



Always Ahead

This booklet and the guidelines described in it do not constitute a contract or proposal for a contract with the distributor, and do not establish legally enforceable expectations or rights that are.

Medison reserves the right, at its exclusive discretion, to change any aspect of its Code of Ethical Conduct, including the content of this booklet and the company's policy, at any time and for whatever reason, without advanced notification. If a contradiction is identified between the content of this booklet and the policy that will be valid at that time, the company is entitled to act in accordance with that policy. Future changes will be entered into the version contained in Medison's procedures folder, which will constitute the most up to date version of the Code.

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Message from our Founder and CEO

Dear employees,

Since Medison's establishment in 1996, our company has steadily grown from year to year. You are the power driving this growth, and I thank each and every one of you for your significant contribution to our success. In order to continue this momentum and retain our position in our dynamic and competitive global market, we must strive for excellence in all spheres of operation. One of the most important challenges we face is to uphold a high ethical standard. Impeccable ethical conduct is, first and foremost, our duty as human beings toward one another, in order to improve our society and create a better world.

In our work and area of expertise, we are duty-bound to uphold and preserve ethical rules for the benefit of all patients, to ensure them they receive the best treatment and to instill trust. As stated in our vision, patients are our primary motivation: we strive to deliver the most innovative and unique healthcare solutions to patients. This is the standard that we have set for ourselves, as well as the criteria expected of us by the companies we represent as their operating arm in all the countries we operate in.

Our Code of Ethical Conduct reflects the values we believe in and how we conduct ourselves professionally and personally – with our families and friends.

Moreover, uncompromising compliance with this Code protects our reputation as a company and as individuals. It directly impacts Medison's success and profitability, as well as the atmosphere in the workplace. Therefore, adhering to our Code is the joint responsibility of us all, managers and staff alike.

We expect each of you to read the Code carefully, with an emphasis on the chapters related to your specific field of specialization. We encourage you to discuss it openly with your managers and colleagues, and to raise any questions or problems that arise with the relevant party - or feel free to contact me directly at: meir@medison.co.il

Sincerely,



Meir Jakobsohn, Founder and CEO



PART 1:

Thinking Right. Taking action.

At Medison, we take pride in the work we do and aim to always conduct our business ethically.

Being a business that is built on ethics, quality and integrity will enable us to continue growing our business and strengthening our partnerships with our stakeholders, patients, and customers.

Whatever our role at Medison, we are all responsible for bringing the Code's principles to life. Each of us is responsible for understanding the important legal and ethical issues that affect our business and for conducting ourselves with integrity, at all times. Not only must we comply with applicable laws and policies, but we must also exercise good judgment in making informed decisions. As a global and growing company, know that this Code applies to all Medison employees, in any location around the world and in any job capacity. This includes all employees, contract employees, and directors. Medison also expects that our suppliers, distributors and any third parties acting on behalf of Medison comply with all relevant standards described in the Code.

Our work is central to our lives, helps formulate our sense of self-worth and influences our sense of satisfaction. Medison's Code of Ethical Conduct serves to steer us in the right direction and ensure we awake every morning secure in the knowledge that in our work, we contribute to the health and welfare of our customers, improve their quality of life and work in a company that upholds the highest ethical standard possible. The Code helps us and guides us with common ethical issues and dilemmas that we encounter in the course of our work.

Our values, which act as a compass, are based on matters in which we believe and that guide us in all our actions. They guide the way we think, act and make decisions as we learn to work better together.

Our values remind us of the way to conduct business and we believe that our ethical choices lead us to our success.

Acting ethically is the only way Medison can achieve its mission.

Medison's Code of Ethical Conduct

In a competitive and complex business environment, we cannot always assume that the proper course of action is always clear, or that the actions of every person are always motivated by good will and positive values. Therefore, we need rules and guidelines to ensure fair, ethical and proper conduct in every professional situation. Adherence to these rules is an important component of Medison's operations.

Ethical conduct does not merely mean compliance with legal regulations or company procedures. Sometimes it requires relinquishing an advantage or immediate profit, based on the knowledge that over the long term, upholding high ethical standards will benefit our patients, customers, employees and shareholders.

Please read this booklet carefully and keep it handy. The content addresses most of the issues that relate to our ongoing conduct as Medison employees. While extensive and comprehensive, there is no replacement for the company's procedures and your own judgment to help answer any other questions. The Code is designed to help you make the right decisions, provide information and guidance to act correctly in situations where questions or issues arise.

To Whom Does the Code Apply?

Every person who works at Medison or acts in the company's name, must adhere to this Code, obey the law and company policy. The Code is applicable to all employees and managers, at all levels, as well as to consultants, contract workers and temporary employees at all Medison sites, branches and subsidiaries.

How Can We Help Uphold the Code's Values?

Adherence to the law, to ethical conduct and to company policy is the responsibility of all Medison employees. This booklet provides guidelines for ethical conduct, but it is not a substitute for familiarity with the policies and procedures pertaining to your role and position. It is your duty to know, understand and follow them.

Protecting Medison and its employees against unethical conduct and deviation from company policy are the joint responsibility of us all. As employees, you play a central role in adherence to the Code, and your assistance and cooperation are vital to ensure we maintain this high ethical standard.



Personal Responsibility

Act honestly and with integrity, obey the law and Medison's policy, and protect the company's reputation and image.

Recognize and strictly adhere to the rules, the laws and company procedures when acting in the company's name.

Respect your fellow person: act respectfully towards your colleagues, customers, business partners, and competitors.

Do not hesitate to ask: if you have any doubt as to the proper course of action, the law, company policy, ethics or any other issue related to conduct, check the Code or procedures, ask your manager, the Compliance officer or Human Resources department in the Compliance Department.

Immediately report any infraction or suspected violation of the law, the Code or company policy, as well as if anyone asks you or pressures you to act in a manner that may constitute a violation. You can report this to your direct manager or the Compliance Department, as well as issue an anonymous report through Whistleblower form.

Making Ethical Decisions

Medison is committed to teamwork, communication, and accountability, based on dialogue, transparency and honesty. If you have any doubt regarding the ethics or legality of a certain issue, do not hesitate to ask or raise the issue for discussion. If the Code, policy and procedures do not provide an answer or explanation, contact your manager or other relevant party. Continue asking questions until you are confident that you are "doing the right thing." No Code can address every situation. When you face an ethical dilemma that is difficult to resolve, ask yourself the following questions:

- Is the course of action legal and ethical?
- Does it comply with Medison's Code of Ethical Conduct, policy and values?
- Will I feel comfortable and true to myself when explaining my choice to my friends or relatives?
- Will I be pleased if my actions were to be made public in a newspaper, on television or on the Internet?

Reporting Violations: The Foundation of Compliance with the Code

If you know or suspect any Code violation or other illegal or unethical behavior or business practice, you must promptly report it to your manager and/or appropriate departments, such as Compliance, Human Resources, or issue an anonymous report via the Whistleblower form. Medison will investigate the information provided and take appropriate action.

If a problem, or even a potential problem, is brought to our attention early enough, we will be able to solve it faster and prevent damage to the company and its employees. Immediate reporting enables us to investigate the matter, take suitable and swift steps and perform corrective actions if necessary.

If it is found that an investigation should be carried out, please be patient and enable us to complete it with appropriate thoroughness and sensitivity. You can track the progress of the issue you reported by contacting the party with whom you communicated but we will not always be able to disclose information during the investigation. The information disclosed will be revealed only to relevant persons who are responsible for investigating the report and to suggest appropriate solutions.

Medison protects employees that report violations or suspected violations in good faith, or those who cooperate in an investigation or other procedure related to the Code of Ethical Conduct. We prohibit any threat to harm their position or advancement. This policy is applicable to reports made via the channels specified in the Code, or report made via the Whistleblower form. The reporter's details are kept confidential and will only be revealed to those who must be informed to handle the case. In exceptional cases, we may be forced to reveal the reporter's identity to the authorities.

Anonymous Reporting of a Code or Compliance Violation

We realize that for various reasons you might prefer not to identify yourself. If you wish to remain anonymous, please use the anonymous online reporting option, designed specifically for this purpose, which is located in the "Compliance" page on Medison's website (www.medisonpharma.com).

Medison will deal with every report with the utmost gravity and commitment to discretion, even if it is made anonymously. If the investigation does indeed reveal a violation of the Code or of the law, appropriate steps will be taken.



Anti-Retaliation

Retaliation against someone who seeks advice, raises a concern, reports misconduct, or provides information in an investigation is strictly prohibited.

Some examples of retaliation include denial of benefits, termination, demotion, suspension, threats, harassment, or discrimination. If any individual, regardless of his or her role at Medison, retaliates against a colleague who has reported a potential violation, Medison will take appropriate action even when no violation was confirmed.

Anonymous reporting of a code or compliance violation

- Go to Medison's corporate website: www.medisonpharma.com
- Click on the "Compliance" section, located in the footer.
- Scroll down to the "Anonymous reporting of a code or compliance violation".
- Fill in the information.
- Press "send".

Extended Executive Responsibility for Managers

As managers at Medison, you have a special responsibility to ensure compliance with the Code and prevent infringements for the areas for which you are responsible. Medison's management and your subordinates expect you to act as a personal role model and to encourage adherence to the Code and the company's policy.

- Foster a culture of ethics and compliance through personal leadership.
- Act as a role model for ethical and responsible behavior.
- Demonstrate high ethical standards in your everyday work and expect the same from your subordinates.
- Create an environment of openness and trust, where your team members feel secure and comfortable to ask questions and raise concerns.
- Cultivate an achievement-oriented environment, without creating an impression that ignoring company policies or "cutting corners" is acceptable. Never create an environment in which your employees feel that they must bend the rules to meet targets, and do not tolerate such an approach.
- Train employees, consultants, contractors and temporary workers/
- Ensure subordinates undergo all training related to the Code and their specific jobs and periodically refresh their knowledge of relevant policies and procedures.
- Ensure that suppliers, consultants, contractors and temporary workers under your responsibility act in compliance with the Code and company policy.

Prevent and Reporting Problems

Take initiatives and proactive steps to prevent problems before they occur and do not ignore them if they do take place. Create an environment in which employees feel they can approach you with any problem or issue.

Respond promptly to questions and problems in a way that makes your employees feel secure and confident in approaching you.

Report any violation or suspected violation that was brought to your attention even if it is not within your sphere of responsibility.

Compliance Committee

Medison established a Corporate Compliance Committee that is responsible for reviewing aspects related to ethical conduct, work procedures, risk management, tracking and monitoring.

The Compliance Committee formulated a comprehensive plan for Code compliance, which includes assimilation of work procedures, training and ongoing procedure updates.

The Compliance Committee is engaged, inter alia, in the promotion of ethical thinking and behavior among company employees, monitoring the effectiveness of the plan, discussing ethical conflicts, as well as ensuring that Medison complies with international standards and operates according to the valid procedures of companies we represent.

The Compliance Committee also reviews, from time to time, the need to adopt changes in the Code.

Assist the Compliance Committee by studying the Code and reviewing it, connecting it to daily operations and tasks, raising questions and reporting violations and improper conduct.



As company managers, conduct open dialogue on ethical issues and ensure that your employees are familiar with the Code and understand it.

Enforcing the Code

Medison attributes great importance to upholding ethical conduct and the values described in the Code. Violating the Code, company policy or the law may result in sanctions, including dismissal. The Company is entitled to initiate enforcement if a manager fails to acknowledge and ignores improper behavior or fails to take steps to correct it.

Our Vision

We strive to deliver the most innovative and unique healthcare solutions to patients.

Medison's employees are the core of our company's strength and a source of pride. Our company's values guide everything we do and are the foundation on which we rely to achieve our mission and realize our vision.

Our Values

Integrity: Each of us is responsible for upholding Medison's reputation and high standards by taking ownership of performance with integrity. When we act with integrity, we earn respect and do our best for patients.

Professionalism: We aim for excellence, constant improvement and strive for achievements while upholding the company's standards, carrying out proper managerial procedures and targeting business objectives.

Trust and mutual respect: We aspire to be attentive and sensitive to our fellow person, our community and our environment, as well as create a workplace imbued with honesty, openness and tolerance.

Innovation and creativity: We welcome change, new initiatives and business development.

Service and cooperation: We act in a way that enables all departments to work in cooperation with each other and deliver efficient, high quality service, internally and externally.

Compliance with the Medison Code of Ethical Conduct

We pledge complete and uncompromising compliance with the Medison Code of Ethical Conduct, with a complete understanding of its vital importance in guiding our actions and achieving our business objectives.



PART 2:

Principles and Minimum Requirements Included in Medison's Procedures Compliance Program

Medison's Compliance Program

Medison's compliance program is designed to support legal and ethical conduct throughout the company. The Compliance department oversees the Compliance Program and works to address risk areas, implement the program within the organization and enforce adherence to the program.

The Compliance department is responsible for ensuring that the company fulfills its obligations, including required training, reporting and monitoring.

Elements of our Compliance Program include:

- Implementing written policies, procedures and standards of conduct.
- Conducting effective training and education.
- Developing effective lines of communication.
- Conducting internal monitoring.
- Enforcing standards through well-publicized disciplinary guidelines.
- Responding promptly to detected deviations and undertaking corrective action.

Medison's Monitoring Program

Monitoring and assessing the effectiveness of our compliance program is one of the primary responsibilities of the Compliance department. Testing is conducted to ensure compliance to the relevant laws, regulations, codes of practice and internal policies and procedures.

The objectives of the monitoring review are to identify any flaws in our controls and procedures and evaluate the likelihood of future discrepancies and risk associated with each underlying activity.

The monitoring is risk-based, whereby areas of higher risk levels are monitored more frequently.

Monitoring is performed on a regular basis and the results are submitted to senior management for review to ensure prompt actions are taken when necessary.

Terms and Definitions

Hospitality – meals, lodging, registration fees and travel expenses for health care professionals pertaining to activities.

Regulatory approval – obtaining approval by a regulatory authority to market the medical product.

HCP (Health Care Professional) – any person, institution, or entity that during the course of his or her professional operations may influence the prescription, purchase, supply, or administration of a medicinal product or has the ability to influence the specified above. This definition includes physicians, nurses, pharmacists and physician unions, in addition to an administrative or clinical support team that provides support to healthcare professionals.

HCO (Health Care Organization) - Organizations that provide health services to patients, or support the provision of health services (e.g. through administrative activities that promote access to care). Health care organizations include both non-profit and for-profit organizations.

Patient Organization – A non-profit organization set up to help improve the quality of patients' lives. The patients' organization does not include medical centers, private patients, or other Non-Profit Organizations.

Third Party – any person, consultant or partner companies that works for Medison or in conjunction with Medison in various activities.

SOP – Standard Operating Procedures – documented work procedure or process that provide training and orientation on implementation and enforcement of written policies. Adequate implementation of procedures will result in compliance with the requirements.

Sponsorship – Entails providing funding to medical centers, organizations, or associations as support in exchange for material commercial benefit.



Fair Market Value (FMV) – Payment that is reasonable and corresponds with the standard rates of payment on the market.

Event / activity – a meeting that was organized, controlled, or financed by Medison or on behalf of Medison designed to inform physicians or the general public about products in order to provide them with scientific information, or to engage with them for legitimate business purposes pertaining to Medison’s business.

Scientific Meeting – activity dedicated to expanding scientific and professional knowledge on the issues displayed.

Bribe – the proposal, promise or granting of a benefit (financial or otherwise) in order to unlawfully affect the actions and decisions of government authorities and decision-makers in public and commercial entities in order to increase business results.

Corruption – prohibited activities that take place through illegitimate or immoral measures and that do not comply with ethical standards. Bribery is a form of corruption.

Support – any support of medical or scientific institutions, organizations, or associations without receiving any benefit or marketing profit in consideration for the support.

Donation – financial support to a Non-Profit Organization, in accordance with Section 46 of the Income Tax Ordinance.

Relations with Patients, Customers, Suppliers, the Medical Community, and Government Officials

Medison is subject to many rules and regulations designed to protect patients and improve the quality of healthcare services. In our contact with patients, parties in the medical sector, suppliers, government bodies, insurers and customers, we must demonstrate our commitment to providing the optimal solutions that meet patients’ needs and conduct ourselves in an ethical, fair, respectful and supportive manner.

As a global company, the laws and regulatory requirements of one country may apply to activities in another country. In the event that the local laws and regulatory requirements differ from Medison’s policies, the stricter rule shall apply.

In all our operations, we stringently comply with the local laws, the local Ministry of Health’s regulations and relevant international standards, including related to corporate governance, ethics and transparency.

All scientific and marketing activities with healthcare providers (physicians, other medical professional, and health institutions) are designed to ensure the informed and efficient use of our products and to improve patients’ healthcare.

These activities include medical research, enrichment of knowledge, training, improvement of professional conduct, and promotion of our products and services. We use a variety of communications channels to provide information in any manner permitted by law. The information we provide is accurate and reliable. Anti-Bribery and Corruption

There is a strict prohibition on any bribery and act of corruption, either in our direct business dealings or by a third party acting on our behalf. No bribe, fee, or any other payment considered inappropriate may be made or offered. In addition, no promise of anything of value may be given to obtain any business gain or influence decisions. We comply with all applicable anti-bribery and anti-corruption laws, wherever we do business.

Medison vehemently abstains from any form of improper or undue influence and corruption in all its contacts with government officials and decision makers in the public and commercial sectors, as well as stringently complies with all the relevant laws and regulations governing the industry.

Medison forbids any attempts at exerting undue influence on government officials in order to obtain regulatory easement or advance commercial interests, as well as attempts to purchase confidential information from government bodies.

Do not offer, promise, or give any payment, gift, service, or any object of value with the intent to exert undue influence on the actions and decisions of government officials or decisionmakers in public and commercial agencies and companies.

Do not hire the services of a third party for actions that we would not perform on our own.

Familiarize yourself and learn all the rules pertaining to giving gifts, grants and other benefits, as detailed in the company’s procedures, and pay attention not to deviate from them. In case of doubt, consult with your superior about the ethics of a particular action, or with the company’s Compliance Officer.



Avoiding Conflict of Interest

A conflict of interest occurs when an employee's personal interests may improperly impact actions related to his or her work, such as taking advantage of his or her position to generate personal profit, working for a competing company or giving unfair preference to customers or suppliers. Even the appearance of a conflict of interest may damage your reputation or that of the company.

We are all obligated and committed to acting professionally, fairly and impartially, as well as to make business decisions without regard for personal benefit. We must avoid situations in which our personal interests, activities outside the company, financial interests or relationships may conflict with the best interests of the company or may appear to conflict with them.

When we avoid situations of conflict of interest, we exercise proper discretion on behalf of Medison and our patients' well-being, as well as do not promote personal interests.

When working with suppliers, customers and other parties, always act objectively, professionally and fairly.

Avoid situations in which allegations of improper considerations that influence business decisions may be made.

Do not ask for and do not accept payment, commissions, loans, favors or services in consideration for doing business with Medison.

Be extremely careful when accepting gifts from people or parties working with Medison. Refuse to accept gifts of substantial monetary value. Consult with the company's Compliance Officer if the matter seems unclear.

Avoid business relations with family members, friends and anyone you know well or have a personal relationship. If such a situation develops, immediately inform your manager, who will decide whether to appoint another employee for the task.

When you are invited to visit a customer or supplier, an exhibition or professional conference locally or abroad, verify that financing of the travel expenses, cost of participation in events, accommodation and hospitality comply with the company's rules of ethics and procedures. For additional information, refer to the procedure on organizing conferences.

Refraining from Unfair Competition

A market economy allows and encourages competition between industrial and commercial organizations. Competitors may occasionally become tempted to use malicious means to gain an unfair advantage against its competition or to mislead the public at the expense of the competition.

Deception can create a misrepresentation of the product or services of the competitor, such as a false declaration about the manufacturing process of a product that might refer to product safety, creating a misleading impression.

Additional examples of unfair competition include slandering the business of another or its activities, industrial or commercial espionage and unfair conduct with regards to confidential information, such as breach of contract or breach of trust. The anti-trust laws and competition laws seek to ensure that business compete on quality, price and service level.

Medison believes in fair competition and does not use illegitimate means to gain control of markets in which it operates, block competition or contact with the customers or suppliers or take pricing steps that may cause damage to its customers. In addition, Medison employees are prohibited from stealing information, possessing information about commercial secrets that were obtained without the consent of its owners or soliciting to others to disclose said information.

Medison recognizes the value of competition laws and complies with such laws in every country in which it conducts business.

Do not discuss or reach agreements with existing or potential competitors relating to pricing policies, discounts and other sales conditions, dividing markets or customers and the sale (or non-sale) of Medison products or their products.

Do not offer or give bribes or any favors to customers or suppliers with the goal of promoting our business or causing damage to competition.

Do not discuss and do not reach any agreements with distributors and wholesalers regarding retail prices.

Be especially careful to avoid any actions or statements that may create the impression of unfair competition or misuse of our position in the market.

Do not scorn or make negative statements about the competition. Always focus on our advantages and those of our products and not on the competition.



PART 3:

Thinking right.

Interactions with Healthcare Professionals

We interact with healthcare professionals (HCPs) and other customers in many ways, including medical information communications, promotional activities, research and continuous education. We conduct all interactions with these individuals with integrity, as well as in compliance with applicable laws, regulations and industry codes. HCPs may include any person in a position to prescribe, purchase, recommend, supply, or administer Medison products or to otherwise influence the use of our products.

We interact with HCPs in a legal and ethical manner for the benefit of our patients. Decision making related to acquisition and usage of medication is subject to rules and regulations designed to protect patient safety and health.

Do not promise or give anything of value with the goal of encouraging or offering incentives to parties in the health sector to prescribe, purchase, indicate, use, or recommend company products.

Compensation for parties in the healthcare sector for their services must correspond with the services provided and reflect market value, according to the terms agreed upon in advance.

Ensure that support for research activities is provided according to the local Ministry of Health procedures and company procedures.

Engagements with Healthcare Professionals

During business operations, Medison may employ the services of healthcare professionals (HCP) or Government Employees (GE) in certain relevant areas for Medison products.

A lecture or consultancy can be contacted with a request to provide service only in instances in which a legitimate business need has been defined and when these service providers are found to be certified based on their qualifications, expertise and other criteria directly related to the identified need. Payment for the service arrangement with consultants and medical professionals must be at a reasonable cost and correspond with the rate of payment adopted in the market, and only for services actually received.

Within the confines of the contractual arrangement with the service provider, an agreement must be drawn up, validated as acceptable and signed by both parties before the service is provided.

Any travel, hospitality and meals provided in relation to HCPs performance of services must be consistent with relevant company guidelines.

We must always remember that our interactions with HCPs are with the intent to benefit patients. We do not promise, offer, or provide money, gifts, or any items of value to improperly influence or reward the HCPs.

The provision of an incentive to service providers is strictly prohibited. Any consultant or lecturer who openly provides service for Medison must report the business relationship whenever necessary. Payment must only be made following receipt of service in full.

Compliance with Transparency/Disclosure Regulation

There is a growing public expectation that interactions between pharmaceutical companies and HCPs, HCOs and patient organizations should be transparent. Our interactions are managed with openness and transparency to ensure public trust and assurance. Medison is committed to comply with all laws, regulations and industry codes requiring the disclosure of payments and other transfers of value to HCPs, HCOs and patient organizations.

We develop and maintain adequate systems and processes to ensure timely, accurate and complete disclosures.

Marketing and Promotion of Medison's Products

Within the confines of our work with physicians, health care professionals and health institutions, we participate in various activities that include enriching medical knowledge through lectures, presentations, scientific and marketing materials. All materials are designed to ensure effective use of products being marketed by us to improve patient care.

Due to the unique nature of pharmaceutical, medical and healthcare products, there are rules and restrictions in place governing their marketing.



The process for preparing reviewing and approving marketing materials related to the drugs ensures that the Company is operating in a professional and ethical manner.

We ensure that all promotional materials and information we deliver are truthful, accurate, balanced and with relevant safety information, not misleading, supported by scientific evidence and consistent with approved product labeling.

All marketing materials produced must be approved in accordance with the policies, laws and regulations.

Wherever we operate, we promote our products only for the uses for which they have been approved by local regulatory authorities and never engage in any unlawful promotion.

Do not display or distribute marketing materials for products that are not registered and/or approved at the time of publication.

Interactions with the Healthcare Community

During its business operation, Medison will sponsor events or activities in areas relevant to Medison's products or investigational products. Sponsorship involves financing an organization or association in consideration for marketing gain. Medison may also support and organize conferences attended by healthcare professionals whereby their main content is professional and/or scientific. The purpose of these meetings is to exchange highly valuable medical and scientific information.

Granting sponsorship allows Medison to obtain marketing commercial gain in consideration of supporting the meeting or scientific activity. Sponsorship can only be granted to unions and associations and not to individual persons, such as patients or professionals in health care fields and cannot be contingent on Medison's ability to affect the content or any other aspect of the conference.

All marketing and/or scientific materials to be displayed during the meetings must be accurate, balanced, fair and objective. The marketing product must be precisely defined and described for which sponsorship is granted (banner, booth, logo in the conference plans, etc.).

Due diligence must be performed and the purpose of granting the sponsorship must be specified. Actual sponsorship must comply with the terms defined in the sponsorship agreement. The amount of the sponsorship must be of reasonable value and correspond with the standard rates of payment in the market.

Interactions with Patients and Patient Organizations

The ability to interact with patients and patient organizations is essential to achieve our purpose of bringing treatments to patients that improve their quality of life.

All interactions with patients must be respectful and executed in a manner consistent with applicable laws, regulations, industry standards, codes and Medison's values.

Medison can provide financial support to patient organizations for participation in a conference, hospitality, retainer and travel, pursuant to said support complying with local laws and regulation. For this purpose, financial support to patient organizations can be made in the form of a donation or support provided for medical activity, research or for patients. Any support must subject to Medison's approval process and the supplier if necessary. Provision of support must not be conditional on prescriptions or marketing of products that are marketed by Medison. Medison cannot request to be the sole support provider to patients' organizations or significant events.

Grants and Donations

In accordance with the standard procedure, support to an institution, organization or association composed of medical experts or that provide healthcare services may be provided as long as this support is designated for broadening knowledge, increasing awareness or research.

The support must be provided in a legal and ethical manner that guarantees and maintains Medison's image and reliability. The provision of support must not be used as an incentive to prescribe, supply or acquire specific medical products.

Different types of activities that can be supported are educational grants, study grants and patient organization grants. All criteria must be satisfied when there is a request for approval of support for every type of activity. The purpose of the grant must not be the promotion of sale of Medison's products. Support must not be provided as an award for use of the product or to gain support based on use of the product.



Internet and Social Media

At Medison, we have a set of guidelines for the creation and approval of digital content, including websites owned by Medison, email messages, online meetings, content created by users and websites funded by Medison to ensure appropriate behavior when using various social networks, including personal use not related to work. You must act in accordance with the rules of ethics and commitment to maintain confidentiality in the digital arena, including forums, blogs, and social networks. All digital materials and activities must be approved prior to execution.

Social media networks and digital technologies allow users to create and share content, opinions, insights, experiences and points of view. Social media may include text, images, audio, video and other multimedia communication. When engaging in social media activities, adhere to these general principles:

- Do not use discriminatory, harassing, threatening or harmful language in internal or external social media. Every form of communication must be free of any ethnic, religious or gender harassment.
- False, misleading or unfounded statements made by employees on social media and networks is strictly prohibited.
- Do not publish images, clips or other media on any social media channel without the expressed written consent of all of those displayed through this form of communication, and do not post any image or content that infringes the copyright or trademark rights for others.
- Obtain necessary permissions before publishing.
- Report adverse events found on the Internet or social media to the relevant contact person.

Publication of material or information that is confidential and is not owned or licensed by Medison, or for which no written approval was received for its use, is strictly prohibited.

Please take notice of the following:

- Do not upload to the Internet social, business, or personal content that may hint at improper relations with customers and suppliers, such as photos and correspondence that include physicians, medical staff, patient organizations, etc.
- Company employees are prohibited from joining social network groups (Facebook, etc.) of patient associations and from engaging in activity in such groups.
- If it is discovered that an employee published this type of material on a social network or on their personal blog, the employee will be requested to remove it. Medison may take disciplinary actions against employees that do not comply accordingly.

An Effective Training Program

Medison implements a training program for all employees, third party suppliers and temporary employees in accordance with their position, in order to assimilate the Code in the organization and make it an integral part of organizational culture. Every employee undergoes initial and annual training. The training program is based on the level of risk and is adapted to the employee's position, and job description. Training includes increased awareness of applicable laws and regulations, the Code, company policy and procedures in companies represented by Medison.

Inspection by the Ministry of Health and Medison Partners

Medison may undergo and will fully cooperate with inspections and audits conducted by local and the companies whose products we represent. We view external control and audit processes as contributing to our own quality assurance.

During inspection processes, cooperate willingly, courteously, and openly. Do not provide false or misleading information, do not misrepresent information, and do not omit vital information. Be familiar with procedures on responding to requests for information, queries, and other applicable legal demands. Do not respond if you are uncertain. If you do not know the answer, indicate this and commit to providing the correct answer as soon as possible.

Reporting Quality Complaints

Satisfactory handling of quality complaints beyond the clear business importance, is also a regulatory requirement for companies when implementing GDP regulations and GMP practices for medical preparations.

A quality complaint is defined as one that indicates defects in product quality including defects in the package, in printed packaging material and in accompanying accessories, which might affect the product's safety and efficacy, or that might constitute a violation of the terms of product registration.



Examples of quality complaints may involve a change in the appearance of the pharmaceutical product, foreign bodies, defects in packaging, poor syringe function, etc.

Every Medison employee who is informed of a quality complaint will report the complaint to the relevant department. The report should include the majority of known details, whereby the minimum details that must be reported include the name of the preparation and the nature of the complaint. The complainant's details must also be obtained (name and telephone), as well as the preparation batch number.

The responsible pharmacist will continue handling the complaint, contact the complainant and manufacturer until investigative conclusions are drawn and lessons are assimilated in the company.

Reporting adverse events and safety information

Any adverse event or safety information (even with no adverse event) related to use of Medison products must be reported immediately when brought to your attention, even if there does not seem to be a causal connection with use of the product.

An adverse event is an unanticipated and unintentional medical event including progression of an existing medical condition. Safety information is the overall name for the following conditions: information on exposure to the drug during pregnancy, including paternal exposure, exposure to the drug during nursing, intentional or unintentional overdose, information on the inefficacy of the drug or partial / diminished efficacy, information of unexpected efficacy of the drug, drug abuse, erroneous use, use not for the indication, error in drug therapy, occupational exposure to the drug, transmission of infectious material in the drug, drug interaction or interaction with food.

Medison is obligated to act in accordance with the law and collect information about such instances in order to expand our knowledge about the safety of use of our products and in order to protect the health of patients.

All company employees, in any position and at any site, must immediately report every case brought to their attention to the Drug Follow-up (Pharmacovigilance) Department or email (pv@medisonpharma.com).

Please include these details in your report:

- The name of the drug and dosage
- Your name and contact telephone number
- Patient's details (name, age, gender)
- Description of the side effect or safety event

In any case, we maintain full confidentiality of the patient and the reported information.

Every side effect experienced by any person using a product marketed by Medison, even if the side effect is common, 'mild' appears in the preparation brochure, including even if you do not find a link between use of the product and a reaction.

Safety information must also be reported even if not accompanied by adverse events.

If you are informed of adverse event or safety information related to use of the product being marketed by Medison, immediately report it along with the necessary information.

You are also to report adverse events and safety information that came into your knowledge not within the confines of your work, such as by way of family or friends.



PART 4

The Medison Way – Our Corporate Culture

Employees and the Workplace

As Medison employees, we apply the company's values every day in the workplace and strive to foster an atmosphere of trust and mutual respect.

Every Medison employee influences the corporate culture and atmosphere and has a direct effect on the company's success. All employees, in any position and at any level, can contribute to adopting Medison's values in the workplace.

We are all duty bound to operate according to the law and to a high standard of professional conduct, to behave with integrity and respect towards others, to act in accordance with the company's policies and values and to guard Medison's reputation.

We expect all our employees to avoid any action or deed that could potentially harm the company's reputation or cast doubt on its integrity and credibility.

- Act in accordance with company policy, values and the Code.
- Always be honest in your words and actions. Do not act in a manner that may compromise Medison's reputation or the reputation of customers, government agencies, colleagues or any other person or party.
- Act professionally and in strict compliance with regulations applicable to you, while applying accepted procedures in your field of expertise.
- Act responsibly and take necessary steps to protect and preserve company property.
- When representing Medison overseas, be especially stringent in adhering to the company's values, procedures and the Code.

A Safe and Healthy Workplace

Medison is committed to protect the health and safety of all employees. We take all necessary measures to maintain a safe, secure and healthy workplace. Medison ensures compliance with all applicable health and safety laws and internal standards. Medison invests in educating, training and motivating all employees to work in a safe and responsible manner. All of us are duty bound to ensure that working conditions comply with safety requirements and to immediately report any safety problem or potential risk.

Always act safely and cautiously.

- Escort all guests throughout their visits to the company site and always ensure the safety of the visitors .
- Learn how to operate and maintain the equipment you use at work.
- Familiarize yourself with the safety rules at the site, including emergency procedures.
- Immediately report any issues related to safety, health and environmental quality, including unsafe working conditions, accidents and "near accidents", work-related injuries and illnesses, as well as violent or threatening behavior.
- Immediately report any accident that occurred during work to the Human Resources department, including on the way to and from work, even if the accident resulted in only a minor injury. Sometimes accidents that seem minor can have serious consequences later. Reporting every accident ensures that preventive actions can be taken and enables processing work injury compensation from the National Insurance Institute, if eligible.



Protecting the Environment

An integral part of our corporate social responsibility is to conduct our business in an environmentally safe manner through safe treatment of waste and avoiding the use of materials, equipment and work methods that potentially harm the environment. We comply with applicable environmental laws and regulations and help address various environmental challenges.

Make sure that your actions do not cause damage to the environment. Promote work methods that contribute to the conservation of energy and resources, reduce waste and encourage recycling. Use recycled or renewable products whenever possible.

Preventing Discrimination and Sexual Harassment

Medison is committed to fostering a diverse workplace that is tolerant and open, accepting and respecting cultural, personal and religious diversity.

Tolerance towards diverse opinions and ideas makes us stronger, helps us aspire to excellence and enables each of us to contribute our part.

Discrimination or harassment of any type contradicts Medison's policy and values. It compromises our ability to work together as a team, based on trust and mutual respect.

Our commitment to an environment free of harassment and discrimination means that all colleagues, business partners and external stakeholders are treated with courtesy, consideration and professionalism. Inappropriate content sent via email or appearing on posters, calendars, screensavers, photos, caricatures, etc. may be perceived as harassment, as well as offensive references to personal characteristics such as gender, race or religion, unwanted physical contact, as well as physical or verbal violence of any type.

Medison is committed to preventing instances of harassment and violence in the workplace.

- If you experience or come across offensive, threatening or violent behavior, you should report this to your manager. You may also contact Human Resources or the Compliance department.
- Do not initiate or participate in actions and behavior that involve harassment, violence, threats or discrimination or those that may be perceived as such. Do not encourage others to do so, by action or omission.
- If you encounter offensive behavior, do not ignore or condone it by remaining silent. File a report immediately.
- Respond to and report expressions, jokes or language that is inappropriate, offensive or insulting.
- Help to promote equal opportunity and prevention of discrimination.

Terms and conditions of service for employees will comply with local legislation on anti-discrimination and prevention of sexual harassment.

Data Security and Privacy

Information is a valuable asset both from privacy and commercial perspective; hence, Medison expects its employees to fully comply with Medison requirements and applicable laws. All the information that you gather over the course of your work is the property of Medison, and you are responsible for protecting it.

Medison has confidential non-disclosure agreements with various companies that prohibit disclosure of information and requires discretion regarding how to use and handle the information to maintain its confidentiality. Therefore, in some cases you will also be required to protect the confidentiality of information belonging to companies and business partners.

Medison respects the confidentiality of information of third parties.

- You are prohibited from disclosing confidential information outside of Medison without a valid business need, prior to company authorization, and subject to obligations of confidentiality, such as an appropriate written confidentiality agreement in place with the receiving party, as required.
- When handling confidential information of third party, you will have an additional requirement to ensure that its use or disclosure is consistent with all legal and contractual obligations we have with that party.

During the course of business, you may be exposed to personal information of data subjects, including sensitive information. Your main concern should always be to protect the privacy of all personal information in your care – whether it is verbal or recorded, in electronic or paper form.

Personal information refers to information about any individual that in itself, or together with other information, can identify the individual. Different countries have different definitions of personal information and different requirements on how such information should be protected. Examples of data subjects whose personal



information may be collected, used, stored or otherwise handled may include, patients, healthcare professionals, business contacts and Medison employees.

When handling personal information at Medison, you must comply with relevant requirements under applicable laws, regulations, and company policies, including Medison Global Data Privacy Policy.

- Make sure you are familiar with the different types of information used by the company and the levels of confidentiality required for each to know how to handle such information and how to protect it.
- Do not use company information to conduct business that is unrelated to Medison or otherwise not expressly permitted, including, for your own private initiatives or those of third parties.
- Do not provide or disclose information about Medison without obtaining advance approval from the person responsible within the company.
- Protect yourself and Medison by using security measures to protect information such as a password on your computer and do not disclose the password to anyone.
- If you must disclose information about Medison as part of your work, after receiving approval, make sure that the other party signs a non-disclosure agreement in accordance with company policy and take steps to protect the information according to company procedures. In case of doubt, consult with your superior.
- If you were exposed to confidential information from a party outside the company, respect the party's intellectual property rights and confidentiality. Do not use or disclose the information in a manner that violates a contractual or legal obligation or duty.
- Do not discuss Medison confidential information with any person outside the company, including friends and family members, unless you have received advanced approval.
- Respect the privacy of data subjects and their personal information while always take into consideration the relevant laws, regulations, and company policies regarding privacy and data protection.
- Upon termination of your employment at the company, return all property and equipment belonging to the company, including all the information and records you have in printed, electronic or other format.

Information Systems and Devices

As a Medison employee, you will have access to company equipment and systems, such as computers, email, voice mail, messaging systems, communication networks and the Internet. These systems are the property of the company and are intended for work purposes only. This is also true of the records and information stored on them.

- You are to use these tools in a professional and responsible manner.
- You must take into consideration at all times that information may be publicized and read by unintended recipients, including those outside the company.
- Use company electronic devices with outstanding care to prevent them from being stolen, lost or damaged. Do not install unauthorized software on company devices, connect hardware to the company network or otherwise disregard policies and procedures regarding the use of Medison's systems.
- When using company systems, you should be aware that the company monitors its systems in accordance with applicable laws; therefore, you are required not to use company systems and equipment for personal matters.
- Medison reserves the right to access information, provided it is in accordance with local laws and regulations.
- Do not create, display, send or receive inappropriate, offensive, or threatening material on Medison's systems.
- Avoid using company systems and equipment for personal matters.

Protecting Privacy and Personal Information

The security and proper use of Medison's information systems and devices are essential for the success of our business and for preserving the reputation and public trust in Medison. You are committed to use our information systems and devices efficiently, securely and appropriately.

Medison has in place information management policies and procedures to ensure that company records are maintained, stored, destroyed, or otherwise handled in accordance with company needs and in compliance with applicable legal, regulatory and employment requirements. Company records include information collected in any form, created, and maintained as part of conducting our business. These records may be physical or electronic. Ensure that all data is protected appropriately.

In some cases, information about employees, patients and business contacts, which are needed for conducting routine business, are saved in Medison's systems. These include names, addresses, family status, etc. Illegal use of this information or disclosing it to unauthorized parties within or outside the company, may cause personal and business damage. Therefore, you are obligated to protect and manage personal information with discretion and in accordance with applicable laws and regulations and Medison Global Data Privacy Policy.



If, during the course of your work, you were exposed to personal information, you are responsible for protecting it, using it only for legitimate, legal purposes and ensuring that it is shared with authorized parties only. Access personal information only for appropriate business purposes.

Act in accordance with data security guidelines and take all necessary safety precautions to protect personal information and prevent unlawful disclosure, deletion, change, storage, process, or use.

If you suspect that personal information has been disclosed to unauthorized parties or if you become aware of an information security breach or potential breach, report this as soon as possible to the IT and legal departments and to your manager in accordance with the Global Data Privacy Policy.

Contact with the Media

Medison conducts its organizational and marketing communications in accordance with defined policies and procedures. Any announcements, media interviews or responses will be issued exclusively by management or by the company's public relations firm. Reporters and media channels sometimes attempt to establish direct contact with company employees. Only authorized managers or the company's official spokesperson are permitted to speak with the media.

Refer any request for information from the press or financial parties and others to the CEO's office and report any request for information by an external party.

Avoid statements or responses to the press about topics related to the company, even at personal, private events, as they may be interpreted as Medison's official stance.

Summary

Ethical conduct encompasses a wide range of actions, attitudes, words and deeds. All are aimed at creating a positive and productive atmosphere in the workplace and dictate the nature of all contact with external parties - customers, suppliers, decision makers and government officials.

We are confident that the guidelines and rules included in this booklet are not new to you, and in fact, probably already guide you in your work. Use this booklet as a reference whenever you have questions pertaining to ethical conduct issues. If you do not find an answer in the Code, please contact the appropriate parties.

