

Rhei Life's Code of Conduct and Ethics

CONTENTS LIST

1. Aim, Vision and Core Values
2. The purpose of the Rhei Life's Code of Conduct and Ethics
3. Responsibility for compliance with Rhei Life's Code of Conduct and Ethics
4. The conduct expected
5. The Principles of the Rhei Life's Code of Conduct and Ethics

1. AIM, VISION AND CORE VALUES

Our aim is to become recognizable as the pathfinder for successful business solutions to all stakeholders having mutual aim: delivering of quality medicine to patients. Our vision is to be desirable as a representative and distributor of worldwide pharmaceutical producers of biological and biosimilars, original and generic medicines, food supplements and medical devices. Our values represent integrity acting with strong ethics, honesty as a core business practice to act in a transparent manner and earns the respect of the partners, accountability as accepting responsibility for one's actions as a way to build trust, learning in a culture of humility, teamwork for creating something greater than ourself individually and quality by maintaining the highest standards. We will become a desirable as a representative and distributor by being the best in the following focus areas:

- Wide Portfolio
- Best Quality
- Excellent Service
- Exceptional People/Team
- Great Cost/Value performance

2. THE PURPOSE OF THE RHEI LIFE'S CODE OF CONDUCT AND ETHICS

The Code provides direction and information on Rhei Life's business activities. All employees and those acting on behalf of Rhei Life must comply with the Code and Rhei Life's policies and procedures. Breaching the Rhei Life's Code and policies might cause major consequences for the company and every individual. Violating the Code can result with corrective measures, or even employment termination and reporting to the authorities.

3. RESPONSIBILITY FOR COMPLIANCE WITH RHEI LIFE'S CODE OF CONDUCT AND ETHICS

The Code applies to all employees and managers as well as to our third party consultants, contractors and suppliers to the extent they engage in activities described in the Code. Responsibility for compliance with the Code and Rhei Life's policies and procedures is added to laws, rules and regulations. Every and each of those must act in a way that supports our vision and core values. Especially the managers are expected to be a role model for others. They should make effort to ensure that individuals who report to them receive guidance, resources and training they need to enable them to do their job in compliance with the Code and Rhei Life's policies. They ought to take responsibility for creating an environment of trust in which people feel allowed to ask questions, raise concerns and report suspected violations. There may be disciplinary action for the management in case of any lack of diligence, supervision or leadership with regard to the application of the Code policies and procedures. Rhei Life expect temporary and contract employees, consultants, agents and any other third party who acts in Rhei Life's name to act in accordance with the principles of the Code. Anyone who is involved in retaining such third parties is responsible to ensure that they are made aware of the Code and the expectation that they act in accordance with its principles.

4. THE CONDUCT EXPECTED

Everyone should read, understand and adopt this Code which means that one must:

- Learn about and comply with the laws, rules, regulations and policies and procedures that apply his/her job or work
- Receive training on the Code provided either by Compliance Officer or by Human Resources
- Sign the Rhei Life Code of Conduct and Ethics statement to confirm to have read, understood and comply with the Code
- Certify the compliance occasionally as part of the annual review to ensure to keep updated with changes to the Code
- Seek advice and guidance if unsure about the course of action to take and encourage others to do so
- Always report promptly any potential or actual breaches of the Code of which aware to the manager, Human Resources, or the Compliance Officer

5. THE PRINCIPLES OF THE RHEI LIFE'S CODE OF CONDUCT AND ETHICS

- (A) Comply with laws, rules and regulations
- (B) Promote a culture of integrity, respect and trust in the workplace
- (C) Maintain product quality, safety and integrity as well as supporting the environment, public health and safety
- (D) Promote the products truthfully and maintain positive interactions with health care professionals
- (E) Act responsibly in the use of Rhei Life's assets
- (F) Assure the integrity of books and records
- (G) Safeguard confidential information and individuals' personal information
- (H) Avoid conflicts of interest
- (I) Comply with international trade laws
- (J) No insider trading
- (K) Act with integrity and ethically in all business dealings

(A) COMPLY WITH LAWS, RULES AND REGULATIONS

Rhei Life aims to set a good corporate example in every manner and is thus committed to comply with its procedural documents, all applicable laws, rules, regulations, and industry codes of countries where Rhei Life does business. Violation of such laws, regulations and industry codes may subject Rhei Life and its employees to civil and/or criminal penalties, including imprisonment. All employees, managers and any third-party acting on Rhei Life's behalf is expected to be familiar with and ensure compliance with the Code, and all applicable Rhei Life policies and procedures. If a local custom or law in the business or region in which Rhei Life operates differs from the Code or the policies and procedures of Rhei Life, one must follow the most stringent rules and should seek guidance from immediate supervisors or from the Compliance Officer in case of ambiguity as to which regulatory requirements apply to your activities or in case you have any questions regarding application of the law or Rhei Life policy. This Code sets out minimum requirements, which must be followed unless doing so would violate local law, in which case, one is required to inform its supervisor or Human Resources or the Compliance Officer.

B) PROMOTE A CULTURE OF INTEGRITY, RESPECT AND TRUST IN THE WORKPLACE

An integrity-based culture promotes a workplace that one can enjoy and be proud to be a part of. This means treating others as you would expect to be treated – fairly, honestly, with integrity, respect and trust. Rhei Life promotes an equal opportunity environment for all.

(i) Equal Opportunity Free from Discrimination or Harassment

Rhei Life welcomes and promotes diversity and is committed to providing equal opportunities in a positive work environment for all employees regardless of their race, sex, religion, colour, age, sexual orientation, marital status, ancestry or citizenship. As such, Rhei Life promotes a professional environment free from any form of verbal or physical intimidation, discrimination or harassment.

(ii) A Healthy and Safe Working Environment for all Employees

Rhei Life recognizes the importance of a safe and healthy environment for work. With this in mind, regardless of one's role within the organization one is expected to know the health and safety requirements of his/her job and to conduct in a manner that promotes and protects the safety and wellbeing of him/her and the colleagues. Rhei Life's policy is to maintain a drug-free working environment. Possession, use or being under the influence of illegal drugs is strictly prohibited. If one participates in company sponsored events where alcoholic beverages are available, he/she is expected to use good judgement and behave in a manner appropriate for a company function. These concepts apply in the workplace, on Company property and in any work-related setting outside of the workplace, such as during business trips, meetings and business-related social events.

(C) MAINTAIN PRODUCT QUALITY, SAFETY AND INTEGRITY AS WELL AS SUPPORTING THE ENVIRONMENT, PUBLIC HEALTH AND SAFETY

Rhei Life is committed to providing medicines that meet or exceed customer expectations and regulatory requirements while complying with global current Good Manufacturing and Good Distribution Practices. Rhei Life also monitors safety data associated with our marketed medicines for having patient safety as a priority. Rhei Life is both ethically and legally obliged to track and report any adverse events or product quality complaints associated with its products. Rhei Life is committed to protecting the integrity of its products and brands from counterfeiting, tampering, thefts or diversion. Rhei Life conducts business in an environmentally sustainable manner and considers environment protection, as well as personal and public health and safety, an important role within everyday responsibilities.

(D) PROMOTE THE PRODUCTS TRUTHFULLY AND MAINTAIN POSITIVE INTERACTIONS WITH HEALTH CARE PROFESSIONALS

Rhei Life markets the products on the basis of quality, efficacy, safety and value. Compliance with applicable laws and adherence to ethical standards are important to Rhei Life's ability to continue to collaborate with health care professionals. This extends to ensuring that all promotional activities and

presentations used by Rhei Life or its employees, including product claims and comparisons, are accurate, balanced, fair, objective, unambiguous and consistent with product labelling. Any product efficacy claim must be substantiated and balanced with relevant safety information. Statements should not mislead the intended audience. Interacting with health care professionals and medical institutions is an important part of Rhei Life's business. These interactions are subject to many laws and regulations to help ensure they are appropriate. They can take the form of research and development, training, education, service and support to enable the safe and effective use of Rhei Life products, and supporting medical research, education, and enhancement of professional skills. In the event that any research or business require engaging the services of a health care professional, it is done only for meeting a legitimate and appropriate business purpose and when the terms of the engagement are consistent with legal and Rhei Life policies' requirements. Rhei Life adhere to applicable industry guidelines and other regulations, only offering hospitality in a manner that is consistent with our policies and conducive to educational, clinical or scientific discussions. Where required by law, Rhei Life collect, report and disclose payments and other transfers of value made to healthcare professionals. For ensuring ethical interactions with individuals or entities that purchase, recommend, or use Rhei Life products, the policies and procedures prescribed in the Code must be followed.

(E) ACT RESPONSIBLY IN THE USE OF RHEI LIFE'S ASSETS

Rhei Life provides assets that employees need to successfully perform duties. These include (a) physical items, such as buildings, computers, furniture, office supplies and equipment, and (b) informational assets, such as intellectual property, work documents and electronic information. All these assets contribute to Rhei Life's success and should be used only for legitimate business purposes. Therefore, one is expected to use these assets responsibly and protect them against loss, theft, or other misuse. The incidental personal use of Rhei Life's devices and technology (computer, internet access) is permitted as long it does not interfere with one's performance or the performance of one's colleagues and does not violate the Code. Any suspected improper use, loss or theft should be reported to the supervisor.

(F) ASSURE INTEGRITY OF RHEI LIFE'S BOOKS AND RECORDS

Accurate information and timely reporting are essential for good decision making. All of Rhei Life's books and records must be accurate, full, fair and honest and must comply with Rhei Life policies and procedures. In addition, Rhei Life is committed to providing full, accurate, fair, timely and understandable financial records and accounts in accordance with applicable external accounting requirements and accounting standards. All records and documents created should be retained in accordance with applicable law and the Rhei Life document safekeeping policy. Where there are differences between the Rhei Life policy and local legal retention requirements, guidance should be sought from the Compliance Officer.

(G) SAFEGUARD RHEI LIFE'S CONFIDENTIAL INFORMATION AND INDIVIDUALS' PERSONAL INFORMATION

As with all companies and organizations, Rhei Life has information that is valuable and confidential. While performing day-to-day tasks one may learn or gain access to this valuable confidential information, thus it is one's responsibility to safeguard this information against inappropriate use or disclosure. Confidential information means all information that is not currently known or generally available to the public and can include patent applications, trade secrets, business strategy, product development or launch plans, manufacturing information, marketing plans, pricing information, merger or acquisition plans and personally identifiable information (e.g. national identification numbers, contact information, credit card data and health information). Such information may be owned by Rhei Life or by third parties with whom Rhei Life has an agreement to share/use information. It is critical not to discuss any confidential information with family, friends, co-workers or anyone that does not have a legitimate business need to know. In addition, any confidential information should not be communicated with reporters, market research firms or investors. Any external request received for information must be immediately passed to the Rhei Life management representative or the Compliance Officer. Rhei Life holds a considerable amount of information which relates to employees, patients, health care professionals, contractors, customers and others. Privacy laws exist globally, and, therefore, preserving the confidentiality of private information about individuals and organizations Rhei Life deals with is critically important to. Rights

of privacy of those individuals' must be respected and safeguarded and also the confidential nature of such information, regardless of the source, subject, owner or purpose of the data.

(H) AVOID CONFLICTS OF INTEREST

Rhei Life's employee or contractor must conduct any business dealing in the name of Rhei Life ethically and fairly and in the best interests of Rhei Life. This means that all the dealing in the name of Rhei Life must be free of any real or potential conflict of interest. A conflict of interest may exist if employee, management member, his/her family member or close friend works for, owns, or is a director of a company with which Rhei Life conducts or wishes to conduct business and when such individual is in a position to influence that decision to conduct business. Rhei Life business decisions must be governed by good judgment and objectivity, without concern for any personal interests. If one encounter a real or potential conflict of interest, he/she must disclose such interest in writing to the manager preferably in advance who will determine whether the Legal department and/or the Compliance Officer need to be consulted or notified.

(I) COMPLIANCE WITH INTERNATIONAL TRADE LAWS

As a company with global operations, Rhei Life complies fully with all applicable international trade laws. As these laws limit Rhei Life ability to engage in business interactions with or in certain countries, conducting business internationally must be mindful of relevant laws. Rhei Life will follow all applicable laws, regulations and restrictions when importing or exporting goods, information, software or technology. The export and re-export of goods are highly regulated around the world. If one is involved in any global trade activities, he/she is responsible for knowing relevant laws, including export and import controls and trade restrictions. Rhei Life will also abide by applicable anti-boycott laws and will promptly report to authorities any request for Rhei Life to participate in a boycott.

(J) NO INSIDER TRADING

Securities of publicly held companies cannot be traded on the basis of insider information. If one have knowledge of material non-public information about other companies, Rhei Life is doing business with, he/she should treat the information as confidential and should not trade in the stock of these companies. Material non-public information includes any information that might influence an investor's decision to buy or sell securities or that could have an impact on the price of a company's securities if the information was publicly released. Examples of insider information include proposed merger or acquisition, projections of earnings or losses, launch of a new product, gain or loss of a significant business relationships, and changes in company leadership

(K) ACT WITH INTEGRITY AND ETHICALLY IN ALL BUSINESS DEALINGS

Rhei Life encourages ethical business practices and socially responsible industry conduct, and is committed to fair competition. Rhei Life will not permit, encourage nor support any unlawful inducement in order to sell of its products or services.

(i) Fair Dealing with Customers and Suppliers

Rhei Life is committed to dealing fairly with its business partners, relying on the merits of its products and people. Rhei Life respect and adhere to fair competition and trade practices laws. Therefore, it will not discuss or make any improper agreement with the competitors that affects prices, costs or terms or conditions of sales, unfairly restricts trade or excludes competitors, suppliers or customers from the marketplace. Rhei Life will not disparage competitors' products and expects competitors to hold themselves to similarly high standards.

(ii) Anti-Bribery and Anti-Corruption Policy

Everyone must understand and strictly comply with all applicable anti-bribery legislation. It is against Rhei Life policy to bribe anyone or receive a bribe from anyone, anywhere in the world, irrespective of whether this may result in Rhei Life losing a business opportunity. One must not offer, authorise, process, make, request or accept payment of money or anything of value to improperly:

- (a) influence the judgement or conduct of any individual, customer or company,
- (b) win or retain business,
- (c) influence any act or decision of any governmental official, or
- (d) gain any improper or undue advantage.

These requirements extend not only to direct inducements, but also to indirect inducements made in any form through agents, consultants, distributors or other third parties.

(iii) Political Contributions

Political Contributions to a political party, party official, or candidate for office on behalf of Rhei Life are strictly prohibited. Any such contributions made on a personal basis should not make any reference to the Rhei Life in any way. Any identification of the Rhei Life in connection with campaigning or fundraising on behalf of a political party, party official or candidate for office is strictly prohibited.

(iv) Business Courtesies

Business courtesies, which can include gifts, hospitality, travel, entertainment, or anything else of value, should be provided only for a legitimate business purpose and must be approved in advance in accordance with the Rhei Life procedures. Specifically, business courtesies should not:

- violate local laws, regulations or Company policies,
- be viewed as an inducement for a particular business decision,
- be lavish or excessive in value,
- be inappropriate in terms of venue

If one has any doubt as to whether it is appropriate to accept a gift, he/she must promptly disclose the situation to the immediate supervisor or the Compliance Officer to seek appropriate guidance before taking action.

After reading and getting to know and understood the Code one may reasonably ask - **WHAT SHOULD ONE DO IF/WHEN FACED WITH AN ETHICAL OR LEGAL CONCERN?**

It is one's responsibility to raise any concerns regarding possible violations of the Code with the manager, Human Resources, the Legal department, or the Compliance Officer. It is essential that, if being in suspect of any wrongdoing by any officer, employee or contractor that, act quickly in order that the issue can be investigated and addressed as quickly and as efficiently as possible. Ones prompt action can help reduce the wider impact of any wrongdoings or violations of the Code and therefore under no circumstances should you investigate the matter yourself.

CONTACTING THE COMPLIANCE OFFICER

Rhei Life offers ways for speaking up, asking questions, and raising concerns regarding potential violations to the Company's Code of Conduct and Ethics, policies, or laws. These channels include (1) Legal Department, (2) Human Resources, and (3) our managers.

In addition, Rhei Life has developed a confidential email address where reports can be made at any time by anyone who has observed an issue. Your personal information will be kept confidential and will only be used by the Rhei Life Compliance Officer to follow up on any issues raised. compliance@rhei.life

PROTECTING ONE'S IDENTITY AND SAFEGUARDING CONFIDENTIALITY

When contacting the Compliance Officer, your identity will be kept confidential. Open communication is crucial to the success of the Company. Rhei Life is committed to maintaining a work environment where people can ask questions, raise concerns, and make appropriate suggestions regarding business practices. Therefore, Rhei Life strictly prohibits any form of retaliation against anyone who in good faith reports any actual or potential Code violations or concerns. If you anyone feel's to be the subject of retaliation for making a good faith report then he/she must immediately contact his/her manager, Human Resources or the Compliance Officer.

CONCLUSION

Rhei Life is proud of the work it does, but also of how it is done. Code or policies guarantee compliance with the law or ethical decision-making only if combined with a continued sense of individual responsibility and commitment to doing the right thing. Therefore, it is individual responsibility for acting with ethical integrity in order to collectively become a leader in healthcare industry.