

East Midlands Pharma Business Ethics Statement

Introduction

East Midlands Pharma values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the firm's staff as well as others acting on the firm's behalf are key to maintaining these standards.

The purpose of this document is to set out the firm's policy in relation to bribery, corruption and business ethics. The policy applies strictly to all employees, directors, agents, consultants, contractors and to any other people or bodies associated with the EM Pharma group of companies, within all regions, areas and functions.

Understanding and recognising bribery and corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

Policy

EM Pharma will not tolerate bribery or corruption in any form.

The firm prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- *to or from* any person or company wherever located, whether a public official or public body, or a private person or company;
- *by* any individual employee, director, agent, consultant, contractor or other person or body acting on the firm's behalf;
- *In order to* gain any commercial, contractual, or regulatory advantage for the firm in any way which is unethical or *to* gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

The firm will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

Key risk areas

Bribery

Bribery can be a risk in many areas of the firm. The key areas to be aware of in particular are:

- Excessive gifts, entertainment and hospitality
- Facilitation payments
- Reciprocal agreements
- Actions by third parties for which the firm may be held responsible
- Record keeping

Tax Evasion

East Midlands Pharma strictly prohibits any form of tax evasion and is committed to full compliance with all applicable tax laws and regulations.

Accurate Reporting: All financial records must be accurate and complete, reflecting the true nature of transactions.

Transparency: We maintain transparency in all dealings with tax authorities and do not engage in practices designed to evade taxes.

Training: Employees involved in financial reporting and tax-related matters will receive regular training on tax compliance.

Political Interest

East Midlands Pharma respects the political process and maintains a neutral stance in political matters.

Political Contributions: The company does not make direct or indirect political contributions, including donations to political parties or candidates.

Personal Activities: Employees are free to participate in political activities in their personal capacity, provided these do not conflict with their duties or imply company endorsement.

Lobbying: Any lobbying activities undertaken by the company will comply with all relevant laws and regulations, ensuring transparency and integrity.

Anti-Competitive Practices

East Midlands Pharma is committed to fair competition and prohibits any anti-competitive behaviour.

Fair Dealing: We compete fairly and do not engage in practices such as price fixing, market allocation, or bid rigging.

Monitoring: Regular audits and training will be conducted to ensure compliance with competition laws and internal policies.

Extortion

East Midlands Pharma has a zero-tolerance policy towards extortion and any form of coercion or threats.

Prohibition: Employees must not use their position to extort money, favours, or other benefits from individuals or organisations.

Reporting: Any instance of extortion must be reported immediately to the compliance department or through the anonymous whistleblower process.

Investigation: All reports of extortion will be thoroughly investigated, and appropriate disciplinary action will be taken against those involved.

Money Laundering

East Midlands Pharma is committed to preventing money laundering and ensuring that its operations are not used to facilitate such activities.

Due Diligence: We conduct thorough due diligence on all third parties, including customers, suppliers, and partners, to prevent money laundering.

Reporting: Suspicious transactions or activities must be reported to the compliance department for further investigation.

Employee responsibility and how to raise a concern

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the firm. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this to your immediate Manager or Director of the company.

Implementation and Compliance

Leadership Commitment: Senior management is responsible for promoting and ensuring adherence to this policy throughout the organisation.

Monitoring and Auditing: Regular audits and monitoring will be carried out to ensure compliance with this policy.

Disciplinary Actions: Any employee found to be in violation of this policy will face disciplinary action, which may include termination of employment and legal action.