

7. Compliance

7.1. Protection of Dignity of the Person

Our company values the dignity and worth of every person and respects their diversity of backgrounds, experiences, and perspectives. We do not tolerate any form of discrimination, harassment, bullying, or violence that violates the dignity of our employees, clients, partners, or stakeholders. This chapter defines our policy on the protection of dignity and the procedures for reporting and resolving any incidents. Dignity is the inherent right of every person to be treated with respect and fairness, and to have their physical, psychological, and emotional well-being protected. Dignity also includes the recognition and appreciation of the diversity and uniqueness of each person, and the promotion of an inclusive culture that values their contributions and perspectives. Our company is committed to protecting the dignity of every person and creating a work environment and a service delivery that is free from any form of discrimination, harassment, bullying, or violence. We expect all our employees, clients, partners, and stakeholders to uphold this commitment and abide by the relevant laws and regulations in the countries where we operate. We also expect them to treat each other with courtesy, civility, and professionalism, and to foster a culture of mutual respect and collaboration. admedicum will refuse business if these principles are compromised, or if there is reasonable doubt that they may be compromised during the course of this business. Money must never determine our professional services to the detriment of our ethical principles. This policy applies to all our Personnel regardless of their position, role, or location, as well as to our clients, partners, and stakeholders who interact with us or use our services. This policy covers any conduct or behaviour that occurs in the course of our work activities, whether on our premises, at external locations, online, or through any other means of communication. This policy also applies to any conduct or behaviour that occurs outside of our work activities, but has a direct or indirect impact on our work environment or our reputation.

7.2. Confidentiality

All personnel of admedicum must at all times keep business secrets confidential. In particular, they will actively support the following policy of admedicum:

admedicum shall keep, and shall cause its personnel to keep, strictly confidential, not disclose to any third party and not use, nor permit its personnel to use, for any other purpose except performance of contracted services any confidential or proprietary information of clients, whether disclosed in oral, graphic, written or any other form, disclosed to admedicum by or on behalf of a client, learned by admedicum or its personnel or developed by admedicum on behalf of the client and any information of any third parties for which the client has an obligation of confidentiality ("Confidential Information"), which includes, without limitation, the terms and conditions of any agreements with the client. admedicum shall disclose Confidential Information to personnel on a need to know basis only solely for the purpose of fulfilling admedicum's obligations towards the client provided, such personnel are bound by a written agreement of confidentiality and non-use restrictions. All employees are bound by working contract, free lance expert partners are bound by mutual Confidentiality Disclosure Agreements (CDA) and admedicum's owners are bound by the statutes of the company. admedicum shall exercise all reasonable efforts to prevent unauthorized third parties from gaining access to Confidential Information (and in no event less than reasonable care). Personnel of admedicum shall promptly notify a member of the Leadership Team of any breach of confidentiality, a person becomes aware.

The Leadership Team will immediately take all actions required to stop any further data leakages, investigate into the background, inform the client and take all necessary actions including but not limited to: notification of the police, technical measures, disciplinary action and any legal actions deemed necessary to mitigate damage and obtain compensation for it.

All personnel should be made aware of the fact that confidentiality towards admedicum and towards any client of admedicum does not end if the working contract and/or the business relationship with

the client has terminated. The confidentiality obligations survive these contracts and personnel found liable of breaching confidentiality at any future time may be subject to prosecution and may be sued for damages.

The foregoing obligations to not apply if admedicum can demonstrate: (i) at the time of disclosure of Confidential Information, is known publicly or thereafter becomes known publicly through no fault of admedicum or its Personnel, (ii) was in admedicum's possession without restriction on disclosure and reduced to writing prior to the time of disclosure by or on behalf of client, (iii) becomes available to admedicum without restriction on disclosure from a third party which is not legally prohibited from disclosing such information (iv) was independently developed by admedicum without reference to, aid from or reliance upon the Confidential information of the client, as evidenced by written records. Notwithstanding the foregoing, Confidential Information may be disclosed by admedicum to the extent as required by law or to comply with any court order, statute or governmental directive, provided that admedicum promptly notifies the client of such requirement (except where restricted by applicable Law), cooperates with client if Company seeks a protective order or other remedy to protect such Confidential Information, and furnishes only that portion of the Confidential Information which admedicum is legally required to disclose.

7.3. Data Protection

Personal data privacy is a major right of individuals. It is particularly important to protect sensitive personal data, notably a person's personal health data such as the data handled by admedicum.

It is admedicum's policy to take data privacy very seriously. It is a key part of the company's credibility and integrity, especially when interacting with patients and handling their personal data. Therefore, admedicum team members shall always not only adhere to, but even supersede legal requirements regarding data privacy if this is in the interest of the person whose data are being processed.

A detailed guide on data protection can be found in the *MAN-05 Data Privacy Manual*. It describes the processes of creating data privacy related materials and documents. Furthermore, it also provides guidance on who is responsible for the creation and the quality control of the materials as well as which materials involving data privacy are used at admedicum.

7.4. Pharmacovigilance

According to the WHO, "Pharmacovigilance is the science and activities relating to the detection, assessment, understanding and prevention of adverse effects or any other medicine/vaccine related problem."

admedicum is only involved in Step 1 ("Detection") and *SP-09 Pharmacovigilance* is providing a description of the different steps and tasks to be followed to ensure a timely and compliant detection and reporting of adverse events and product complaints. The overall objective of the *SP-09 Pharmacovigilance* is to provide all admedicum team members with guidance on the procedures and responsibilities involved in Pharmacovigilance.

7.5. Anti-trust and anti-insider trade compliance

Our company is committed to conducting business in a manner that complies with all applicable laws and regulations, including anti-trust laws and regulations against insider trading. This chapter outlines our policies in these areas.

7.5.1. Anti-Trust Compliance

Anti-trust laws, also known as competition laws, are designed to promote fair competition and prevent practices that restrict competition. We are committed to complying with all applicable anti-trust laws in the jurisdictions where we operate. In particular, admedicum will:

avoid agreements or understandings with competitors that could restrict competition, such as price-fixing, market allocation, or bid-rigging; not abuse any dominant market position our company may hold; ensure that all business dealings are conducted in a manner that is fair and does not restrict competition; never support, directly or indirectly, activities of clients violating anti-trust compliance. Any employee who is unsure whether a particular business practice complies with anti-trust laws should seek advice from the Leadership Team.

7.5.2. Anti-Insider Trading Compliance

Insider trading involves trading in a company's securities based on material, non-public information about the company. It is illegal and can result in severe penalties, including fines and imprisonment. admedicum Personell are prohibited from:

Trading in any other company's securities (e.g. clients) based on material, non-public information that became known in the course of professional duties for admedicum.

Sharing material, non-public information with others who might trade on the basis of that information. Any concerns or suspicions of non-compliance should be reported immediately to a member of the Leadership Team.

7.6. Anti-bribery compliance

Bribery involves offering, giving, receiving, or soliciting something of value as a means to influence the actions of an individual or organization. It is illegal and can result in severe penalties, including fines and imprisonment.

Our company has a zero-tolerance policy towards bribery. admedicum Personnel are prohibited from: Offering, giving, soliciting, or receiving any form of bribe, kickback, or other illicit payment or benefit, either directly or indirectly. Using third parties, such as agents or consultants, to engage in bribery on our company's behalf. Offering or accepting gifts, hospitality, or expenses that could influence, or appear to influence, a business decision. Our anti-bribery policy applies to all business dealings and transactions, in all countries where we operate. It applies to all employees, directors, officers including members of our Leadership Team, and any third parties acting on our company's behalf.

Any employee who suspects or becomes aware of any violation of our anti-bribery policy is required to report it immediately to a member of the Leadership Team. We are committed to investigating all reported violations promptly and thoroughly. We also provide regular training and education to our employees to ensure they understand our anti-bribery policy and the laws and regulations related to anti-bribery and corruption.

7.7. Transparency

In our role as a solution provider in the healthcare industry, we recognize the critical importance of transparency in all our relationships, including those with healthcare professionals, patients, patient organizations, and public decision-makers. This chapter outlines our commitment to transparency and our policies in this area.

This includes:

- Clearly explaining the nature and purpose of our consulting services.
- Disclosing any potential conflicts of interest.
- Providing accurate and balanced information about healthcare options, based on the best available evidence.
- Disclosing any financial or non-financial support we provide to patient organizations either on our own discretion or on behalf of a client.

- Clearly identify our company and the nature of our services in all communications and interactions. We will always disclose our client to the other party, unless specifically requested and agreed otherwise with that client, where legally possible and acceptable from a behavioural compliance perspective. This may be the case, for example, if disclosing the client's name at the beginning of a conversation could create a bias. In the event that the client should not be disclosed to the healthcare professional, patient representative or decision maker, we will clearly state that we are working on behalf of an industry client and that the client has specifically requested that their name not be disclosed. However, whenever possible, we will offer our counterparts the opportunity to learn the identity of the client at the conclusion of the meeting or interview. Providing accurate and balanced information to inform policy and decision-making.
- Avoiding any actions that could be perceived as unduly influencing policy or decision-making.

As admedicum is a registered lobbyist with the Deutsche Bundestag, we have committed ourselves to adhere to the Code of Conduct for lobbyists that can be downloaded here: https://www.bundestag.de/parlament/aufgaben/rechtsgrundlagen/go_btg/anlage2a-851252

admedicum will also commit itself and adhere to any other codes for lobbyists issued by public institutions, parliaments or governments of the European Union and its member states, the United Kingdom, the European Economic Area, Switzerland, the United States of America, Canada, Japan and Australia, if so requested. For all other geographies, admedicum will do the same if and as long as the institutions themselves adhere to the principles of democracy, freedom and justice.

7.8. Respecting the independence of partners

admedicum values the collaboration and partnership with various stakeholders in the healthcare sector, such as healthcare professionals (HCPs), patient advocacy groups and patient organisations, patient activists, journalists, and others. We recognise that these partners have their own legitimate interests, opinions, and perspectives, and we respect their autonomy and independence in pursuing them. We do not seek to influence, manipulate, or coerce our partners in any way that would compromise their integrity, credibility, or reputation. We also do not accept any undue influence or pressure from our partners that would interfere with our professional standards, ethical principles, or contractual obligations.

We follow the relevant codes of conduct, guidelines, and best practices for our industry and the specific domains of our partners, such as the EFPIA Code of Practice, the ABPI Code of Practice, the EUPATI Guidance for Patient Involvement, the “Leitsätze der Selbsthilfe” in Germany, the FSA and AKGs code of practice, the WMA Declaration of Helsinki, etc.

We seek to understand and respect the cultural, linguistic, and social diversity of our partners and their communities, and we tailor our communication and engagement strategies accordingly.

We solicit and incorporate feedback from our partners and evaluate the impact and outcomes of our collaboration and partnership, and we strive to improve our performance and quality continuously.

We expect our partners to share our commitment to respecting the independence of each other and to abide by the same or equivalent standards of conduct as we do. We reserve the right to terminate any collaboration or partnership that violates these principles or causes harm to our reputation or interests.

7.9. IT security

For the sake of completeness, compliance with IT security measures are listed here. However, please refer to MAN-04 IT chapter 5 for more details.