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THE HOLISTIC CHOICE

ANTI-CORRUPTION POLICY

I GENERAL PROVISIONS

Anti-corruption policy

PHARMA-MAAC d.o.o. Sarajevo has zero tolerance for bribery and corruption, without exception.

Principles of Anti-Corruption Policy

It is FORBIDDEN to: promise, offer, pay, give or approve the giving of any benefits such as: money, gifts, charitable contributions, hospitality, meals, travel, discounts, goods, services, employment for relatives, confidential information and other forms of bribery).

THE FORM OF BRIBERY IS: direct or indirect (through a third party).

BRIBERY IS ADDRESSED: to any civil servant or any other person / person (whether a civil servant or not).

INTENTION OF BRIBERY: inappropriate influence on the outcome of business decisions or incitement to improper / illegal conduct.

PURPOSE OF BRIBE: gaining an undue business advantage in obtaining or retaining a job.

Key definitions

Business partner: any private or legal person with whom the Company has contact or someone who is likely to have significant contact with a public official while working for the benefit of the Company. In the context of this Policy, other companies within the PHARMA-MAAC Group and their employees are not considered business partners.

PHARMA-MAAC d.o.o. Sarajevo: legal entity with all its business units.

Anti-corruption policy: anti-bribery and corruption policy approved by the owner of the Company and the director of the Company, revised if deemed necessary with the approval of the director of the Company.

Civil servant: an appointed or elected civil servant, civil servant, employee or person acting on behalf of:

- national / provincial / local authorities;
- a state-owned or state-controlled company;
- public international organizations;
- political parties;

Third party: any natural or legal person engaged by the Company who is expected to interact with civil servants on behalf of the Company. Examples include, but are not limited to: agents, intermediaries, advisors, consultants, representatives, lawyers, accountants.

Intermediary: any private or legal person providing the Company with any of the following services: promoting the Company's interests in relation to a specific agreement or project, facilitating the signing and/or execution of contracts with third parties, cooperating with one or more parties to promote or achieve business agreement.

Gifts: money and cash equivalents, things regardless of their value, rights and services given and received without compensation or consideration.

Business hospitality: business hospitality and professional travel grants for health professionals.

Business entertaining: business conditioned hospitality of civil servants, health workers or business partners in the form of meals, drinks, receptions and socializing/events.





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Professional trips of health workers: grants for professional training of health workers in the form of registration fees, accommodation, transportation, etc., related to the trips of health workers to professional medical congresses in the country and abroad.

The goal of the Policy

This Policy supports the commitment of companies within the PHARMA-MAAC Group: PHARMA-MAAC d.o.o. Sarajevo, PHARMA-MAAC d.o.o. Zagreb and PHARMA-MAAC d.o.o. Belgrade, and all its affiliated companies in accordance with the highest ethical standards and legal requirements. The Policy applies to all employees of companies within the PHARMA-MAAC Group and all its affiliates, directors, employees, business owners, executives and all third parties who indirectly assist or operate on behalf of PHARMA-MAAC d.o.o. Sarajevo (hereinafter: the Company).

For the purposes of this Policy, the affiliate has the meaning of any legal entity that is majority owned or controlled, directly or indirectly, by PHARMA-MAAC d.o.o. Sarajevo or its affiliates in any country.

Prevention, detection and reporting of bribery and other forms of corruption are the responsibility of every employee of the Company.

Trust

Employees of the Company perform their duties in a professional, ethical and responsible manner.

Performing the tasks of their workplace and based on a strong belief in fair and honest business, employees of the Company must behave professionally and ethically, bearing personal responsibility when applying the rules and policies of the Company. Employees of the Company respect and demand compliance with the provisions of the Policy, for this purpose they are familiarised with the provisions of the Policy and apply adequate mechanisms that guarantee its implementation. Employees of the Company never undertake activities that have elements of dishonesty, fraud, delusion, misrepresentation or discrimination.

Anti-corruption

The Company's employees do not offer or accept gifts from/to private individuals or organizations with which they wish to establish a business relationship. When giving gifts of symbolic value, the Company's employees must take into account whether the custom or time when such gifts are given can create an image of inappropriate behavior. Certain employees may be restricted from giving or receiving gifts due to their position in the Company, upon notification by the Management Board.

Achieving Company Policy

Employees of the Company perform their duties in accordance with the vision, mission and policy of the Company.





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Personal responsibility

Employees of the Company are personally and individually responsible for the validity of all collected data, performed analyzes or developed plans. Employees of the Company understand that they are responsible for the consequences of their activities, whether good or bad.

Training on this Policy is a standard process for hiring new employees, and training will be repeated as needed.

Avoiding conflicts of interest with the Company

When acting in the name and on behalf of the Company, employees put personal interests second to those of the company. They never use company property for personal gain. Employees of the Company examine all their relationships or actions, which could legitimately be interpreted as a conflict of interest. Employees of the Company must inform the Management Board about the provision of services, participation or employment in the capacity of director, guardian, employee or in another capacity (paid, unpaid, elected, appointed, etc.) with any business entity other than PHARMA MAAC, or any charity, civil, religious, political or educational organization that could be related to the Company's business, especially in relation to any client of the Company, a superior or any related person. Such action requires the written approval of the Management Board.

Fair treatment

Employees of the Company choose their subcontractors and subordinates in accordance with the principles of merit and competence, always seeking only to satisfy the interests of the Company.

Employees of the Company always act in accordance with the usual principles of fair business, especially when they are difficult to apply.

II PROHIBITIONS

The Company specifically prohibits employees and business partners from:

- Offering, promising, giving, paying and authorizing someone to offer, promise or pay, directly or indirectly, an economic advantage or any other benefit for the benefit of a public official or a third party (active bribery), or
- Accepting a request or authorizing someone to accept a request related to an economic advantage or any other benefit from a public official or a third party (passive bribe).

Bribery and corruption can be committed through various activities (monetary and non-monetary). Normal daily social activities may also, in some cases, include behavior related to bribery and corruption that is contrary to the provisions of this Policy.

These prohibitions are not limited to cash payments, with the exception of basic decency activities, they may include inappropriate giving or receiving:





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- Gifts,
- Business hospitality,

THE Rewards (accommodation, meals, transport, educational opportunities or programs, discounts or personal loans),

- Commercial agreements,
- Jobs or investment opportunities,
- Confidential information that can be used to make financial investments,
- Facilitation of payment,
- Family support,
- Other benefits and advantages.

Gifts, economic benefits and other benefits can only be made if they are considered business courtesy and in a situation where they do not compromise the integrity and/or reputation of all parties involved.

These business courtesy activities will not be considered, by the neutral party, as a means of seeking gratitude or maintaining inappropriate benefits.

Gifts and business hospitality must be:

- in accordance with all relevant laws and regulations and internal acts of the Company;
- in accordance with the business interests of the Company;
- in accordance with normal business practice;
- within local or industry standards;
- may not be given in cash or cash equivalents, regardless of the amount or recipient;
- they must not be regular;
- must be given and accepted without expectation of reciprocity;
- must be recorded accurately and transparently, and be supported by prescribed documentation.

The implementation of the procedure for approving the cost of gifts and hospitality is carried out in accordance with the internal acts of the Company.

Employees may not use personal funds or a third party to circumvent the requirements set forth in this Policy.

III RELATIONSHIP OF THE COMPANY WITH BUSINESS PARTNERS

A bond of trust

Any activity that the Company undertakes towards business partners will be fair, ethical, professional and responsible, without exception. We approach our largest and smallest clients in the same way. We meet all our potential and existing business partners so that everyone gets fair treatment - the whole process is transparent.

Transparent and without restrictions

The Company selects only those business partners whose business respects human dignity, is not in conflict with the law and does not endanger the Company's reputation. We actively maintain open, ethical and permissible relationships with our principals. We do not support any activities undertaken or promoted by our principals that could affect the rules of free and transparent competition.





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Joint partnership

The Company understands and applies the values and business principles of our business partners (principals), seeking activities and solutions that best suit their goals and requirements. At the same time, we do not do business and do not continue to do business with principals who do not understand or accept our values and policies.

Sustainable choice

The Company selects principals based on the fact that their products and services correspond to the mission and vision of the Company.

Accurate documentation

All business with principals is documented by appropriate written contracts. Daily transactions, correspondence and communication are systematically archived.

The Company requires regular implementation of appropriate internal accounting controls, and employees are expected to record fairly, accurately, reasonably and in detail all transactions in the Company's books and records. Business books and records must not contain any false or misleading statements or entries, and transactions must never be misclassified with respect to accounts, departments or accounting periods.

Access to this documentation may be restricted by order of the Administration.

Basic integrity

The Company's suppliers must operate in accordance with all applicable laws and regulations, and must conduct its business activities in a fair and ethical manner. Suppliers must not be tolerant of any form of bribery or corruption.

Fair treatment

The Company does not discriminate against suppliers based on race, color, religion, nationality, citizenship, age, disability, gender, sexual orientation or any other factors prohibited by law. The company selects suppliers only on the basis of service, price, quality and desirability of their products and services.

Transparent requirements

The Company's procurement decisions reflect the best assessment of technology, quality, responsibilities, delivery capabilities, costs and performance of suppliers. The Company resolutely avoids the existence of conflicts of interest that may arise as a result of business gifts from suppliers - including strong personal ties between the supplier's representatives and the Company's representatives.

Acting in accordance with laws and rules

The company always and without exception acts according to laws and rules, especially in cases when it is difficult or when it would gain an advantage as a result.





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Free competition

The company strives for competitive advantage through superior quality, service, marketing, research and execution, and never through unethical and questionable business conduct. The Company avoids any contact with competitors that could make the appearance of inappropriate contracts or agreements.

Mutual respect

The company respects the rights of competitors and always treats them fairly in the market.

IV DONATIONS

As a socially responsible legal entity, the company donates part of its earnings for humanitarian, cultural, educational and other general useful purposes, bearing in mind social responsibility, moral principles and principles of professional ethics for which it stands as a society.

Donations are made without any past, present or future obligation of the donor to the Company as a donor, or the explicit or implicit intent to acquire or maintain a business relationship between the donor and the recipient and/or the donor and any employee, Article, persons duly appointed to conduct the activities of the recipient of the donation or to perform any activities that are directly or indirectly related to the activities of the recipient of the donation or to achieve any business advantage for the donor.

Decisions on donations are made in accordance with the provisions of the normative acts of the Company.

V FINAL PROVISIONS

Misdemeanor warnings

Employees of the Company may not be dismissed, professionally demoted, suspended, burdened or discriminated against at work if they refuse to perform activities that would violate the principles set forth in this Policy.

Prior warning:

- Employees of the Company who violate this Policy will be subject to appropriate disciplinary action, with possible termination of employment, as well as possible legal lawsuits necessary to protect the interests and reputation of the Company;
- Business partners who violate this Policy will be subject to appropriate action, including suspension or termination of the contract, removal from the list of approved suppliers and a ban on doing business with the Company and possible claims for damages.

Any actual or potential activity that may involve behavior related to bribery and corruption will be communicated to the superior manager according to the Organizational Structure of the Company.

