

MEASURES AND PROCEDURES TO PREVENT FRAUD and CORRUPTION

Anti-fraud policies apply to all employees of Farmaceutica REMEDIA, as well as to third parties representing or acting on behalf of the company Farmaceutica REMEDIA, regardless of identity: subcontractors, agents, intermediaries, as well as business partners.

~~The staff of Farmaceutica REMEDIA shall carry out their activity according to the usage of trade in a normal and fair competitive environment, including by promoting fair and non-deceptive forms of advertising, according to legal competition provisions in force.~~

Any act of corruption, blackmail and embezzlement is prohibited.

In fact, any person working on behalf of or for Farmaceutica REMEDIA shall not give or accept bribe, shall not engage in illegal activities to stimulate business partners or public authorities.

Whenever Farmaceutica REMEDIA works with sub-contracting companies, Farmaceutica REMEDIA shall check that they have good anti-fraud references.

Farmaceutica REMEDIA shall post its anti-fraud policy on the company website, as well as inside company premises.

Anti-fraud policy

1. Farmaceutica REMEDIA does not claim, accept or agree to receive, promise or give bribe. This interdiction applies to: all transactions with partners or external or internal government officials or any employee of any private company. When payment is made directly or through third parties, such as a sales agent, legal entity, customer, supplier.

2. It is prohibited to conceal bribe for commercial or charitable purposes.

3. The HR Department of Farmaceutica REMEDIA organises periodical trainings with all company employees, who are informed that there is NO difference between bribery and facilitation of payment to suppliers, customers or business partners.

4. Actions have been taken to ensure that the agents, suppliers and subcontractors do not offer bribe on behalf of the company.

5. All employees have been warned that the term of bribe includes a benefit given or received in any form, such as (without limitation to):

- cash;
- favours;
- disloyal advantages to family or friends, in terms of professional training opportunities: job relocations, trainings, temporary or permanent jobs;
- offering services, gifts, unjustified protocol expenses.

All company employees have an obligation to inform third parties hired to work on behalf of Farmaceutica REMEDIA of the anti-fraud policy, in particular in the case of partners involved in business development and elaboration of pre-contractual proposals.

Types of practices defined as corruption offences

Accepting/giving bribe (Criminal Code, art. 254 and 255):

Accepting bribe (art. 254 of the Criminal Code) is the act whereby a person claims or receives money or other undue benefits, or accepts the promise of such benefits, or does not reject such promise with a view to perform, not perform or delay the performance of an action related to the duties of his/her job or to act contrary to such duties.

Giving bribe (art. 255 of the Criminal Code) is the same act, but seen the other way round, namely the act of a person promising, offering or giving money or other benefits to an official in order to obtain unlawful interests.

The internal auditor together with the company management must be prepared to use their best efforts to respond in a timely manner to messages coming from the employees of Farmaceutica REMEDIA concerning possible violations of the anti-fraud and anti-corruption policy.

The internal auditor shall mediate between any employee and the Board of Directors or the Audit Committee of Farmaceutica REMEDIA.

Well-defined roles and responsibilities have been established for this purpose:

- The Audit Committee of Farmaceutica REMEDIA shall review the reports received and shall determine further actions.
- The internal auditor shall investigate each type of notification/alert, as well as the source thereof.

At the same time, a clear communication process has been set up, so as to be well established beforehand who is informed and about what, how progress or investigation results are communicated and what types of reports must be handed to the management.

The HR Department of Farmaceutica REMEDIA shall conduct anonymous surveys among the employees, as well as interviews upon leaving of employees.

The internal auditor shall mainly focus on what experience shows to be warning signs, as applicable, in relation to:

- review of third party agreements and related payments,
- analysis of account records for high risk accounts,
- cancellation invoices and void invoices issued to high risk customers,
- payments for gifts, travels and protocol to partners and government officials,
- payments to professional service providers,
- transactions that seem unsubstantiated,
- employee expenses (such as advance payments for travel expenses left unsettled for more than 1 year),
- contributions to charity or political organisations,
- direct payments or reimbursements of expenses to natural or legal persons.

Farmaceutica REMEDIA complies with all legal regulations in force, including those related to sustainable development of the socio-economic environment and social responsibility, such as regulations on prohibition of child labour, prohibition of bribery or granting undue advantages, which are punishable by law.

Should the legislation in force on preventing, discovering and punishing acts of corruption or

these measures be violated by any representative of Farmaceutica REMEDIA, the company can terminate the agency, collaboration/ service provision agreements of those involved, automatically and with immediate effect, without any further formality and no court intervention being required.

Breach of this measure by any employee of Farmaceutica REMEDIA is a serious act of misconduct and shall be punished according to the law in force.

APPROVED

Zoe CHIRITA

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Stamp: Company FARMACEUTICA REMEDIA
S.A., *illegible* Bucharest, Deva

General Manager

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ENDORSED

Corina FLORESCU

Human Resources Manager

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