

**ANTI-CORRUPTION POLICY
CHIMPHARM JSC**

	Name, position	Date	Signature
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1.0 Introduction and purpose

Chimpharm Joint Stock Company (Santo, Member of Polpharma Group) (hereinafter referred to as “**Chimpharm JSC**” or the “**Company**”), as a socially responsible company continuously aiming to meet the highest ethical standards, is committed to conducting all of its business activities with honesty and integrity, avoiding corruption in any form and complying with the applicable anti-corruption legislation.

Chimpharm JSC has zero-tolerance for corruption. It is wholly unacceptable for the Company, employees, or its “Associated Persons” and “Contractors” (as defined herein) to be involved in, or implicated in, any corrupt practices. High standards of ethical behavior and compliance with applicable laws are essential to protecting the reputation and long-term success of the Company’s business. Any incidents of corruption involving, or relating to, the Company would damage its reputation.

With regards to the aforementioned, this Anti-Corruption Policy has been adopted to establish a set of rules to ensure compliance with anti-corruption laws and regulations, as well as to maintain and develop a culture of compliance and ethical behavior within Chimpharm JSC. This Policy is intended to supplement the Polpharma Group Code of Ethics and other Company policies.

This Policy sets minimum standards that must be applied even when they are stricter than local laws or industry regulations. Where local laws or industry regulations impose a higher standard, are stricter than, or override the provisions of this Policy, then the provisions of those laws or industry regulations must be followed.

Managers at all levels play a key role in building an organizational culture in which corruption shall have no opportunity to occur, as it shall always be an unacceptable phenomenon regardless of its form. As leaders, they should serve as a model of behavior in terms of ethical values, and provide clear support in every ethically or legally dubious situation.

2.0 Scope and applicability

This Policy is subject to mandatory observance and application by all employees of Chimpharm JSC and its structural subdivisions (whether permanent or temporary), as well as “Contractors” (where they are under a relevant contractual obligation) and all “Associated Persons” of Chimpharm JSC and their employees (collectively referred to as “**We**” or “**we**” in this Policy).

“Associated Persons” means, for the purposes of this Policy, any individual or legal entity that acts on behalf of Chimpharm JSC (whether under a relevant contract or otherwise), or performs any work or services for or on behalf of Chimpharm JSC in any capacity whatsoever.

“Contractors” means, for the purpose of this Policy, any individual or legal entity who has entered into a civil law agreement with Chimpharm JSC to perform work or provide services.

This Policy contains definitions of such phenomena that are considered by the Company to be corruption, and also specifies in what situations and forms they occur. Furthermore, the Policy provides recommendations on how corruption can be prevented and what a person who witnesses it, or believes that certain actions of others may be corrupt in nature, should do.

3.0 Compliance with applicable laws and consequences of breach

According to the principles enshrined in the Code of Ethics, strict compliance with the applicable legislation must serve as the basis for the Company’s reliability and reputation.

All forms of corruption are contrary not only to the recognized values and principles of the Company, but also to the legislation of the Republic of Kazakhstan and international laws. The legal basis for anti-corruption measures is reflected in the Constitution of the Republic of Kazakhstan, the Code of the Republic of Kazakhstan on Administrative Offences, the Criminal Code of the Republic of Kazakhstan, the Law of the Republic of Kazakhstan “On Counteracting Corruption” No. 410-V dated November 18, 2015, the Law of the Republic of Kazakhstan “On Public Service” No. 416-V dated November 23, 2015¹.

¹The indicated laws and normative acts may change from time to time.

Breaches of the legislation or this Policy may lead to serious negative consequences for the Company and for the individuals involved. Taking this into account, **Chimpharm JSC has a zero-tolerance approach to corruption.**

Employees must at all times comply with this Policy as well as with the applicable laws and regulations. Disciplinary action will be taken for conduct that breaches this Policy or is illegal, including termination of employment for particularly serious breaches in accordance with the applicable labor legislation. In addition, such an employee may also be subject to other measures of liability in accordance with the applicable legislation.

Chimpharm JSC expects its "Contractors" and "Associated Persons" to comply with this Policy, and all relevant laws and regulations, and to act in an ethical manner. It is unacceptable for them to be involved in, or implicated in, any corrupt practices. To this end, anti-corruption provisions should be reflected in agreements with any "Contractor" and "Associated Person", and include termination rights for breach of the applicable anti-corruption legislation, this Policy, as well as the anticorruption provisions of the agreement.

4.0 Key terms and definitions

Throughout this Policy, the following terms should be understood to have the following definitions:

The term "Business Partners" include:

- suppliers of raw materials, products and equipment;
- distributors of the Company's products;
- vendors and individuals who provide work and services for the Company.
- organizations hired by the Company to conduct research;
- partners in the framework of established joint ventures;
- partners under existing licensing agreements;
- potential partners for future joint projects;
- and, other persons and organizations that interact with Chimpharm JSC on a commercial basis, including agencies and any kind of intermediaries (not related to Government Officials).

Company means Chimpharm Joint Stock Company (Santo, Member of Polpharma Group);

Code of Ethics means the Polpharma Group Code of Ethics;

For the purposes of this Policy, the term "**Government Officials**" is broadly defined to include:

- **a person holding a responsible civil service position, i.e.** a person holding a position established by the Constitution of the Republic of Kazakhstan, by constitutional and other laws of the Republic of Kazakhstan for direct execution of public functions and powers of state bodies, including a deputy of the Parliament of the Republic of Kazakhstan, a judge, as well as a person holding a political civil service position or administrative civil service position of corps "A" in accordance with the legislation of the Republic of Kazakhstan on the civil service;
- **an official, i.e.** a person who permanently, temporarily or by special authority who performs the functions of a representative of authorities or performs organizational and management, administrative and economic functions in state bodies, quasi-public entities, local self-government bodies, and also those in the Armed Forces and military bodies of the Republic of Kazakhstan;
- **a person authorized to perform public functions, i.e.** a civil servant, who is, in accordance with the laws of the Republic of Kazakhstan, in the civil service of the Republic of Kazakhstan, holds a position in a state body under the legislation of the Republic of Kazakhstan that is paid from the republican or local budgets or from the funds of the National Bank of Kazakhstan, and exercises the official powers to implement the objectives and functions of the state, **e.g. employees of the Communal State Institution "Healthcare Department of the City of Almaty", employees of the Committee of Pharmacy of the Ministry of Healthcare of the Republic of Kazakhstan, employees of the Committee for Public Health Protection of the Ministry of Healthcare of the Republic of Kazakhstan;** a maslikhat deputy, as well as a person temporarily performing duties required by a civil service position, prior to his/her appointment to such a civil service position;
- **a person equated to persons authorized to perform public functions, i.e.** a person elected to local self-government bodies; a citizen registered as a presidential candidate of the Republic of Kazakhstan, in accordance with the procedure provided for by the law of the Republic of Kazakhstan, members of the Parliament of the Republic of Kazakhstan or deputies of maslikhats, akims of towns of district significance, rural settlements, villages, rural districts and also members of a local self-government elected body; an employee who permanently or temporarily works for a local government body and is paid for his/her work from the state budget of the Republic of Kazakhstan; a person performing administrative functions in a state organization or a quasi-public entity, **e.g. chief doctors of city hospitals, heads of departments at the National Center for the Expertise of Drugs, Medical Devices and Equipment;** employees of the National Bank of the Republic of Kazakhstan and its departments;
- persons or entities acting on behalf of or representing the interests of public authorities, even if such a person is not officially an employee of that body or organization;

- candidates for public position or political office;
- members of political parties;
- officials and employees of foreign government agencies and other foreign institutions;
- and, heads and employees of public international organizations, as well as their specialized agencies and bodies (UN, World Bank, EU, WTO, EURASEC, etc.).

Employees should always consult Legal and Compliance when there is a doubt as to whether an individual is a Government Official.

Legal and Compliance means the Legal and Compliance Division of the Branch of Chimpharm JSC in the city of Almaty;

Material benefits are benefits representing a specific market value. They include things, money (both in the form of cash and bank transfer), including foreign currency, securities, works, services, as well as various valuables, gifts and other property – anything that has value of any kind. They also include the coverage of the cost of educational services, transportation, accommodation in a hotel, and other types of services and works;

MCI means monthly calculation index used for the calculation of benefits and other social payments, as well as the application of penalties, taxes and other payments in accordance with the legislation of the Republic of Kazakhstan. The size of the MCI is annually established under Kazakhstani law;

Non-material benefits have significance to the beneficiary but are difficult to appraise in money. For example, they may involve improvement of the beneficiary's professional situation, like a better salary or higher position, as well as reduction of official duties. Other examples include creating an image or supporting a professional reputation, as well as other forms of lobbying;

Policy means this Anti-Corruption Policy;

Structural subdivisions mean branches and representative offices of Chimpharm JSC on the territory of the Republic of Kazakhstan or abroad.

5.0 The concept of corruption

In accordance with the legislation of the Republic of Kazakhstan, corruption is the illegal use by officials, persons holding a responsible civil service position, persons authorized to perform public functions and persons equated to persons authorized to perform public functions of their official powers (powers of office) and related opportunities to obtain or derive, personally or through intermediaries, material and non-material benefits and advantages for themselves or third parties, **as well as bribery of the said persons through benefits and advantages provided to them.** The benefits in question can be both material and non-material. At the same time, neither the external form nor the value of such benefits is important for the qualification of such actions as a corruption offense.

Generally, corruption means affecting the decisions undertaken by other persons through offering or giving undue benefits. Corruption may expose the Company and the individuals involved to the risk of legal proceedings, fines and jail, and may even jeopardize the Company's reputation.

Corruption can take many forms. In the majority of cases, corruption is associated with the term "bribery" and most often acquires this form. Bribery is the offering or giving of something of value by the giver, so as to improperly influence the action and behavior of the recipient.

5.1 BRIBERY OF GOVERNMENT OFFICIALS

Corruption appears most frequently in the public sector - when someone wishes to affect the decision of a Government official or another person performing a public function. Under Kazakhstani legislation, bribery of Government Officials constitutes a criminal offence, and entails severe sanctions, including imprisonment.

5.2 COMMERCIAL BRIBERY

In addition to bribery of Government Officials, Kazakhstani legislation also specifically prohibits the offering or acceptance of corrupt payments and other advantages between private (non-government) persons and entities.

Corruption in the private sector may take on many forms and manifest in different ways, such as offering undue benefits to a person performing management functions in a commercial or other organization in exchange for acquisition of an order or signing of a favorable contract, or in exchange for making a decision favorable to the Company in the name of some organization (e.g. a decision to refrain from the introduction of a competing product into the market). Under Kazakhstani legislation commercial bribery constitutes a criminal offence and entails severe sanctions, including imprisonment.

6.0 Anti-corruption rules

6.1 IT IS UNACCEPTABLE FOR US TO BE INVOLVED IN, OR IMPLICATED IN, ANY CORRUPT PRACTICES.

In Chimpharm JSC, it is strictly forbidden to commit actions that have any semblance to corruption, or can be perceived as corrupt. We do not have the right to expose ourselves and others to the risks associated with corruption. We also do not have the right to subject the Company to sanctions and fines for corruption offenses, or to risk damaging its reputation.

To this end, we must never solicit, accept, offer, provide or authorize bribes of any kind, or do anything that may be construed as a bribe, either directly or indirectly. We should never perform our duties improperly in anticipation of, or in consequence of, a bribe.

6.2 OUR INTERNAL JUDGEMENT

This Policy may not provide an answer to every issue we may face when performing our duties, but it can help to guide our conduct. When in doubt, we should always ask ourselves:

- Am I comfortable making this decision?
- Is my action/decision in compliance with the main principles laid down in the Code of Ethics and this Anti-Corruption Policy?
- Who does my action/decision affect? And, would they consider it fair to them?

If you are still unsure, you should discuss the issue with your manager or seek guidance from Legal and Compliance.

6.3 PROHIBITION OF CREATING AND USING "CORRUPTION FUNDS"

It is prohibited to engage in setting up so-called "corruption funds", i.e. unrecorded funds, such as a secret cash account, for purposes contrary to this Policy or the applicable legislation.

All accounts, invoices and other documents, as well as records related to dealings with third parties, including suppliers, agents and business contacts, should be prepared and maintained with strict accuracy and completeness reflecting the true nature and extent of transactions and expenses. No accounts shall be kept "off-book" to conceal or facilitate improper payments, and must be ensured through the effective internal control and audit mechanisms that are in place in Chimpharm JSC.

7.0 Interaction with Government officials

Chimpharm JSC continuously interacts with Government Officials in various situations related to the Company's operations. Without such interactions, it would not be possible to register new products and trademarks, or to obtain the permits and certificates that are indispensable in the pharmaceutical industry.

The performance of public functions is linked to a great responsibility, and because of this, very rigorous regulations concerning persons performing public functions have been enacted to ensure objectivity and impartiality.

7.1 NO GOVERNMENT BRIBERY

Chimpharm JSC does not tolerate bribery of any kind. The offering or acceptance of bribes, whether direct or indirect, is unacceptable, unethical and strictly illegal.

We must never offer, promise or give any gift of any size, a payment or other benefit (material or non-material) to Government Officials directly or indirectly (via third parties), to reward or induce improper conduct or influence any decision by Government Officials to our advantage.

It is crucial that we avoid even the appearance of improper interaction with Government Officials.

7.2 NO FACILITATION PAYMENTS

Facilitation payments are unlawful payments of usually small value in order to speed up the performance of a routine action or process such as the issuing of a visa, a permit or customs clearance, among others. Chimpharm JSC considers facilitation payments to be an act of bribery, which is contrary to this Policy. We should not make facilitation payments directly or indirectly via third parties.

7.3 THIRD PARTIES

Kazakhstani legislation prohibits illicit payments to Government Officials made directly by the Company employees or indirectly through an agent, intermediary, consultant, distributor or any other third-party representative acting for or on behalf of the Company (collectively referred to as "**third parties**"). This includes subcontractors or agents hired by third parties to perform work on behalf of the Company.

The Company shall never enter into any relationship with a third party that will interact with Government Officials for or on behalf of the Company, without a prior due diligence check of the third party's background, qualifications and reputation.

7.4 REGULATORY ENGAGEMENT

Regulatory engagement is part of the Company's business. Meetings with Government Officials should take place in a manner that is completely transparent so as to rule out any suspicions as to their nature.

Meetings with high ranking Government officials should not be held one-on-one without the presence of witnesses or observers.

Meetings with the Government Officials should take place in the buildings and offices of government agencies. In the case of meetings with Government Officials outside of the building or office of their relevant institution, care should be taken that the hospitality we offer is not excessive. The nature and value of hospitality must fall within socially acceptable business practices so as not to expose Chimpharm JSC to loss of reputation.

It is prohibited to directly or indirectly seek to influence a Government Official by providing gifts or other material and non-material benefits, as well as any entertainment (including travel and lodging) to them or any associated person, such as a Government Official's family member, friend or associate.

Under certain circumstances, it may be permissible, **with prior approval of Legal and Compliance**, to provide hospitality to a Government Official, including offering reasonably-priced meals, modest travel and lodging, or other entertainment, as a social amenity or business courtesy during product demonstrations or a Government Official's visit to a Company facility, **provided that such hospitality:**

- is consistent with socially acceptable business practices, as well as applicable laws and regulations;
- is not in exchange for any return favor or business advantage from the government;
- cannot be construed as a bribe, or result in embarrassment to the Company in any way;
- was not solicited or demanded by a recipient;
- does not give the appearance of creating an obligation for such a Government official;
- is infrequent, modest, and reasonable;
- and, is documented accurately in the Company's accounting records (please see Section 6.3 Prohibition of "corruption funds").

8.0 Interaction with Business Partners

Initiating and maintaining business relations, as well as searching for new opportunities of development, is the essence of economic activity.

We respect our Business Partners. In relations with them, we always act as a responsible and trustworthy partner. We do not want to expose ourselves or our Business Partners to any legal or reputational risk linked to commercial bribery. Therefore, in relations with Business Partners (not involving Government Officials), we shall strictly adhere to the following rules with respect to offering and accepting benefits and hospitality.

8.1 NO COMMERCIAL BRIBERY OR "KICKBACKS"

We must never offer, promise or give any gift, payment or other benefit (material or non-material) to Business Partners directly or indirectly (via third parties), to reward or induce improper conduct or influence any decision by Business partners to our advantage.

We shall not make or accept "kickbacks" of any kind. "Kickbacks" are typically payments (or other material and non-material benefits) offered to commercial organizations in return for a business favor or advantage, such as a payment made to secure a contract.

8.2 OFFERING ENTERTAINMENT AND GIFTS

It is acceptable to offer business entertainment (e.g. attendance at sports and cultural events) and gifts to Business Partners if it is **lawful, modest, appropriate, reasonable and justifiable** in all the circumstances, and subject to the condition that the value of such an offer is permitted by the applicable laws. Business entertainment and gifts of this type may be given, such as on the occasion of commencing cooperation, business visits, completing an important stage of cooperation, conclusion of a project, and official public holidays, among others. Whether offering business entertainment and gifts is appropriate depends on the type, value, and reason.

Employees should always consult Legal and Compliance when there is a doubt as to whether a proposed business entertainment or gift is lawful, modest, appropriate, reasonable and justifiable.

In any case, we do not conceal the fact that entertainment and gifts were given, nor do we provide entertainment and gifts in a manner that indicates that we wish to conceal such a fact. Transparency in our activities is paramount.

8.3 ACCEPTING ENTERTAINMENT AND GIFTS

We must never solicit, accept, agree to accept or receive any gift, payment or other advantage from Business Partners (directly or indirectly) as a reward or inducement for improper conduct or which influences, or gives the impression that it is intended to influence, decisions of the Company.

We may accept business entertainment (e.g. attendance at sports and cultural events) and gifts from our Business partners, if it is **lawful, modest, appropriate, reasonable and justifiable in all the circumstances**, and subject to condition that the value of such offer does not exceed **2 (two) MCIs**. Business entertainment and gifts of this type can be accepted e.g. on the occasion of commencing cooperation, business visits, completing an important stage of cooperation, conclusion of a project, and official public holidays, among others. Whether acceptance of business entertainment and gifts is appropriate depends on the type, value, and reason.

One must notify Legal and Compliance of any business entertainment and gifts from Business partners of a value above 2 (two) MCIs. Generally, such things should be refused and returned.

Gifts with a value above 2 (two) MCIs can be accepted **only after approval of the Head of the initiating Division and Head of Legal and Compliance** and on the basis that they become the property of the Company.

In any case, we should decline an offer of a gift or entertainment, if acceptance of it could affect our objectivity, induce us to act against the Company's interests, or lead to questions of bias or impropriety.

8.4 When offering or accepting gifts and entertainment, one should consider the following questions:

- 1) Is the intent only to offer acceptable business courtesy, or is it to influence the recipient's objectivity in making a specific business decision?
- 2) Is it modest, appropriate and infrequent?

In all cases, it is prohibited to offer or accept business entertainment or gifts that:

- are prohibited by legislation or by another party's organization;
- are 'quid pro quo' (offered for something in return, e.g. a supplier who offers money to a company employee or representative so as to gain business from that company);
- are actively solicited or demanded by the recipient;
- are cash or its equivalent in any form (checks or other securities, gift cards, and so forth);
- are aimed at obtaining advantageous treatment that would not otherwise be available to the recipient;
- or, are personal services and favors.

All allowable gifts should be presented explicitly and openly, and provided directly from Chimpharm JSC - not from a specific employee.

Be cautious when receiving anything from Business Partners. The same applies when giving anything of value to Business Partners. If you are in doubt as to whether you are at risk of being bribed or at risk of bribing others, then report your concern to your manager or Legal and Compliance.

8.5 HOSPITALITY

It is acceptable to provide hospitality to Business Partners, including offering reasonably-priced meals, modest travel and accommodation, or other entertainment, as a social amenity or business courtesy during meetings concerning current or future cooperation provided that it is in compliance with the applicable legislation. In any case, one must pay attention that our hospitality is not excessive, inappropriate or perceived as having an improper influence

In case of offering accommodation, 4-star hotels are the recommended level; the choice of 5-star hotels is permissible in the absence of places in other hotels of the lower class, in order to ensure safety of participants in the event or other reasonably justified circumstances.

In case of reimbursement of travel expenses, it is recommended to pay for economy class if the flight time is of a duration of less than 5 hours regardless of the number of connection flights. It is recommended to consider business class only when the flight time is of a duration of equal to or greater than 5 hours.

We refrain from acts of hospitality which could be negatively perceived by society, cause a negative reaction by Business partners, or otherwise pose a threat to the reputation of Chimpharm JSC.

If you have concerns about whether an offered hospitality is compliant with this Policy, contact your direct manager or Legal and Compliance.

9.0 Proper use of company assets and resources. Books and records

The use of Company assets and resources (collectively, “**Assets**”) for any unlawful, improper or unethical purpose is prohibited. Protecting Company Assets against any misuse is the responsibility of every employee. Any suspected inappropriate use of Company Assets should be reported to an employee’s supervisor or Legal and Compliance. Assets may only be used for purposes and activities defined in the Company Charter and in compliance with the Code of Ethics and other Company policies and procedures. Transactions with Assets shall be executed with proper authorization of the Company’s authorized bodies and/or officers.

The Company shall make and keep books, records and accounts that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of Company Assets. The Company shall devise and maintain a system of internal accounting controls sufficient to provide reasonable assurances that:

1. transactions are executed in accordance with management’s general or specific authorization;
2. transactions are recorded as necessary to permit preparation of financial statements in conformity with generally accepted accounting principles or any other criteria applicable to such statements, and to maintain accountability for such assets;
3. access to assets is permitted only in accordance with management’s general or specific authorization;
4. and, recorded accountability for assets is compared with existing assets at reasonable intervals, and appropriate action is taken with respect to any differences.

10.0 Reporting violations of the anti-corruption policy

Each Company employee, and any other person to whom this Policy applies, who has witnessed a violation of this Policy or, acting in good faith, believes that the provisions of this Policy have been violated, must immediately inform his/her manager and/or Head of Legal and Compliance. If he/she is unsure whether a particular act or proposed/considered action/inaction would constitute corruption and breach of this Policy, or if there are any other queries related to this Policy, such concerns should also be raised with his/her respective manager and/or the Head of Legal and Compliance.

The Head of Legal and Compliance can be reached by one of the following means:

- by phone at: Tel.: +7 (7252) 61-01-55 Ext. 2555;
- by email to: ethics@santo.kz;
- by regular mail addressed to: Head of Legal and Compliance Department, Almaty Branch of Chimpharm JSC in 17/1, Al-Farabi ave., Nurly Tau PFC, block 5 B, 19th floor, Almaty, Republic of Kazakhstan, 050008
- or, during a personal meeting.

Chimpharm JSC always provides protection to persons reporting violations. The identity of persons who have raised concerns will be kept confidential, and their concerns will be reviewed and investigated objectively and fully. They will also receive feedback on the outcome.

Chimpharm JSC strictly prohibits retaliation for good faith reports of suspected misconduct. The Company does not tolerate the harassment of anyone raising concerns. Such conduct is itself a breach of this Policy, and will be treated as a serious disciplinary matter.

Failure to report a violation of this Policy constitutes an independent violation of this Policy that is subject to discipline, up to and including termination of employment in accordance with the labor legislation of the Republic of Kazakhstan. **Therefore, we should never willfully ignore or ‘turn a blind eye’ to any evidence of corruption or bribery, or fail to report any improper payment or other inducement.**

11.0 Remedial action

When an alleged violation of this Policy is reported in accordance with Section 10 of this Policy, a direct manager shall take prompt and appropriate action, which is consistent with good business practice and applicable

legislation. If the suspected violation appears to involve either a possible violation of legislation or an issue of significant interest to the Company, then the manager should immediately notify the Head of Legal and Compliance. The Head of Legal and Compliance or other representative of the Company's senior management, as applicable, shall assess the situation and determine an appropriate course of action.

If a suspected violation involves any director or any other representative of upper management of the Company, the Head of Legal and Compliance should immediately report the alleged violation to the Compliance Officer of Polpharma Group.

The appropriate disciplinary actions, including termination of employment, may be imposed in accordance with this Policy and other Company policies and applicable legislation for any employee who is found to have violated this Policy. In addition to imposing discipline upon employees involved in non-compliant conduct, the Company may impose discipline, as appropriate, upon an employee's manager, if any, who directs or approves that employee's improper actions, or is aware of those actions but does not act appropriately to correct them.

Where breaches by "Contractors" and/or "Associated persons" of anticorruption laws or this Policy are identified and established, immediate remedial action must be taken. This shall require immediate termination of the relevant contract.

In the event of a violation of the Policy, the Company should assess the situation in order to determine whether the violation demonstrates an issue that requires remedial action as to this Policy and/or other Company policies and procedures. Such remedial action may include retraining Company employees, modifying this Policy and/or other Company policies and procedures, improving monitoring of compliance under existing procedures, and any other action necessary to detect similar non-compliant conduct and prevent it from occurring in the future. Such remedial action shall be documented.

12.0 Entry into force and amendment of the Policy

This Anti-Corruption Policy is an internal act of Chimpharm JSC and shall come into force as of 1 January 2019. Any amendment of this Policy must be approved by the General Director. The Policy will be reviewed and audited from time to time, which requires cooperation from all concerned.

End of document.