



# CODE OF BUSINESS CONDUCT

2024



## WHO IS THIS FOR?

We are committed to maintaining the highest standards of business conduct and ethics.

The standards and values enumerated in the Code of Business Conduct (the “Code”) reflect the business practices and principles that support this commitment and express the culture of our company. This Code is binding on and applies to employees of all business units, departments and other divisions throughout Pharmascience Inc. and its affiliates (“Pharmascience”), and members of the Board of Directors and replaces the previous Code of Ethics.



# TABLE OF CONTENTS



## OUR COMMITMENT TO INTEGRITY

Compliance with Laws .....	5
Antitrust and Fair Competition .....	6
Anti-corruption / Anti-bribery .....	7
Trade Compliance (Export / Import Control) .....	8
Marketing and Sales .....	9
Production, Quality and Safety of Products .....	9
Fair Procurement .....	9
Conflict of Interest .....	10
Data Integrity and Accurate Record Keeping .....	11
Records Management .....	12
Customer and Third-Party Information .....	13
Proprietary and Confidential Information .....	14



## DOING BUSINESS THE RIGHT WAY

Safeguarding Pharmascience's Assets .....	15
Use of Our Resources .....	15
Proper Use of Electronic Media .....	15



## SERVING OUR PATIENTS AND OUR COMMUNITY

Corporate Responsibility .....	16
Human Rights .....	16
Environmental Stewardship .....	16
Charitable Contributions .....	17
Protection of Personal Information and Privacy .....	17



## WORKING EFFECTIVELY TOGETHER

Equal Opportunity .....	18
Workplace Environment .....	18
Harassment .....	19



## FINAL SECTION

Accountability .....	20
Zero Tolerance .....	20
When in Doubt? Ask Questions! .....	21
Reporting Concerns and Anti-Retaliation .....	21
Reporting Channels .....	22



### **OUR COMMITMENT TO INTEGRITY:**

Actioning our values

This Code represents the foundation of our daily work and Pharmascience expects all employees to familiarize themselves with the principles of the Code, know and understand them, and to adhere to this Code.



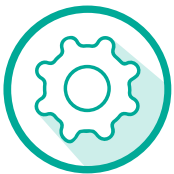
### **DOING BUSINESS THE RIGHT WAY:**

We are committed to achieving successful and sustainable results



### **SERVING OUR PATIENTS AND OUR COMMUNITY:**

We are committed to improving patient care and giving back to the communities which we serve



### **WORKING EFFECTIVELY TOGETHER:**

Stronger together

When dealing with each other, we are transparent, honest, tolerant and polite. Every employee should rely on one another respecting his/her integrity. Collaboration between employees means that we treat each other fairly and we conduct ourselves in a professional and respectful manner.



### **FINAL SECTION**

This Code cannot encompass the standards, procedures, and regulations for our company in every detail. The specific policies, processes, or procedures for individual matters which have been adopted by Pharmascience are applicable.

Business units, departments or other divisions may require additional policies, processes or procedures, which are also applicable.

Violations of this Code and other Pharmascience policies may have consequences on employment and other legal implications.



Dear Colleagues,

As the largest pharmaceutical employer in Quebec, we have worked tirelessly for 40 years to build a flagship of Quebec entrepreneurship, of which we are all very proud. At Pharmascience, we place particular emphasis on maintaining our reputation and our high standards of integrity, both in our business practices and through our involvement with our community.

Our industry is constantly evolving, and we recognize the importance of adapting our conduct to industry best practices as we move forward. That is why we are trying to provide the best tools to all to accomplish this.

I am pleased to announce that the Corporate Compliance team has introduced an enhanced **Code of Business Conduct ("the Code")**. This Code, which is tailored to new business realities, is the very foundation of Pharmascience, and sets out its standards and rules to follow. Everyone in the company is responsible for complying with and committing to this Code. Through the standards listed and outlined in the Code, we can ensure that we establish a culture of compliance and accountability across the organization based on respect for professional ethics.

The Code will therefore become an indispensable tool for Pharmascience, as it sets clear and detailed standards based on corporate values and in keeping with our organizational culture. This tool allows us to make informed decisions and be fully accountable for the decisions we make.

We are all committed to abiding by our Code. However, you may eventually become aware of an external party or a Pharmascience employee whose conduct does not comply with our Code, the company policies, the law, and/or our values. We understand that it is not always easy to report incidents of misconduct, but I strongly encourage you to speak up and report them. By doing so, you give Pharmascience an opportunity to address the situation. In order to help you fulfill your obligations, we are also introducing a Speak Up policy, alongside the launch of the Code, which will give you the tools to do so.

Remember that every gesture counts to maintain the reputation that we hold so dear. It is the duty of every Pharmascience employee, starting with me and upper management, to commit to complying with the Code in order to ensure that we are an exemplary company when it comes to respect for and compliance with standards of conduct.

Sincerely,

David Goodman



## Our Core Values

Pharmascience Inc. and its affiliates is built upon a foundation of strong corporate values and business practices.

We are fully committed to serving our customers and employing individuals with personal standards consistent with that of our company values

**THRIVE TOGETHER.**

Foster collaboration and involvement with those around you and in the community.

**OWN IT & DO IT RIGHT.**

Be resourceful, accountable, and go the extra mile to achieve excellence.

**DEDICATION TO CLIENTS & PATIENTS.**

Work with passion to deliver better patient and client outcomes.

**SIMPLER, ALWAYS BETTER.**

Ask questions, think differently, and challenge the status quo to break complexity.

**RÉUSSIR ENSEMBLE.**

Encourage la collaboration et l'implication auprès de nos pairs et au sein de la communauté.

**ASSUMER ET SE DÉPASSER.**

Sois débrouillard, imputable et va au-delà pour atteindre l'excellence.

**DEVOUEMENT AUX PATIENTS ET AUX CLIENTS.**

**LA SIMPLICITÉ À L'AVANT PLAN.**

Pose des questions, pense autrement et questionne le statu quo pour éliminer la complexité.

Travaille avec passion pour livrer de meilleurs résultats aux patients et aux clients.



**We are committed to maintaining  
the highest standards of business conduct and ethics.**

Our Code reflects the business practices and principles of behavior that support this commitment. We expect every employee to read and understand our Code and its application to the performance of your business responsibilities. Agents and contractors of Pharmascience are also expected to read, understand, and abide by both the letter and spirit of this Code.

This Code should help guide your conduct in the course of our business. Many of the principles described in this Code are, general in nature, and the Code does not cover every situation that may arise. Use common sense and good judgment in applying this Code. If you have any questions about applying the Code, it is your responsibility to seek guidance. This Code is not the exclusive source of guidance and information regarding the conduct of our business. You should consult applicable policies and procedures in specific areas as they apply.



# OUR COMMITMENT TO INTEGRITY



## *We are committed to complying with the Code*

### **Compliance with laws**

Given the highly regulated environment in which we operate, we must be vigilant in meeting our responsibilities to comply with relevant laws and regulations. This standard applies in our interactions with healthcare professionals, patients and other stakeholders, where we aim to add value and create a positive impact through educational and scientific initiatives. We are committed to maintaining an open, constructive and professional relationship with regulators on matters of regulatory policy, submissions, compliance, and product performance.

**E.g.:**

**What happens if I am faced with a situation where acting ethically conflicts with making a profit for Pharmascience?**

**Answer:**

**You must always engage in legal and ethical conduct no matter what the circumstances. Pharmascience's long-term profitability depends on our reputation. If you feel that there is a conflict between what is "right" and what is profitable, you should contact your manager or any of the other resources listed in the Code or visit the Corporate Compliance intranet page for guidance.**



# OUR COMMITMENT TO INTEGRITY

## **Antitrust and Fair Competition**

We believe in free and open competition. In addition, in most of the countries where we operate, laws are in force similar to antitrust laws in Canada and the United States and competition laws in the European Union prohibiting collusive or unfair business behavior that restricts free competition. Canada and United States antitrust and other countries' competition laws are quite complicated, and failure to adhere to these laws could result in significant penalties imposed on both Pharmascience, including its directors and officers and the employees who violated the law. There are no circumstances allowed by law to enter agreements with competitors to fix prices, terms of sale, production output, to rig bids, or to divide markets or customers. In addition, attempts to discriminate in prices or terms of sale among our customers, or to otherwise restrict the freedom of our customers to compete, may sometimes be illegal. Legal issues may also arise if we refuse to deal with certain customers or competitors. Consult Pharmascience's Antitrust Policy to learn more about this topic.

**E.g.:**

**During a dinner break at an industry conference, someone who works for one of our competitors mentioned that his company was considering increasing prices because of certain industry pressures. Everyone knows that Pharmascience is also experiencing these same pressures. Is it okay for me to discuss our pricing plans?**

**Answer:**

**No. You should never discuss pricing with a competitor. This prohibition applies equally to learning the competitor's pricing practices or plans (other than from publicly available information) and to revealing those of Pharmascience. As soon as you realize that a competitor is starting to raise this subject, you should break off the discussion, even if it means walking out in the middle of a meal. You should then immediately report what happened to your manager.**

# OUR COMMITMENT TO INTEGRITY



## Anti-corruption / Anti-bribery

Canada and many other countries have laws that prohibit bribery, kickbacks, and other improper payments. Pharmascience employees should not offer or provide bribes or other improper benefits in order to obtain business or an unfair advantage. A bribe is defined as directly or indirectly offering anything of value (e.g., money, cash equivalents, gifts, tickets for travel, sporting events or other forms of entertainment) to influence or induce action, or to secure an improper advantage. We expect all employees of Pharmascience to strictly abide by these laws. Consult Pharmascience's Anti-corruption and Anti-bribery Policy to learn more about this topic.

**E.g.:**

**I was told I have to pay a gratuity to a minor official to clear our products through customs. What should I do?**

**Answer:**

**You should not pay a customs official under any circumstance.. In case of doubt, you must consult with your manager or any of the other resources listed in the Code if the requested payment is permitted before any action is taken.**

**E.g.:**

**We use a third-party vendor to verify financial information provided by our customers. Recently, the vendor asked us to increase our payments to allow him to verify the authenticity of tax documents provided by these customers with local government tax officials. I suspect that he wants to pass this money on to the local tax officials to obtain confidential information. What should I do?**

**Answer:**

If you suspect that Pharmascience's agent is making improper payments to a government official, we are under an obligation to investigate whether this is the case and to halt such payments. You must report your suspicions to your manager or through one of the channels of communication listed in the Code.



# OUR COMMITMENT TO INTEGRITY

## **Trade Compliance (Export / Import Control)**

We comply with all import and export laws and regulations, including United States federal. These laws restrict transfers, exports, and sales of products or technical data from one country to certain prescribed countries and persons as well as re-export of certain such items from one location to another, including non-U.S. locations. Many countries in which we operate have similar laws and regulations. If you are involved in importing and exporting goods and data, you are responsible for knowing and following these laws.

**E.g.:**

**An agent approached me with an opportunity to export products to North Korea where we do not yet have sales. He has many contacts and is willing to handle all shipping and selling logistics. How should I proceed?**

**Answer:**

**Before shipping products across borders, review the export and import laws of the countries involved, and set up a plan for compliance. Find out whether the countries or parties involved are subject to any trade restrictions. Conduct a proper background check on your agent and the customer involved and speak with your manager or any of the other resources listed in the Code.**

# OUR COMMITMENT TO INTEGRITY



## **Marketing and Sales Practices**

We are committed to a highly ethical standard of conduct in the marketing and sale of our products, and we shall conduct these activities in compliance with applicable rules, laws and regulations. It is our responsibility to accurately and fairly represent Pharmascience and our products in our marketing, advertising and sales practices and materials. Deliberately misleading messages, omissions of important facts or false claims about our products, individuals, competitors or their products, services, or employees are inconsistent with our values.

## **Production, Quality and Safety of Products**

We discover, develop, manufacture and distribute high-quality products that meet regulatory requirements, and pursue quality in both our products and processes.

We protect patient safety by identifying, assessing, managing and reporting any product-related risks in a timely manner.

## **Fair procurement**

We engage in open and fair procurement activities regardless of nationality or the size of the transaction. Suppliers are selected on a competitive basis based on total value, which includes quality, suitability, performance, service, technology, and price. We strive toward establishing mutually beneficial relationships with our suppliers based on close cooperation and open communication. Terms and conditions defining our relationship with suppliers are communicated early in the supplier selection process. We expect third parties with whom we work to comply with the law, to adhere to ethical business practices, and to observe our standard requirements concerning labor, health, safety, environmental protection and management.



# OUR COMMITMENT TO INTEGRITY

## **Conflict of Interest**

We have an obligation to make sound business decisions in the best interests of Pharmascience without the influence of personal interests or gain. Pharmascience requires you to avoid any conflict, or even the appearance of a conflict between your personal interests and the interests of our company. Consult the Company's Conflict of Interest Policy to learn more about this topic.

You are required to immediately disclose any business or personal conflict that may influence your business decisions, that arise or even appear to arise to your supervisor or any of the other resources listed in the Code. Newly hired employees are required to disclose any business or personal conflict before their employment at Pharmascience.

**E.g.:**

**My brother owns a business and wants to be a Pharmascience supplier. May I direct him to a Pharmascience manager?**

**Answer:**

**Yes. You may direct your brother to the person who may be interested in his product or service. However, your manager and the person making the purchasing decision should be told about the relationship. Normal Pharmascience procedures for selecting a vendor must be followed to make sure there is no appearance of special treatment for your brother.**

# OUR COMMITMENT TO INTEGRITY



**E.g.:**

**My wife works for one of Pharmascience's competitors. Does this constitute a conflict of interest?**

**Answer:**

**No, not necessarily. However, you should discuss the situation with your manager to make sure you are not given assignments that would create a conflict of interest. In no event should you disclose our company's confidential information to your spouse or solicit from your spouse confidential information about her employer.**

## **Data Integrity and Accurate Record Keeping**

Accurate and reliable records are crucial to our business. We are committed to maintaining accurate company records and accounts in order to ensure legal and ethical business practices and to prevent fraudulent activities. We are responsible for helping ensure that the information we record, process, and analyze is accurate, and recorded in accordance with applicable laws or accounting principles. We also need to ensure that it is made secure and readily available to those with a need to know on a timely basis. All company records must be complete, accurate, and reliable in all material respects. There is never a reason to make false or misleading entries. Undisclosed or unrecorded funds, payments, or receipts are inconsistent with our business practices and are prohibited.



# OUR COMMITMENT TO INTEGRITY

## Records Management

Our records are our corporate memory, providing evidence of actions and decisions and containing data and information critical to the continuity of our business. Records consist of all forms of information created or received by Pharmascience, whether originals or copies, regardless of media. All records are the property of Pharmascience and should be retained in accordance with our Document Retention and Destruction Policy

**We have been cleaning our work area and think we can dispose of product test records from several years ago. Is there someone we should check with before we do this?**

**Answer:**

Yes. Pharmascience has a Document Retention and Destruction Policy applicable to documents of each business units and departments. In particular, there may be ongoing tax review, government contract requirements, or legal proceedings that require retention beyond the normal timeframes. Consult the Document Retention and Destruction Policy and in case of doubt, ask your manager or any of the other resources listed in the policy, who will check to see if the records can be destroyed.

**I store all of my critical documents on my laptop's hard drive. Is this sufficient?**

**Answer:**

No. Laptops and desktops are not centrally backed up and are not considered appropriate or secure storage locations for confidential information. Such information must be stored in appropriate databases or network storage.

**I have some records in my files that I don't use anymore. Can I discard them?**

**Answer:**

Before you dispose of a company record, you should refer to Pharmascience's Document Retention and Destruction Policy to determine how long the record must be held in your files. You must also be sure to verify that the record is not subject to a Tax Hold or Legal Hold. If you have questions about the correct retention period for a company record, speak with your manager or any of the other resources listed in the policy.



# OUR COMMITMENT TO INTEGRITY



## **Customer and third-party information**

Keeping customer information secure and using it appropriately is a top priority for Pharmascience. We must safeguard any confidential information customers, or third parties share with us. We must also ensure that such information is used only for the purposes for which it was collected unless further use is allowed by law. Customer or third-party confidential information can include customer information, personal information, trade secrets, intellectual property, financial data, health records, and more.. We do not disclose any information about a third party without the written approval unless legally required to do so (for example, under a court-issued subpoena).





# OUR COMMITMENT TO INTEGRITY

## **Proprietary and Confidential Information**

One of our most important assets is our confidential information. As an employee of Pharmascience, you may learn of information about Pharmascience that is confidential and proprietary. You also may learn of information before that information is released to the general public. Employees who have received or have access to confidential information should take care to keep this information confidential. Confidential information includes non-public information that might be of use to competitors or harmful to Pharmascience or its customers if disclosed, such as business, marketing and service plans, financial information, internal communications, product architecture, source codes, engineering and manufacturing ideas, designs, databases, customer lists, pricing strategies, personal information, personally identifiable information pertaining to our employees, customers or other individuals (including, for example, names, addresses, telephone numbers and social security numbers), and similar types of information provided to us by our customers, suppliers and partners.

Every employee has a duty to refrain from disclosing to any person confidential or proprietary information about us or any other company learned in the course of employment here, until that information is disclosed to the public through approved channels. You should also take care not to inadvertently disclose confidential information. Materials that contain confidential information, such as memos, notebooks, computer disks and laptop computers, should be stored securely. Consult Pharmascience's Confidential Information Policy to learn more about this topic.

**E.g.:**

**How do I know if something is a company trade secret or confidential?**

**Answer:**

**You should treat everything you learn about Pharmascience and its business as a trade secret or confidential, unless it is obviously a matter of general public knowledge. A particular document or other material containing information does not need to be marked "trade secret" or "confidential" to be treated as such. If you have any questions, you should speak with your manager or any of the other resources listed in the Code or visit the Corporate Compliance intranet page.**



## *We are committed to achieving successful and sustainable results*

### **Safeguarding Pharmascience's Assets**

All employees must protect Pharmascience assets, such as equipment, inventory, supplies, funds, and information. Treat company assets with the same care you would if they were your own. Use Pharmascience resources only to conduct company business. No employee may commit theft, fraud or embezzlement, or misuse company property. Our intellectual property is among our most valuable assets. Intellectual property refers to creations of the human mind that are protected by various national laws and international treaties. Intellectual property includes copyrights, patents, trademarks, trade secrets, design rights, logos, expertise, strategies and other intangible industrial or commercial property. We must protect and, when appropriate, enforce our intellectual property rights. We also respect the intellectual property belonging to third parties. It is our policy to not knowingly infringe upon the intellectual property rights of others.

### **Use of Our Resources**

Pharmascience provides an array of information and technology resources intended to maximize our efficiency in carrying out your job. Please remember that these tools are company property and must be used in a manner that reflects positively on Pharmascience and all who work here.

### **Proper Use of Electronic Media**

Pharmascience uses global electronic communications and resources as routine parts of our business activities. However, they can present risks. Therefore, it is essential that electronic resources used to perform company business are protected to ensure that these resources are accessible for business purposes and operated in a cost-effective manner, that our company's reputation is protected, and that we minimize the potential for legal risk.



# SERVING OUR PATIENTS & COMMUNITY

*We are committed to improving patient care and giving back to the communities which we serve*

## **Corporate Responsibility**

We pride ourselves on being a company that operates with integrity, makes good choices, and doing what's right in every aspect of our business. We will continually challenge ourselves to define what being a responsible company means to us, and work to translate our definition into behavior and improvements at Pharmascience. We seek to align our social and environmental efforts with our business goals and continue to develop both qualitative and quantitative metrics to assess our progress.

## **Human Rights**

We are committed to upholding fundamental human rights and believe that all human beings around the world should be treated with dignity, fairness, and respect. Pharmascience will only engage suppliers and direct contractors who demonstrate a serious commitment to the health and safety of their workers, and operate in compliance with human rights laws. Pharmascience does not use or condone the use of slave labor, child labor or human trafficking, denounces any degrading treatment of individuals or unsafe working condition.

## **Environmental Stewardship**

We are committed to conducting business in an environmentally responsible manner and strive to improve our performance to benefit our employees, customers, communities, and the environment. We use energy wisely and efficiently and employ technology to minimize any risk of environmental impact. Employees whose work affects environmental compliance must be completely familiar with the permits, laws, and regulations that apply to their work. All employees are responsible for making sure that Pharmascience's business is conducted in compliance with all applicable laws and in a way that is protective of the environment.

# SERVING OUR PATIENTS & COMMUNITY



## Charitable Contributions

We support community development throughout the world. Pharmascience employees may contribute to these efforts or may choose to contribute to organizations of their own choice. However, you may not use company resources to personally support charitable or other non-profit institutions not specifically sanctioned or supported by Pharmascience. You should consult with your supervisor or any of the other resources listed in the Code if you have questions about permissible use of company resources.

## Protection of Personal Information and Privacy

Pharmascience respects the confidentiality of the personal information of employees, patients, healthcare professionals and any other stakeholder and will treat such personal information in accordance with applicable privacy laws and regulations. The collection and use of personal information is only authorized when there is a legitimate and lawful reason, and access is only granted to appropriate personnel. Disclosure of personal information to anyone outside Pharmascience under any circumstances must be approved in accordance with our policies.

In all cases, the collection, storage, use, disclosure or otherwise processing of personal information will be made by Pharmascience in accordance with applicable law.

Consult Pharmascience's Global Privacy Policy and Employee Data Privacy Policy to learn more about this topic.

### **E.g.:**

**I just received a call from a government agency requesting information on one of our customers. Should I provide the requested information?**

### **Answer:**

You should speak with your manager or any of the other resources listed in the Code before providing any information about a customer to a third party. Pharmascience always seeks to cooperate fully with law enforcement investigations, but it must also take into account certain additional considerations, such as the potential liability to a customer for providing information beyond that which is appropriate under the law.



# WORKING EFFECTIVELY TOGETHER

## *Stronger Together*

### **Equal Opportunity**

Having a diverse workforce—made up of team members who bring a wide variety of skills, abilities, experiences and perspectives—is essential to our success. We are committed to the principles of equal employment opportunity, inclusion and respect. Always take full advantage of what our team members have to offer; listen and be inclusive. We do not tolerate discrimination against anyone—team members, customers, business partners or other stakeholders—namely on the basis of race, color, religion, ethnicity or national origin, sex (including pregnancy), age, disability, sexual orientation, gender identity or any other status protected by the laws or regulations in the locations where we operate.

### **Workplace Environment**

Pharmascience strives to provide a safe and healthy workplace for employees, customers and visitors to its premises. All managers have the responsibility of ensuring proper safety and health conditions for their employees. Management is committed to maintaining industry standards in all areas of employee safety and health, including industrial hygiene, ergonomics and safety. To support this commitment, employees are responsible for observing all safety and health rules, practices and laws that apply to their jobs, and for taking precautions necessary to protect themselves, their co-workers and visitors. Employees are also responsible for immediately reporting accidents, injuries, occupational illnesses and unsafe practices or conditions to their manager.

Threats, acts of violence and physical intimidation are strictly prohibited. Possession of weapons on the job or on Pharmascience premises is prohibited. Talk of violence or joking about violence will not be tolerated. As is the case with any violation of the Code, employees have a responsibility to report any unsafe behavior or condition regardless of whether they are directly involved or a witness.

# WORKING EFFECTIVELY TOGETHER



## Harassment

Every employee has a right to a work environment free from harassment, regardless of whether the harasser is a co-worker, supervisor, manager, customer, vendor or visitor. Harassment can include any behavior (verbal, visual or physical) that creates an intimidating, offensive, abusive or hostile work environment. In addition, any harassment that either impacts or influences wages, hours, working conditions or employment advantages is specifically prohibited. Unlawful harassment includes harassment based on race, color, religion, ethnicity or national origin, sex (including pregnancy), age, disability, sexual orientation, gender identity or any other status protected by the laws or regulations in the locations where we operate. Sexual harassment includes harassment of a sexual nature of a person of the same or opposite sex as the harasser. Pharmascience is also committed to supporting employees who are victims of domestic violence. Employees should refer to the Company's Policy on the Prevention of Harassment, Discrimination and/or Violence in the Workplace for more information. As is the case with any violation of the Code, you have a responsibility to report any harassing behavior or condition regardless of if you are directly involved or just a witness. Retaliation for making a complaint or for assisting in the investigation of a discrimination or harassment complaint is prohibited.





## FINAL SECTION



### **Accountability**

All managers are expected to develop in employees a sense of commitment to the spirit, as well as the letter, of the Code. Managers are also expected to ensure that all agents and contractors performing services on behalf of Pharmascience conform to Code standards. Additionally, it is the responsibility of each employee to apply common sense, together with your own highest personal ethical standards, in making business decisions where there is no stated guideline in the Code.

### **Zero Tolerance**

Violations of the Code will not be tolerated. Any employee who violates the standards in the Code may be subject to disciplinary action, which, depending on the nature of the violation and the history of the employee, may range from a warning or reprimand to and including termination of employment and, in appropriate cases, civil legal action or referral for regulatory or criminal prosecution.



# FINAL SECTION



## **When in Doubt? Ask Questions!**

You should not hesitate to ask questions about whether any conduct may violate the Code, voice concerns, or clarify gray areas. In addition, you should be alert to potential violations of the Code by others and report potential misconduct, without fear of any form of retaliation. Recognizing potential misconduct and doing what's right in all Pharmascience business activities is your responsibility. When engaging in business activities, consider the following:

- What feels right or wrong about the planned action?
- Is the planned action consistent with the Code and Pharmascience's policies?
- How will the planned action appear to your colleagues, your manager, your family, or the general public?
- Would another person's input help to evaluate the planned action?

## **Reporting Concerns and Anti-Retaliation**

Pharmascience aims to conduct business with the highest standards of ethics, honesty and integrity, and recognizes that you have an important role to play in maintaining in this goal. Any employee of Pharmascience concerned about any form of malpractice, improper action, or wrongdoing by Pharmascience, its employees or other stakeholders is required to bring the potential misconduct to the attention of Pharmascience. Employees with knowledge of potential misconduct, or employees who received a report of potential misconduct, should not remain silent and must report the matter through one of the channels of communication listed below without disseminating the information any further. We take all matters of misconduct, improper action or wrongdoing very seriously and you must report any potential misconduct or behavior that is not in accordance with the Code, or the policies to which it refers. Pharmascience prohibits retaliation, in any form, against any employee who, in good faith, reports any potential misconducts, who provides information or who assists in the investigation of a potential misconduct. Retaliation against that person for reporting such concern or potential misconduct is itself misconduct and must be reported.



# FINAL SECTION

## Reporting Channels

If you believe there has been an actual or potential misconduct, whether or not you wish to speak up, you must immediately inform one of the people listed below, since they are best equipped to answer your questions and provide you with guidance: Your immediate supervisor; Your supervisor's supervisor; A business partner – Human Resources or Legal; and/or A Vice President.



Service d'assistance *Brisez le silence*

*Speak Up Helpline*

Depending on the situation and whenever possible, we recommend that you notify your immediate supervisor first and then escalate if necessary. If you are uncomfortable speaking directly to any of the above persons, or if you prefer to remain anonymous, please contact the **Speak Up Helpline** at [www.pmsspeakup.com](http://www.pmsspeakup.com) or through the **Corporate Compliance intranet page**, accessible from the Horizon homepage or the Legal Affairs intranet page. The Speak Up Helpline is available 24 hours a day, seven days a week and is managed by an independent third party.

### **Resource and Information Center**

Visit Pharmascience's Corporate Compliance intranet page accessible from the Horizon homepage or the Legal Affairs's page to learn how to contact the Speak Up Helpline through one of the various intake channels or learn more about Pharmascience's compliance program.