



CAEME Code of Ethics

I. Introduction and general framework

Cámara Argentina de Especialidades Medicinales (CAEME) is a non-profit, non-governmental organization created on July 27, 1925. Its main purpose is to foster and achieve the harmonic and solidary defense of the common interests of its members and the development of the pharmaceutical industry in Argentina.

CAEME adheres to and shares the values of care, fairness, honesty and respect established in the Code of Practice of the International Federation of Pharmaceutical Manufacturers and Associations (IFPMA) and it is committed to ethics and legal compliance.

Any activity performed by CAEME or in its name must be conducted in accordance with this Code of Ethics and with its supplementary policies and procedures. Its principles and rules should be known, understood and observed by all parties subject thereto.

Section 1. Purpose

The purpose of this Code of Ethics is to provide the basis to identify ethical duties, avoid forbidden behavior, raise and discuss possible ethical dilemmas, report likely irregular situations and, in general, support the application and development of the CAEME Integrity Program.

Section 2. Definitions

2.1. Political Contributions: Assets, funds or services delivered for the financing or support of a political party structure or an electoral campaign, in any jurisdiction.

2.2. Public Official: The term should be construed in a broad sense and it includes:

- Any executive or employee elected or appointed by a government or a government body, governmental agency or state-owned or partially state-owned company;

- Any executive or employee elected or appointed by international public organizations, such as the United Nations;
- Any person holding an official position, acting for or on behalf of a government or government body, governmental agency or international public organization;
- Politicians and candidates to occupy public offices;
- Any other person considered a public official as per the current sector laws, rules and codes;
- Medical and scientific personnel when working at a hospital, clinic or university, or any other similar public or partially public entity.

2.3. Hospitality: Travel, accommodation, meals and snacks.

2.4. CAEME Members: Member companies of CAEME - as to their participation in any activity of CAEME or on its behalf-, CAEME Staff and members of the Board of Directors of CAEME, while acting as such.

2.5. Healthcare Professionals: Notwithstanding provisions contained in the legal rules in force, any member of the medical, dental, pharmacy or nursing professions, or any other person who, in the course of his or her professional activities, may perform or condition the activities of prescribing, recommending, purchasing, distributing, dispensing or administering a medicinal product.

2.6. Gifts: Gifts, benefits or advantages of any type delivered on a free basis, as courtesy.

2.7. CAEME Staff: Employees, managers and directors of CAEME.

2.8. Bribery: Benefits promised or granted to a Public Official with the purpose of obtaining something in exchange or exercising influence on his/her behavior.

2.9. CAEME Third-Parties: Suppliers, external advisors, consultants, legal representatives, medical associations, health institutions, professional associations and companies in which CAEME has a shareholding or governance power, among other.

Section 3. Scope

This Code of Ethics is applicable to all decisions made and actions taken in the name, on behalf, or for the benefit of CAEME, as well as in the course of any institutional or economic activity in which CAEME participates.

It is mandatory for all CAEME Members and CAEME Third Parties.

II. CAEME Integrity Rules

Section 4. Legal Compliance

At CAEME, observance of legal rules and regulations is considered essential. In case of lack of clarity, doubts as regards construction thereof should be raised and clarified with the support of the Legal Manager and Compliance Officer of CAEME.

Section 5. Absolute Prohibition of any type of Bribery and Corruption

CAEME absolutely prohibits offering, making, promising or consenting the payment of Bribes or the granting of undue benefits of any nature whatsoever to gain an advantage for the Chamber or its members.

Interactions with Public Officials should at all times be conducted with integrity, honesty and transparency, within the scope of and pursuant to the terms established in the CAEME Policy for Interactions with Public Officials, which policy should be consulted in case of doubt.

Section 6. Political Neutrality

CAEME acts with full impartiality as regards political parties and does neither make Political Contributions or political party contributions nor accepts that such contributions are made on its behalf. Any political or political party activity by any of CAEME Members or CAEME Third Parties should be conducted separately from CAEME's activity, ensuring that its interests, neutrality vocation or institutional image are not affected.

Section 7. Honesty in the defense of sectorial interests

CAEME fosters amendments to the legal rules and regulations and adopts and communicates to public stakeholders its institutional stance and proposals as regards bills, regulatory changes and

public policies related to pharmaceutical and biopharmaceutical activity, medical technologies and the healthcare system.

While conducting this activity, it should act in a transparent and objective way, avoiding any undue influence on Public Officials.

Section 8. Transparency in the cooperation with public authorities

CAEME and its Members cooperate with public authorities by submitting initiatives and proposals on issues of general interest for the industry, the medical sphere or the society.

Such cooperation should avoid any type of personal benefit for Public Officials or related third parties.

Section 9. Gifts and Hospitality

At CAEME, any Gift to Public Officials should be avoided, except for those related to basic courtesy and/or provided at CAEME events.

Gifts and Hospitality should be austere and avert any intention to influence the will of the receiver. In case of doubt, please resort, as applicable, to CAEME Policy on Interactions with Public Officials, to the CAEME Code of Good Pharmaceutical Marketing Practices and Interactions with Healthcare Professionals, or consult the Legal Manager and Compliance Officer of CAEME.

Section 10. Free and fair competition

CAEME promotes free market competition, requiring prudence and responsibility in the participation in interaction areas among CAEME member companies and in common interest activities.

Participation in unfair practices is prohibited. In case of doubt, CAEME Policy on Interactions with Public Officials should be consulted.

Section 11. Prevention of money laundering and financing of terrorism

CAEME values the transparency of the financial market and rejects any concealment, undue management or distortion of the true ownership of assets and funds.

Any practice facilitating the granting of a legal or legitimate appearance to assets with possible criminal or illegitimate origin, as well as making contributions or supporting individuals or entities related to the organized crime, is prohibited.

Section 12. Noninterference with medical impartiality

CAEME values independent decision-making by Healthcare Professionals. Interactions with healthcare professionals and with other health stakeholders should maintain high ethical levels in promotional activities and observe legal, regulatory and professional requirements.

Provisions of the CAEME Code of Good Pharmaceutical Marketing Practices and Interactions with Healthcare Professionals should be taken into account and observed. This Code should be consulted in case of dilemma or query.

III. Integrity Rules as regards CAEME

Section 13. Care for CAEME's Resources

CAEME expects a respectful behavior from its Members as regards its interests, assets and rights.

Misappropriation of CAEME's assets or the use thereof for individual or third-party benefit is prohibited.

Section 14. Financial and Legal Good Standing

CAEME keeps a thorough record of its economic and financial activity, submitting its financial records to its member companies and complying with current laws and regulations and good accounting practices.

All CAEME transactions should be clearly and accurately disclosed in its files, records and books. Falsification or alteration thereof is prohibited.

Section 15. Confidential Information Protection

CAEME promotes respect for medical professional, commercial, industrial or similar secrets and values protection of information as a strategic asset.

CAEME requires protection and confidential treatment of information which, due to its nature, should remain secret, information declared confidential by decision of its authorities or the dissemination of which may harm its interests. Appropriation thereof, use of such information for individual benefit or sharing it with third-parties without prior authorization, is prohibited.

Section 16. Due Diligence in Relationships with CAEME Third Parties

Due diligence should be conducted in the relationships with CAEME Third Parties, being aware of their essential features and the rationality and sense of their relationship with CAEME.

Any factor raising doubts as to the third-party integrity, reputation, solvency, and suitability should be consulted with the Legal Manager and Compliance Officer of CAEME. CAEME Staff and the members of its Board of Directors must comply with the Policy on Due Diligence in Interactions with CAEME Third Parties.

Section 17. Conflicts of Interest

When the personal interest of a CAEME Member or CAEME Third Party interferes or may interfere with the objective compliance of its duties on behalf, for the benefit or in the interest of CAEME, altering its objective or impartial behavior - or the mere appearance - that such interest could prevail over those of CAEME, such situation must be disclosed and the person should refrain from participating in the decision-making process.

When such actual, potential or apparent conflict of interest occurs, the Legal Manager and Compliance Officer of CAEME should be summoned to intervene. This Officer will provide advice on the best way to deal with, record and handle the abstention from the decision-making process on such conflict of interest, including the alternatives so that the situation is correctly documented and the decision-making process may continue with no delays or interferences.

Section 18. Reception of Gifts and Hospitality

CAEME allows Gifts to its Staff, provided they do not exceed, individually, the amount of USD 60 (United States Dollars sixty) or the equivalent amount in Argentine Pesos at the official exchange rate.

Any Hospitality intended to exercise an influence on the receiver or that carries an implied consideration to do or not to do a certain thing within the framework of tasks conducted at CAEME or on its behalf, is prohibited.

Section 19. Moderate privacy expectation

CAEME provides communication devices, networks and systems, in order to deliver tools for the execution of tasks on its behalf or for its benefit. Such media are the property of CAEME and are allocated to labor or professional purposes.

Use thereof for particular purposes should be restricted to what is essential and, it should also be considered that, in this respect, there is reduced private use expectation, as CAEME reserves its right to control such use under current laws and regulations.

Reduced privacy expectation includes (yet it is not limited to):

- Office furniture and cabinets interior
- Job email
- Shared folders
- Access to SICAEME system or to any other similar one
- Devices such as *smartphones, tablets, notebooks*, PCs, or similar items provided by CAEME or admitted by CAEME to be used in labor tasks
- Internet use history on the previously mentioned devices
- Security cameras audio and video recordings
- Any other that CAEME might indicate in its policies on information technologies

IV. Code Application

Section 20. Communication and Training

The Code of Ethics will be adequately communicated to CAEME Members and CAEME Third Parties. It is expected that they cooperate in the transmission of its contents as well as in the discussion and improvement thereof.

CAEME Members and CAEME Third Parties should punctually attend training on integrity, at which training doubts, dilemmas and improvement proposals to these policies should be raised.

Section 21. Mandatory Reporting

Any consultation on the interpretation of this Code should be addressed to the Legal Manager and Compliance Officer of CAEME. Any infringement of the Code of Ethics should be reported through the CAEME Ethics Line, the secure and confidential channel that CAEME puts at the disposal of any party willing to make complaints and consultations.

CAEME will not tolerate any kind of pressure or retaliation towards the complainant and/or towards those making consultations or cooperating with an internal investigation. Such behavior will be considered an extremely serious fault and will enable the application of penalties.

Section 22.

The content of this Section is applicable to CAEME Members and CAEME Third Parties and has been omitted in the released version for communication to public stakeholders.

Section 23. Person responsible for Integrity

The Legal Manager of CAEME acts as Compliance Officer and is also the internal application authority of this Code of Ethics as well as the person in charge of the CAEME Ethics Line management.

He is authorized to:

- Conduct the CAEME Integrity Program, its monitoring and enhancement.
- Provide general advice on this Code of Ethics and on the other policies and procedures of the CAEME Integrity Program.
- Report to the Executive Director and to the Board of Directors of CAEME on the progress of the CAEME Integrity Program.
- Manage the complaints system and handle the reports and consultations received through the CAEME Ethics Line.
- Adopt the necessary actions to assure the protection of the identity of complainants and denounced persons, the confidentiality of the reported information and the safeguard of complainants against retaliation.
- Conduct internal investigations due to relevant reports or other events of interest and submit the outcome to the consideration of the Executive Director and of the Board of Directors of CAEME, proposing courses of action to be adopted.

The general supervision on the progress of the CAEME Integrity Program is in charge of the Board of Directors of CAEME.

Section 24. Penalties

Infringement of this Code of Ethics will be subject to penalties according to the seriousness of the infringement and pursuant to current laws and regulations, and may also have civil and criminal consequences.

Section 25. Entry into force

This Code of Ethics will enter into force as from the business day following the day of approval by the Board of Directors of CAEME. The same rule will be applicable to revisions, amendments or updating thereto.

Supplementary Regulatory References

This Code of Ethics is supplemented by:

- CAEME By-Laws and the amendments thereto
- CAEME Policy on Interactions with Public Officials.
- Policy on Due Diligence in Interactions with CAEME Third Parties
- CAEME Code on Good Pharmaceutical Marketing Practices and Interactions with Healthcare Professionals
- Regulations for the reception, investigation and settlement of complaints received pursuant to the Code of Good Pharmaceutical Marketing Practices and Interactions with Healthcare Professionals of CAEME
- Procedure for the Management of Complaints and Consultations through the CAEME Ethics Line