



CAEME Policy on Interactions with Public Officials

I. Introduction and general framework

Through this policy, CAEME sets the rules and specific procedures to prevent illegal actions within the sphere of bidding procedures, administrative agreements or in any other interaction with the public sector.

CAEME interacts - either directly or through CAEME Third Parties - with members of the National Public Administration and with the administration of the various provinces and municipalities of Argentina, as well as with congress members of the legislative branch and other members of the public sector.

In such interactions, CAEME promotes ethical behavior and requires the observance of the law, of its Code of Ethics and of this policy, seeking to evidence its full commitment towards integrity and transparency in institutional and business interactions.

Section 1. Purpose

The purpose of this policy is to set the basis for an honest interaction with the public sector and to provide guidance so that any party interacting with Public Officials while performing tasks for CAEME or on its behalf, does so with ethics and transparency, avoiding any behavior that might be construed as an attempt to unduly benefit a Public Official, inappropriately exercise an influence on such official or obtain any type of improper advantage.

Section 2. Definitions

2.1. Cooperation with Authorities: CAEME's activity with government authorities in which it submits projects, initiatives and proposals on issues of general interest for the industry, the medical sphere or the society.

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

2.3. 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.

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

2.5. 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.

2.6. Interactions with Public Officials: Oral conversations, written exchanges or exchanges through any other channel, meetings or any other situation at which issues of interest for CAEME are dealt with or discussed, and the counterparty of which are Public Officials.

2.7. Facilitating Payments: Payments to Public Officials in order to accelerate routine public actions or formalities, such as authorizations, visas, permits, customs formalities, etc.

2.8. 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.

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

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

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

2.12. 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.

This policy is not applicable to interactions with Healthcare Professionals and other health system stakeholders or other groups of interest, which are governed by the CAEME Code of Good Pharmaceutical Marketing Practices and Interactions with Healthcare Professionals.

II. Prohibitions

Section 4. Zero Tolerance for Bribery and Corruption

CAEME does not tolerate Bribery or corruption, whatever their form or nature. The following is absolutely prohibited:

4.1. Offer, promise or give any kind of undue benefits to Public Officials in the name, interest or for the benefit of CAEME. In the event of requests and/or demands of this nature by Public Officials, a clear negative response should be provided and this situation should be immediately reported to the Legal Manager and Compliance Officer of CAEME.

4.2. Exercise influence with the purpose of gaining inappropriate advantage in the issue of public regulations, policies, decisions or projects.

4.3. Any type of transmission to a third party of an undue request made by a Public Official, or to a Public Official of an undue offering by a third party.

4.4. Offer, give or promise undue benefits of any nature whatsoever to any person so that it may exercise its influence on a Public Official.

4.5. Foster, make or participate in Facilitating Payments.

4.6. Any other type of behavior not expressly stated in this section which, pursuant to common sense and good faith, has a similar unethical value.

Section 5. Inadmissibility of Anticompetitive Practices

CAEME admits no practices contrary to free market competition. Among other, the following is prohibited:

5.1. Promote, enter into or participate in agreements to fix prices or market shares.

5.2. Participate or promote bid rigging in any way or simulate competition in the context of bids.

5.3. Promote, perform or participate in abuse of dominant position.

5.4. Interfere with the independent criterion of member companies in commercial or productive decision-making.

5.5. Foster, perform or participate in any boycott, discriminatory or deliberate harmful action against a competitor.

Section 6. Political Contributions Prohibited

CAEME maintains full political and party neutrality. The following is prohibited:

6.1. Make campaign contributions or contributions to support political parties in the name, interest or for the benefit of CAEME.

6.2. Encourage third parties to make campaign contributions or contributions to a political party involving in any way whatsoever CAEME's name or image.

In those cases in which a CAEME Member or CAEME Third Party chooses to act as previously indicated in a strictly personal way, such Member or Third Party should be aware that this behavior is tolerated but not promoted by CAEME, that it is individually responsible for such behavior, and that it undertakes to act in a completely separate way from its role in the Chamber, assuring that the interests, neutrality vocation or institutional image of CAEME are not affected thereby.

III. Good Practices

Section 7. Amendment proposals to legal rules and regulations

CAEME's activity to foster amendments to legal rules and regulations and to adopt and communicate to public stakeholders its institutional stance and proposals for bills and regulatory changes should be conducted in a transparent way and avoiding any type of undue influence, for which purpose the following guidelines should be observed:

7.1. Avoid the offering of any advantage to Public Officials playing a counterparty role in the proposals and presentations made by CAEME.

7.2. In order to communicate CAEME's institutional position, CAEME authorizes the participation of CAEME Third Parties sufficiently qualified on the issue discussed, acting under the supervision of a director or manager of CAEME.

7.3. CAEME's institutional position should be transmitted through reasonable and customary media for public debate such as press releases, full-page paid announcements, position papers, institutional notes or emails, meetings at the offices of public officials, papers in conferences and congress commissions, press campaigns and/or campaigns in social networks, among others.

Section 8. Cooperation with Government Authorities

Cooperation with Authorities should be conducted with integrity, for which purpose the following guidelines will be observed:

8.1. Transparency of the institutional relationship should be assured, being all parties involved fully aware of the existence of any economic resource transferred by CAEME for such purpose. In such circumstances, CAEME will maintain control on the decisions as to how and to whom such resources will be allocated, and it will not accept any interference by Public Officials.

8.2. Any personal benefit for the Public Officials composing the agency or entity receiving the cooperation, should be avoided.

8.3. Except in the case of highly-reputed social welfare organizations, the participation of non-governmental intermediaries selected by the agency or institution receiving the cooperation will not be admitted. Intermediaries selected by CAEME will act due to an institutional need and should be sufficiently qualified.

8.4. For any aspect not included in this policy, provisions of Section 5.3 "Gifts and Grants" of the CAEME Code of Good Pharmaceutical Marketing Practices and Interactions with Healthcare Professionals will be applied in a subsidiary manner.

Section 9. Gifts and Hospitality

At CAEME, Gifts and Hospitality to Public Officials should always be moderate and austere, related to basic courtesy and/or to events organized by CAEME. When making such gifts or

providing such hospitality, context should be taken into account and the following guidelines observed:

9.1. Avoid anything that might have a sumptuous, luxurious or excessive nature.

9.2. Avoid anything that might have an undue influence on the actions of the Public Official or be interpreted by him/her as a consideration or acknowledgment for an action already performed or to be performed in the future.

9.3. In case of gifts to Public Officials of public institutions with which CAEME has entered into supply agreements or exercising controlling, regulatory or supervisory functions with respect to CAEME or its member companies, they will be considered with a restrictive nature and should only be made upon prior consultation with the Legal Manager and Compliance Officer of CAEME.

Section 10. General Guidelines for Interactions with Public Officials

Whenever possible and within what is considered standard, customary and reasonable in the context of institutional relationships, in their interactions with Public Officials, CAEME Members will observe the following guidelines:

10.1. Meetings with Public Officials will be preferably held in public and/or official offices or premises.

10.2. When the meeting is held at CAEME, it should be previously scheduled and should be conducted in designated meeting rooms.

10.3. Whenever possible and provided this does not cause a logistic or bureaucratic hindrance, more than one CAEME Member should attend the meeting.

10.4. Maximum diligence should be applied to accurately and promptly communicate any doubtful, unusual or illegal behavior by a Public Official to the Legal Manager and Compliance Officer of CAEME after the meeting ends.

IV. Policy Application

Section 11.

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 12. Penalties

Infringement of this policy 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 13. Entry into force

This policy 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 Policy is supplemented by:

- CAEME Code of Ethics
- CAEME Code of Good Pharmaceutical Marketing Practices and Interactions with Healthcare Professionals.
- Policy on Due Diligence in Interactions with CAEME Third Parties
- Procedure for the Management of Complaints and Consultations through the CAEME Ethics Line