



**BUSINESS CODE**

**SANTE INTERNATIONAL SA**

## **PERSONAL NOTE FROM THE GENERAL MANAGER**

Our dedication and responsibility to the stakeholders, such as employees, shareholders, customers, traders, users and public authorities, means that we do our best to ensure that our activities are conducted in accordance with the law. This is an obligation that we must fulfill in order to reach our goals. The credibility of our brand image and the sustainability of our company depend on it. This Code of Conduct has the role of an operational instrument that assists each member of our staff, giving them the procedures and measures that are valued by our company and created especially for it, the activities and risks of corruption that we could all face, both collectively and individually. I cannot stress enough the importance of your vigilance in this regard, and I trust in each of you that you will apply all the rules set out in this Code of Conduct, in order to protect the ethical and safe development of our activities.

**General Manager,  
Ciupercă Alexandru Gabriel**

## **THE UTILITY OF THE CODE OF CONDUCT**

The purpose of this Code of Conduct is to help employees, Sante International departments and business partners comply with the anti-corruption principles adopted. It defines corruption and describes its impact on our activities and the initiatives that have been implemented to prevent corruption. This Code of Conduct also provides recommendations to enable all Sante International members to identify situations that could constitute a risk and ways to ensure that anti-corruption rules are respected. Each employee can directly consult the Legal Department of the company for any advice or answers to questions that have not been addressed in this Code of Conduct.

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## **1. SANTE INTERNATIONAL CODE OF CONDUCT**

The success of our company depends to a high extent on our reputation. Responsible and sustainable management is an integral part of our culture and daily activity. In order to be perceived as an integral and trustworthy partner by patients, clients, providers, government agencies and the general public in the health system and to maintain this status, it is important, as a company, to fulfill our legal and ethical responsibilities.

Therefore, Sante International and his partners respects the laws and regulations that apply to its activity. This Code of Conduct lays the groundwork for ensuring compliance with all laws and regulations. Therefore, Sante International and his partners will not pursue business opportunities that are incompatible with these obligations.

As compliance is an integrated management responsibility within Sante International, the purpose of this Code of Conduct is to provide a fundamental framework of compliance standards in Sante International, by establishing basic principles that impose clear rules of behavior for daily activities.

This Code regulates the ethical standards that will be respected in these interactions, having either promotional or non-promotional nature, between the Company and the corresponding medical or administrative personnel.

The Code of Conduct is not intended to replace the guidelines and procedures developed by Sante International, the different regions / divisions and / or departments, adapted to the specific operations of each region, division or department. On the contrary, the Code of Conduct complements and supports these guidelines and procedures and presents general concepts of compliance by providing employees with a general framework of acceptable behavior.

## **2. COMPANY'S CORPORATE PRINCIPLES**

The principles that govern the professional conduct of Sante International employees and partners are as follows:

- a) respecting the supremacy of the Constitution and the law;
- b) professionalism, principle according to which the employees of Sante International have the obligation to fulfill their job attributions with responsibility, efficiency, fairness and conscientiousness;
- c) impartiality and non-discrimination, which obliges all Sante International employees to have an objective, neutral attitude towards any political, economic, religious, or other interest in the exercise of their attributions;
- d) moral integrity;
- e) operational transparency;
- f) confidentiality;
- g) freedom of thought and expression;

- h) objectivity;
- i) professional competence, according to this principle all situations encountered in the activity carried out will be treated on the basis of professional reasoning. In exercising the professional activity, the Company's personnel must show due attention, professional competence and conscientiousness, in accordance with the applicable standards. At the same time, it has the obligation to maintain its professional knowledge and skills at a high level, which will allow the assimilation of the latest knowledge of good practice, legislation and techniques in the field. Employees must also have the experience necessary for their position in order to increase the efficiency and quality of the activity carried out;
- j) honesty and fairness;
- k) non-discrimination, fundamental principle of law provided in art. 16, para. (1) of the Constitution: "Citizens are equal before the law and public authorities, without privileges and discrimination." This principle implies the protection of civil subjective rights without distinction on the basis of race, nationality, ethnicity, language, religion, social category, beliefs, sex or sexual orientation, or belonging to a disadvantaged category;

### **3. COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS**

Sante International carries out all its activities to the ethical standards and in accordance with the applicable laws and regulations. The integrity of Sante International is one of our most important assets, and the Company wants all employees and business partners to protect and defend this integrity. The business conduct of Sante International's employees and partners must be ethical and legal in the relationship with the customer or in the relationship with the partners and suppliers. To promote an ethical culture and commitment to law enforcement, this Code of Conduct and Business Ethics (the "Code") is designed to help employees understand what their responsibilities are for raising business standards to the highest level. .

All the managers, employees and any other contractors, consultants or persons acting on behalf of Sante International are expected to comply with the ethical obligations of Sante International. The following standards of conduct will be applied at all organizational levels. Any employee who violates or does not report the violation of these standards, will be subject to disciplinary action, which can mean dismissal. Actions that constitute criminal behavior may also be the reason for fines or even imprisonment.

### **4. COMPLIANCE WITH THE INTERNAL NORMS AND THE APPLICABLE INTERNAL REGULATION IN THE WORK PLACE**

The Company's internal rules, as well as the Internal Regulations, are mandatory documents for all the Company's employees and provide protection for both the Company and the employees in the workplace.

These documents outline how employees must behave in the workplace, both in relation to the internal staff and in relation with the Company's customers or suppliers.

By establishing a general framework of conduct, any violations and abuses can be easily identified and

sanctioned, and the persons found guilty will be removed from the Sante International team.

## **5. SOCIAL RESPONSIBILITY AND ENVIRONMENTAL RESPONSIBILITY**

Sante International creates an environment of mutual respect, stimulation and teamwork. We value an environment that we share and which offers the opportunity for open communication and continuous improvement. It is created by employees with different training, experience and talents. We respect and appreciate this diversity and believe that this work environment is a real capital for our business.

Each of us is responsible for creating a work environment that rewards high performance and a commitment to professionalism, as well as an atmosphere of trust and respect. Thus, we uphold and respect the principles and standards recognized internationally. The dignity and intimacy of each person must be respected.

Sante International is committed to the protection of nature, as a foundation of life and to the use of natural resources in a responsible manner. It is our mission to continually improve our performance in areas such as environmental protection, occupational medicine and labor protection, product liability and logistics and to comply with legal requirements.

Thus, Sante International respects and promotes compliance by all its employees with the regulations in force in the field of separate waste collection, manufacturing, placing on the market, use, storage, transport, handling, disposal, introduction / removal from the country.

Sante International keeps a strict record in terms of quantities, characteristics and means of providing dangerous substances and preparations, including containers and their packaging, and to provide promptly the information and data required by the competent authorities.

All waste will be disposed of safely for the health of the population and the environment.

## **6. EMPLOYMENT AND STANDARDS OF CONDUCT**

Sante International agrees with the Company's correct and legal guidelines and principles in the field of human resources, regarding human resource planning, recruitment, including job placement, transfers and promotions, compensation and benefits, career development, discipline and other actions in the field of personnel hiring. We strive to ensure that the talents and qualifications of all employees are fully utilized and nurtured.

Therefore, the management principles on which we evaluate our managers are based on these values. Our actions are guided by the knowledge that we can remain competitive only by adapting to the changing global conditions.

Sante International is committed to providing equal opportunities to all employees and will not tolerate

discrimination in employment or work placement based on race, descent, color, religion, gender, nationality, age, marital status, citizenship, physical or mental disability, medical condition, pregnancy, sexual orientation or any other feature protected by law. We want to defend and maintain a quiet, productive, conscientious, safe and non-discriminatory working environment, which appreciates the contributions of all employees. Prohibition of illegal substances and abuse of legal drugs in the workplace is an essential part of our policy on occupational health and safety.

In accordance with the Company's guidelines, all employees must enjoy a work environment free of any form of discrimination, including harassment by executives, managers, colleagues, suppliers, consultants, visitors or clients of Sante International. Violence, abuse and / or aggressive behavior will not be tolerated.

In addition, Sante International prohibits all employees from using, supporting or agreeing to the exploitation of work or the illegal exploitation of child labor.

## **7. SAFETY, HEALTH AND SECUTIRY IN THE WORK PLACE**

As a healthcare company, we are not only interested in the health and safety of our clients, our business partners and their clients, but also the health and safety of our employees.

Sante International aims to provide its employees with a safe, healthy and productive workplace. The Company's guidelines and procedures have been developed in accordance with legal regulations, to protect the employees from potential workplace hazards. Prohibition of illegal substances and the abuse of legal drugs in the workplace is an essential part of our concern for health and safety in the workplace.

Each task or activity must be carried out safely. The Company promotes safety as a way of life within the Company. All employees must acknowledge their obligation to help create a safe workplace and behave in a manner that does not endanger the lives and safety of other colleagues. Each employee must contribute to the safety of his or her co-workers by complying with the relevant laws, regulations and company guidelines.

In order to help ensure a safe and healthy working environment, Sante International prohibits certain activities. Examples include, but are not limited to:

- a) threatening or violent behavior, including intimidation and harassment or even the suggestion of such behavior towards others, including co-workers, patients, customers and suppliers
- b) the deliberate destruction of the Company property or the property of other persons
- c) carrying out any illegal or dangerous activity

The Company's employees must work productively and must behave professionally and appropriately with the Company's workplace and business. Each employee must maintain a mature and responsible attitude and is expected to perform his / her work in a safe, competent and professional manner and to treat clients and other employees with respect.

Sante International employees should be familiar with the safety rules and emergency plans in case of

fire or other disaster in the area where they work.

## **8. INTERRACTION WITH BUSINESS PARTNERS AND THIRD PARTIES. ANTI-BRIBERY. ANTI-CORRUPTION. MONEY LAUNDRY PREVENTION**

Our reputation as a reliable business partner in terms of integrity should not be jeopardized by corruption. Sante International is vehement against bribery and corruption and does not tolerate business that is conducted by wrong means. The remuneration of medical professionals, consultants, agents and brokers must be adequate to the services provided and must be in accordance with the applicable laws, having previously been approved by the management of the Company. Offering or accepting benefits through the appointment or involvement of consultants, agents or brokers for the purpose of illegal business practices is also prohibited.

Practices of any kind (such as cash payments, extended in-kind payments as a form of reward or gratuity for employees) must be agreed upon and such agreements must be properly documented and materialized in a written contract signed by the parties. The documentation and archiving of the implementation of the agreements and the results obtained from the respective activity must also be ensured.

### **8.1. Relations with public authorities**

Special requests for information received from employees of public authorities should be brought to the attention of the General Manager before any information is given and / or transmitted. In general, employees must cooperate when receiving requests for information from public authorities, auditors or other officials.

**Anti-corruption law.** The Company complies with and will continue to comply with all applicable anti-corruption laws and regulations, including but not limited to all anti-terrorism laws and regulations, anti-money laundering and export applicable locally and internationally.

All employees of the Company, as well as persons acting on its behalf (including employees, directors, agents, consultants or subcontractors) are prohibited, directly or indirectly, from offering or receiving bribes, facilitating payments and any other type of payments for the purpose of acquiring or maintaining a commercial advantage.

### **What is bribery and what is forbidden?**

**Taking Bribe** - The legal definition (criminal law): it is an offense that consists in the act of the official (in a broad sense, employed in public institutions) who, directly or indirectly, demands or receives money or other benefits that are not due to him, or accepts the promise of such benefits or does not reject it, for the purpose of fulfilling, not fulfilling or delaying the performance of an act regarding its service duties or for the purpose of performing an act contrary to those duties;

**Giving Bribe** - The legal definition (criminal law): it is an offense that consists in the act of a natural or legal person to promise, to offer, to give, directly or indirectly, money or other benefits to an official in order to fulfill, not fulfill or delay the performance of an act regarding the duties of the service, or for the purpose of doing an act contrary to these duties.

**Influence trafficking** - The legal definition (criminal law): it is the offense by which, a person named promisor, who has influence or is left to believe that he has influence over a public official, demands money or other benefits from a natural or legal person, to solve a problem by convincing the civil servant to do or not to do an act that falls within his duties.

A "**civil servant**" is any official or employee in the public administration or political party, representative of a political party or candidate, or any person acting for or on behalf of such a person, in any country. A "civil servant" includes any person who: (a) holds a legislative, regulatory, supervisory or judicial function; (b) is an administrator, officer, employee or otherwise acting for an entity owned or controlled by a government or an entity with governmental functions; or (c) is an official or employee of an international public organization.

Sante International prohibits bribery in all forms and in all its business and relationships. Sante International is committed to operating in accordance with the highest ethical standards and in accordance with all applicable laws, and prefers to lose a business rather than illegally obtain it. Based on these fundamental principles and legal obligations, Sante International does not tolerate any form of bribe and prohibits every employee and collaborating partner from giving or receiving any kind of bribe.

## **8.2. Relations with business partners, clients, healthcare professionals**

Sante International appreciates professional relationships and will strive to maintain an environment of mutual respect and professional cooperation. Professionalism and due respect must be shown at any time and in any relationship with clients and other business partners, including physicians, medical directors and employees of the healthcare units.

Clients and business partners should not be offered, promised or given, directly or indirectly, benefits that compromise or appear to compromise the ability to make correct and objective business decisions.

Subject to compliance with the relevant requirements of the legislation in the field and of this Code, the Company may sponsor / finance various events in order to support the development and professional knowledge of the medical personnel.

These events are subject to the following basic principles:

- 1) the main purpose of any event must be of a scientific or educational nature (case in which the presence of one or more speakers is required) and must support the promotion of the business-to-business or the Company's brand; no interference should be manifested in the independence

- of medical professionals;
- 2) the hospitality and entertainment associated with the meeting must be secondary to the purpose of the event, must be appropriate, meaning that it must not damage the image of the Company and must not be disproportionate to what the medical professionals want and can pay for themselves; thus, the professional / scientific content of an event should cover the majority of the duration of the event as compared to the hospitality and entertainment time;
  - 3) the hospitality granted to the medical staff will be at a reasonable level and strictly limited to the duration of the event;
  - 4) the hospitality granted in connection with the events will be limited to travel, meals, medical insurance during the trip (if applicable), accommodation and registration fees; it must not be extended to the spouse or other accompanying person unless that person is a member of the appropriate medical or administrative staff and qualifies as a proper delegate or participant on his / her own.
  - 5) the venue should serve the main purpose of the event, therefore places of an exclusively touristic, sports or entertainment nature will be avoided;
  - 6) events outside Romania should not be organized or financed unless they are appropriate and necessary for logistical or security reasons (ex: visit to a manufacturing plant / research center located abroad; most of the participating professionals are from different countries, etc.);
  - 7) five-star hotels will not be used for accommodation or as a venue.

The above principles will also apply to events initiated by either the Company or those organized in Romania by professional associations and sponsored by the Company.

In accordance with industrial practice, the maximum thresholds to be met for event-related hospitality have been established and distributed internally.

In any case, the Company will conclude a written contract with the person receiving the sponsorship, in which the requirements mentioned above must be included.

### **Occasional gifts**

The company can also give clients, partners and professionals in the medical field gifts on certain special occasions such as: birthdays, name days, legal holidays (Christmas, Easter, etc.), of up to 50 EURO VAT included. This value represents the value of the product prior to printing with the Company logo.

At the same time, the Company allows its employees to receive such occasional gifts from customers, partners, etc., under the conditions described above.

### **8.3. Money laundry prevention**

Money laundering can occur when an action is taken in order to mask the true source of the money or

assets that are related to criminal activities. The company takes all appropriate measures to prevent the use of its operations as a vehicle for money laundering and complies with the obligations established by applicable national and international laws.

## **9. DONATIONS AND SPONSORSHIPS**

Sponsorship activities and donations must adhere to the following key principles:

- a) Donations that may harm the reputation of Sante International or which are illegal according to the law should not be granted to political organizations, parties, individual politicians or organizations;
- b) Donation and / or sponsorship activities should not have the purpose of inappropriately influencing the purchase of products and services from Sante International;
- c) Donation and / or sponsorship activities must not violate any applicable laws or regulations;
- d) Donation and / or sponsorship activities should not be carried out in individual or private bank accounts and should be performed on a voluntary basis and without any expectation of mutual reward;
- e) All donations must comply with the official local rules regarding the approval, the appropriate documentation and the deduction of taxes;
- f) All charitable donations will be made directly to the institution and must be used for its benefit.

The medical staff can also receive as sponsorship medical / scientific papers and other educational materials with a reasonable value . If the real educational purpose is justified, the payment of membership fees in the Romanian or international professional associations and the fees for accessing specialized publications may also be covered.

The company can transparently sponsor medical staff for the preparation and editing of medical and professional papers. The respective papers will mention the sponsorship thus granted.

At the same time, the Company may grant sponsorships, donations, rent free of charge (commodities) or other allowances provided by the Company to healthcare / medical institutions or non-governmental organizations affiliated with these institutions or who have medical personnel in their management bodies. The provision of such benefits is allowed if:

- a) the purpose is to support the development of the health system or the improvement of the medical or technical infrastructure for the benefit of the patients;
- b) the healthcare / medical institutions or the relevant entities have previously submitted a specific request for financial support;
- c) a written contract is executed between the donor / sponsor / allocator and the beneficiary of the support in which all relevant terms and conditions will be clearly regulated.

## **10. COMPETITION**

Sante International competes actively in the market, respecting the laws and regulations that apply to our

business in the country in which we operate. Sante International employees should not attempt to reduce or restrict competition through inappropriate measures in carrying out any commercial activity.

No employee or business partner must enter into unlawful agreements with business partners, which could have as their object or effect the restriction of competition.

No one should take advantage of others illegally, through manipulation, concealment, abuse of inside information, distortion of essential facts or dishonest business practices.

Not only written or verbal agreements, which threaten or even restrict competition, are prohibited, but also any behavior with the same purpose. Sante International employees should not treat customers or suppliers in an illegal or unethical manner. Bids and proposals will be evaluated objectively, in terms of price and performance.

Sante International believes in fair and open competition, and calls for adherence to all applicable anti-trust or competition laws around the world.

## **11. CONFLICTS OF INTERESTS**

We promote the highest professional and ethical standards for ourselves and those we associate with. Private interests - which include personal, social, financial and political interests - and Sante International's interests must be kept strictly separate. Therefore, all employees and partners should avoid situations that may lead to a conflict between personal interests and those of Sante International. In a conflictual situation, Sante International's interests should not be compromised.

A conflict of interest may exist if the needs of other activities, including non-service activities, distract you from performing your tasks in a professional manner or cause you to use the Company's time or resources for purposes that are not in the Company's interest.

Permission for other work commitments - in addition to that with Sante International - must be managed in accordance with the individual employment contract. Other work commitments that may conflict with the Company's interests require the explicit permission of the General Manager of Sante International. This applies in particular to any position in a company with which Sante International has business relations. It also applies to freelance activities.

Integrity and loyalty are also indispensable for the private activities of the employees, which can have an effect on Sante International. The private involvement in associations, political parties or other social, political or cultural institutions should not, however, prejudice the fulfillment of the responsibilities of each employee towards Sante International. Employees should not make any reference to their position in Sante International when expressing their opinions in public.

## **12. CONFIDENTIALITY**

Employees and business partners must treat the Company and market information confidentially and must not use such information to create an economic advantage for themselves or others.

The Company's confidential information constitutes an asset that include facts, data and production

processes that are not public. The Company's confidential information and market information must be carefully managed, as they may have economic value for our competitors or for other persons interested in commercial relations with Sante International, as well as for the media or the financial community.

Confidential information includes all information that is not public (either in written or verbal form), including information that may be of use to competitors or may be harmful to the Company or its customers if disclosed and includes data on: strategy, corporate strategy, planned acquisitions, sales of companies / divisions and production lines / products, business plans, strategic plans, extraordinary situations (eg. litigation), marketing and distribution, sales and profits, marketing and commercial strategies, customer list and related information, market segments, competitors analysis, product prices, rebate system, customer / supplier contracts, research and development, current projects, planned projects, study design and results, status and projects regarding marketing authorization, inventions, status and patent duration, production and technology, manufacturing methods and processes, production plans, schemes of factories, constructions, compositions of manufactured / distributed products, technological development projects, inventions, information on the supply of materials, contracts and lists with suppliers, quality data, standard operating procedures, human resources, personnel data, organizational charts, including names, finances and accounting, budgets and forecasts, costs and expenses, profits and profit margin, price calculation, balance sheet information, financial forecasts.

The confidential information of the Company, necessary for the employees and partners to carry out the activity, should be used only for the purpose related to the service activity and should be transmitted only internal and only to those employees who need this information for their activity. Employees working with confidential information are required to take all necessary steps to protect this information from any inappropriate disclosure. They have the responsibility to ensure that confidential information is protected against theft, destruction, unauthorized disclosure or misuse.

Company confidential information should not be disclosed by employees who no longer work for Sante International or any other affiliated company. In addition, Company confidential information should not be disclosed to third parties - neither competitors nor friends or family members.

In addition, all employees are required to perform their activity in accordance with the confidentiality commitment, defined in their employment contract with the Company.

Such confidential information may be disclosed only at the request of a public authority or institution, court or under a regulation or legal provision. In any such situation, the employees must inform the management of the Company about the request for the disclosure of the respective confidential information.

The obligation set out above also applies to the confidential information of third parties, contractual partners or clients of Sante International, information that employees become aware of in fulfilling their duties.

## **Intellectual property**

Employees and business partners are required to respect and protect intellectual property rights with respect to trademarks, domain names, trade names, patents, inventions and any other creations that may be protected under applicable law pertaining to Sante International.

With respect to the intellectual property rights of third parties, Sante International requires that all software, data, images, or any other materials owned by third parties installed on equipment, such as laptops and mobile devices, be properly licensed.

We are aware of the value of the Company's know-how and attach great importance to its protection. We respect the intellectual property of competitors, business partners and other third parties.

## **13. MANAGEMENT OF RECORDS REGARDING COMPANY INFORMATION**

### **A. Documents and reports for legal authorities**

The designated Sante International employees and business partners must accurately prepare all the documents and reports required by the public institutions at local and central level, on time and in accordance with the applicable Company laws, regulations and guidelines.

Designated employees are responsible for ensuring the accuracy of any information provided to be included in a report that will be signed and certified by a Company manager and for reporting any issues and questions before the report is completed, signed and submitted.

Medical and commercial records must not contain false or misleading information and should never be altered or destroyed in order to conceal an error or omission or to receive a payment to which Sante International is not entitled to.

False statements contained in a document or report sent to the legal authorities may result in individual civil and / or criminal liability and / or of Sante International.

All Sante International employees and business partners must know in detail the rules regarding registrations for which they are responsible as part of their activity and must follow all steps necessary to ensure that such registrations are created, maintained and protected in accordance with the applicable laws and Company regulations and guides. Copies of the documents and other materials used in the preparation of an official document or report must be kept in accordance with the applicable laws and Company regulations and guidelines.

### **B. Accounting and financial reports**

All documents, accounting records and entry data must be complete, prepared accurately, correctly, timely and in accordance with the legal and contractual requirements.

Compliance with the necessary separation of responsibilities and implementation of appropriate business and control processes must be ensured. The accounting and financial reporting must comply with the legal provisions in force.

The integrity of Sante International registrations and public data depends on the accuracy, completeness and validity of the information that represents the entry elements in Sante International registries and registrations. Employees are responsible for the accuracy of this information. The records and accounting records must reflect correctly and objectively, within reasonable limits of detail, the assets, liabilities, income and expenses of Sante International, as well as transactions and changes in the level of assets and liabilities.

#### **14. COMPLIANCE MONITORING AND AUDITING**

The adequacy of the local trainings and the implementation of the measures is verified by internal audits.

Audits verify that the elements and rules of the Code of Conduct and related documents are implemented and complied with and that management controls are sufficient to ensure compliance with existing compliance rules, to measure the effectiveness of our compliance program and to verify that aspects of the Code of Conduct and documents related are implemented and respected.

Audits are planned annually and are scheduled using a risk-based approach. The audit plans, including the respective purpose, are issued by the Management Board of Sante International. In addition, compliance audits can be scheduled by the General Manager at any time, especially after receiving information about a compliance breach.

It is expected that you will cooperate with any authorized Sante International auditor, who performs an investigation in your area of activity. On an annual basis, the Managing Directors will be required to certify that they have conducted compliance training for all employees in their area of responsibility.

#### **15. INFORMATION ON OFFENCES AND REPORTING PROCEDURES**

Sante International supports and encourages an open dialogue on compliance issues between employees and managers. Employees are responsible for prompt reporting of any misconduct, illegal activities, fraud or other violations of Sante International law or guidelines. In doing so, you allow the Company to investigate and take prompt corrective actions, as well as maintain its reputation on the market as a reliable partner in terms of integrity.

##### **Reporting procedures**

Sante International has established a procedure whereby suspicious misconduct can be reported to the senior manager or to a manager of the Company, if the direct manager is unable to resolve the issue or

you feel it is off-putting to talk to your direct manager about the issue.

However, anyone who uses this Code of Conduct or any compliance program to spread lies, threaten others, harm another person's reputation or for any other inappropriate use, will be subject to disciplinary action that may lead to the termination of the employment contract.

In order to conduct an effective compliance investigation, if a suspected breach is reported, Sante International encourages you to cooperate with the Company, providing your name and respective information about inappropriate behavior, along with all possible details.

**GENERAL MANAGER**

**CIUPERCĂ ALEXANDRU GABRIEL**

