 06/11/2015</b>
<b>Code of Conduct</b>	<b>Document ID: CoC_Code of Conduct v2.0</b>

Confidential or proprietary information includes any non-public information:

- defined as personal data
- entrusted or accessible to Medwork, within the framework of contractual cooperation (including intellectual property)
- potentially harmful to Medwork or useful to competitors if disclosed (including Medwork's intellectual property)

Confidential or proprietary information may only be used or disclosed in accordance with applicable laws/regulations and relevant written agreements among interested parties (including contractual agreement with third parties and signed subject informed consent).

Uncontrolled and/or unauthorised use or disclosure of any confidential or proprietary information could result in severe complications for Medwork or Medwork's business partners, and could irreversibly harm Medwork's reliability as a business partner.

Therefore, by all reasonable means, Medwork is committed to collect, disclose and use confidential or proprietary information only for legitimate business purposes, by lawful, ethical and respectful means and as required by law.

Medwork's associates must thus safeguard the confidentiality of information entrusted or accessible to them and never disclose it, either directly or indirectly, unless disclosure is appropriately authorised by Medwork or legally mandated. Moreover, they must never use confidential or proprietary information for personal benefit, commercial use or other purposes not directly related to Medwork's business or operations, nor shall they permit such information to enter the public domain through any transmission pathway.

The above mentioned obligations are considered to be binding even after the end of cooperation with Medwork.

## **5 FAIR COOPERATION**


Medwork is committed to:

- promote respectful, lawful and fair cooperation, interaction and communication at all levels and functions within the company, as well as with all business partners and competitors
- provide only honest and truthful information
- honour the contractual commitments with all associates, suppliers and clients

## **6 FAIR COMPETITION**

Medwork is committed to pursue sound growth and profit goals in compliance with applicable antitrust and competition laws and by relying exclusively on the quality of its people and services. Medwork is thus committed to prohibit formal and informal agreements or practices that restrain trade and promote unfair competition, such as:

- Discussions/contacts with competitors regarding pricing, costs or terms or conditions of sale
- Discussions/contacts with suppliers and clients that unfairly restrict trade or exclude competitors from the marketplace
- Agreements with competitors regarding the allocation of markets or clients
- Agreements with the aim to boycott clients or suppliers
- Deception, misrepresentation or abuse of confidential information to obtain unfair advantage over competitors, suppliers or clients
- Receiving, offering or paying bribes, facilitation payments or kickbacks

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## 7 ASSET PROTECTION

For the best interest of both the company and its business partners, Medwork is committed to carefully use its assets and resources, as well as those entrusted by business partners. All associates have the responsibility to:

- Use and maintain assets with care and respect, while guarding against waste and abuse
- Make proper and reasonable use of company resources
- Use assets efficiently and appropriately, for legitimate business purposes only

Medwork considers computing and information resources to be of strategic value and is thus committed to:

- Protect information assets under its control by implementing security controls to protect the confidentiality, integrity and availability of information and information systems
- Use computing and information assets of others only in accordance with software licenses
- Establish specific requirements for the use of computing and information assets (including the internet, electronic mail and other on-line resources, computer hardware and software) and ensure that they are respected

## 8 ACCURATE RECORDS AND REPORTS

Medwork's policy is to strive for accuracy, transparency and fairness in all records and reports. False statements, misleading or artificial entries, material omissions or misrepresentations in financial books, records, or other documents or communications are strictly prohibited. All associates have thus the responsibility to:

- Maintain accurate records and reports, including financial and accounting records that accurately and completely reflect all transactions and assets
- Preserve or destroy business records (physical and electronic) in accordance with Medwork's established record retention policy

## 9 EQUAL OPPORTUNITY


Medwork is committed to provide equal opportunities to all its associates, without regard to their race, national/ethnic origin, religion, ancestry, gender, age, marital status, disability, medical condition, sexual orientation, philosophical views or political affiliation.

All Medwork associates shall be treated with dignity and respect and in accordance with Medwork's policy for maintaining a positive work environment, free of any kind of harassment, whether physical, verbal or psychological.

## 10 HEALTH, SAFETY AND ENVIRONMENT

Medwork is committed to provide a safe, ergonomical and healthy work environment and comply with all regulations regarding the national employment law and EU workplace safety standards. All associates working at Medwork's premises shall be trained to follow all safety procedures, observe posted safety-related signs and immediately report any unsafe conditions or activities.

Medwork is also committed to make careful use of natural resources and to minimise any harmful impact on the natural environment by economising on resources, such as heating, electricity and water as well as by recycling and correctly disposing of the office waste. All associates working at Medwork's premises are required to act with due consideration to the protection of the environment.

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## 11 CONFLICT OF INTEREST

Medwork associates must avoid any actions or relationships that could conflict with, or appear to conflict with, the interests of Medwork. A conflict of interest may potentially arise when, directly or indirectly, an associate takes actions or has personal interests that may make it difficult to perform his/her work for Medwork objectively and effectively, and to make a fair and unbiased judgement regarding the company's interest. Examples of situations related to an actual or potential conflict of interest are the following:

- Being engaged in a business, relationship or activity (including but not limited to consulting or employment relationship, ownership interest, shareholding) with any person or company actually or potentially involved in a transaction with Medwork, or with a client, supplier or competitor of Medwork
- Being in a position to derive a personal benefit, or a benefit for a close friend or relative, by making or influencing decisions related to a Medwork transaction
- Being in a position to influence a decision on employment issues (e.g. hiring, salary or other remuneration, appraisal, promotion) regarding close friends or relatives
- Being engaged in any outside business activity that detracts from the ability to devote appropriate time and attention to the responsibilities with Medwork
- Using Medwork's name/reputation or information acquired through doing Medwork business to gain personal favours
- Accepting/offering payments, gifts, favours, hospitality and/or entertainment beyond the customary level from/to persons or companies with actual or potential business dealings with Medwork
- Receiving improper personal benefits, or being engaged in an agreement for receiving personal benefits, as a result of a Medwork transaction

Any associate actually or potentially involved in a situation related to an actual or potential conflict of interest shall timely bring it to the attention of the General Manager, and fully and truthfully disclose all relevant information.

The General Manager shall evaluate every situation of conflict of interest and either approve it or take appropriate action, so as to resolve or avoid the conflict.

Interests in other companies, including potential competitors and suppliers, that are purely for investment purposes, are not significant to the individual and do not include involvement in the management of the other entity, or where an otherwise questionable relationship is disclosed to the General Manager and any necessary action is taken to ensure there will be no effect on Medwork, are not considered conflicts unless otherwise determined by the General Manager.

If the General Manager becomes aware of a situation of conflict of interest that ought to have been disclosed by an associate, he shall take a serious view of the matter and consider appropriate disciplinary action regarding the associate.

## 12 GIFTS

Medwork as a company and its associates shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits which are intended to obtain business or uncompetitive favours for the conduct of its business. However, Medwork as a company and Medwork's associates may accept and offer nominal gifts of low pecuniary value (up to 50 €), or hospitality (up to 100 €), which are customarily given on special events and/or are of commemorative nature, to foster good cooperation, collegiality and friendly social contacts.

Medwork and its associates shall never accept, offer, give or promise gifts of cash (or cash equivalents) in any business relationship.

In any case, expenditures for gifts and hospitality of any kind (including a clear description) must be accurately reflected in accounting records, expense reports and supporting documentation.

If any associate is uncertain about whether a gift or hospitality is permitted or not, he/she must seek guidance from the Department Managers/Process Owners or the General Manager.

### 13 POLITICAL SPONSORSHIP

Medwork shall not grant financial or other support to political parties or political campaign efforts, as this can be perceived as an attempt to gain an improper business advantage. However, we acknowledge the personal right of every individual to participate in political and democratic processes.

### 14 CHARITABLE CONTRIBUTIONS

Community support and donations are acceptable, be it in-kind services, knowledge, services exchange or direct financial contributions. However, Medwork shall be careful to ensure that charitable contributions and sponsorships are not used as a subterfuge for and do not constitute bribery.

### 15 OPEN DOOR POLICY

The quick and effective resolution of complaints, problems and conflicts is the basis for a harmonious social life at the workplace, as well as for a smooth cooperation with clients and suppliers.

Therefore, the General Manager and the Department Managers/Process Owners have the responsibility to maintain a direct, informal communication line and encourage associates to address themselves directly to their superiors and speak openly about any issue, at any time.

### 16 CONFIDENTIAL DISCLOSURE POLICY

Medwork maintains a confidential disclosure policy that allows associates to report to Medwork's management suspected violations of national or European requirements or of Medwork's policies and procedures. Medwork management will make a good faith inquiry into any reported violation.

Medwork shall not tolerate retaliation against any associate who reports a suspected violation in good faith or who participates in any investigation of a suspected violation. Medwork thus commits to investigate any reported case of retaliation and to take appropriate action to prevent future occurrences.

### 17 NOTIFICATION AND COMPLIANCE

The Code of Conduct shall be communicated to all Medwork associates and approved suppliers, who are expected to adhere to its principles.


Besides, the Code of Conduct shall be posted on Medwork's website, so that it can be easily accessed by clients, suppliers and anyone interested in Medwork's compliance policy.

### 18 DISCIPLINARY ACTION

Intentional or unintentional violation of the Code of Conduct may ensue disciplinary action commensurate with the seriousness of the incident. Associates who negligently or wilfully fail to comply with the Code of Conduct and/or omit to report violations of the Code of Conduct may be subject to disciplinary action, ranging from oral reprimand up to the suspension or termination of the cooperation with Medwork.

### 19 DEFINITIONS

**Associate:** Person appointed by or contractually related with Medwork, who operates under Medwork's quality management system. This includes, without limitation, employees and contracted associates (including in-sourced personnel, freelancers and trainees)

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**Department Manager:** Person having the responsibility of an activity area by managing other people working in this area

**Process Owner:** Person having the responsibility of an activity area while functioning independently, even within a specific department

**Approved Supplier:** Person or company that provides products/services with an impact on Medwork's business activities and provided services, while operating outside Medwork's quality management system.