

Code of Conduct

A guide to our general business standards and principles



*ms*pharma



Message from the Chairman

Dear MS Pharma Colleagues,

Improving the health and quality of life of our communities is at the centre of our mission at MS Pharma. In order to realize this mission, we are all required to work according to the high standards of integrity expressed in our Code of Business Conduct.

We all have a personal responsibility to uphold and foster the standards that we set for ourselves and to act in a way that maintains and improves the reputation of MS Pharma. This Code applies to all of us and is intended to outline the standards of behaviour, decision making and working relationships that we are all expected to uphold on a daily basis. In doing so we will contribute to our ongoing success and ensure that our company remains an organization that we are proud of.

We are asked to deliver the highest results in the most ethical way. As a global company, it is essential to combine success and responsibility. Only this combination ensures that we remain a valued long-term business partner and an attractive employer. Please confirm your adherence to our Business Code of Conduct by signing a copy of this letter.

Thank you for your commitment.

Yours sincerely,
Ghiath Munir Sukhtian

G. Sukhtian



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What is the Code of Conduct?

What is the Code of Conduct?

It is our guide to the way we operate and to our general business standards and principles. It also helps us live our corporate values.

In this Code we set out our standards and principles under several descriptors. Each descriptor is linked to an example listed under “Employee Responsibility” and this example is intended to illustrate how these principles and standards should operate in practice. These examples are not, however, intended to restrict or limit the way our principles and standards are interpreted or implemented.

In general, always ask yourself:

- Is my conduct or decision lawful?
- Is it in keeping with our Code of Conduct?
- Is it correct and free from personal conflicts of interest?
- Do my actions protect the role MS Pharma plays in society?
- Would I feel comfortable if my personal conduct were made public?

If your answer is NO to any of these questions or in case, you have any other questions on this Code of Conduct you should please not hesitate to contact the departments or persons mentioned as contact information at the end of this Code of Conduct “Point of Contact”.

Who is this Code of Conduct for?

This Code of Conduct is for our employees throughout the MS Pharma Group, and also for our stakeholders, suppliers, customers, regulators and our business partners so that they know how we operate and what is expected of them.

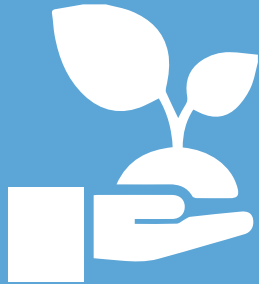
How does this Code relate to our employees?

You must read it, understand it, sign it and act according to it. Also, this Code must be read at all times with all other corporate policies circulated by the HR Department and listed in Annex 1 of this Code.

Our Code has information about our way of dealing with business internally and externally how we see ourselves. It also provides guidance as to how you can deal with circumstances which are covered by our Code. If any employee is confronted with any situation or incident that he / she considers a violation of the values and standards of MS Pharma Group and the principles covered under this Code, he / she should report it to his / her Supervisor, Manager, Human Resources, the Compliance Officer or the Hotline.

* The MS Pharma Group

The MS Pharma Group means MS Pharma (the parent) & any subsidiary owned by the parent (hereinafter referred to as “MS Pharma Group” or the “Company”).



Our values translate into Standards and Principles that we work with and abide by. They shape the way we conduct our business and the way we interact with each other and with our stakeholders.

Our Values in Action

Our values guide us in the we conduct business and shape our responsibility towards ourselves and others.



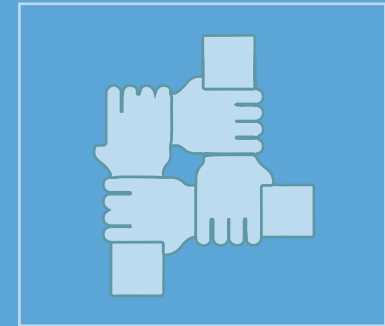
Respect
for
People



Integrity
&
Transparency



Quality
&
Excellence



Teamwork



Respect for People

Be Safe, Be Fair, Embrace Diversity

- Equal Employment Opportunity
- Harassment
- Health, Safety and Environment
- Employee Privacy
- Use of Drugs and Alcohol
- Non-Retaliation Policy

Respect for People

Be Safe, Be Fair, Embrace Diversity

1- Equal Employment Opportunity

We commit to treating our employees fairly through inclusion and diversity.

We appreciate diversity in backgrounds and approaches, we respect and embrace the differences among our people and we value and respect the different views and ideas that result from their differences.

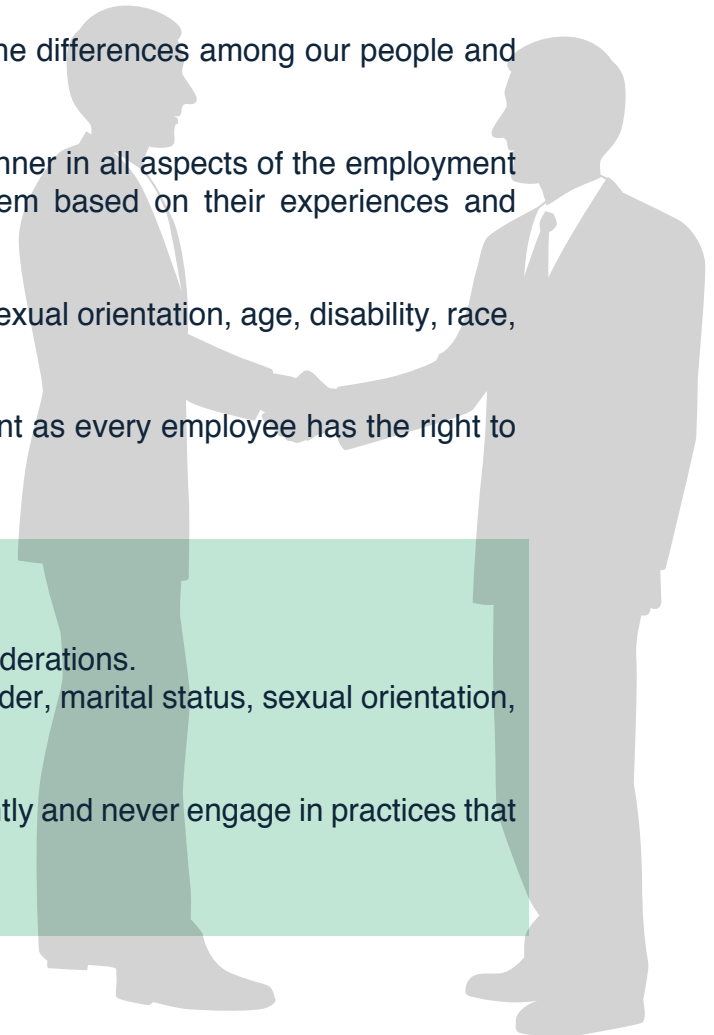
We are an equal opportunity employer, we implement our policies in an impartial manner in all aspects of the employment relationship through our commitment to hire employees, promote and develop them based on their experiences and capabilities and pay fair compensation based on position and performance.

We do not discriminate against anyone based on nationality, gender, marital status, sexual orientation, age, disability, race, religion or other factors.

All decisions that affect employment status are based on the principle of fair treatment as every employee has the right to work in an environment free of any form of discrimination or unfair treatment.

Employee Responsibilities:

- Hire, train, develop and promote based on experience, performance and business considerations.
- Do not be biased or discriminate against anyone on account of his or her nationality, gender, marital status, sexual orientation, age, disability, race, religion or otherwise.
- Listen to the concerns of your employees and support them.
- Maintain a culture of fair treatment by treating everyone you deal with fairly and consistently and never engage in practices that could lead to unfair treatment.



Respect for People

Be Safe, Be Fair, Embrace Diversity

2- Harassment

Harassment can be defined as “behavior which is persistent and results in the person subjected to the behavior feeling upset, threatened, humiliated or vulnerable”.

- We aim to provide an ideal working environment which is enjoyable, healthy, safe, comfortable and free of any feelings of intimidation or hostility or aggressive behavior towards any employees, suppliers, customers or other business partners.
- Thus, harassment (including sexual harassment of any kind, swearing or other strong language and physical or visual forms of harassment) is strictly prohibited. False or defamatory accusations are prohibited, whether verbally or in writing.
- Any employee resorting to any methods of harassment in the context of his or her job will expose himself or herself disciplinary action.

Employee Responsibilities:

- Do not tolerate harassment.
- Never make sexual pranks or jokes in person or via e-mail.
- Do not touch colleagues or grab someone in an inappropriate way.
- Don't stand too close or brush up against a person.
- Do not display pictures, flags or other material, which state or imply prejudicial attitudes, which may be offensive to fellow employees.
- Never use slurs, oral or written.
- Do not attempt to manipulate an individual's reputation by rumor, gossip or ridicule.
- Allow others to voice their opinions.
- Never conduct or permit any form of physical abuse or make threats of abuse.

 Zero tolerance for discrimination and harassment

Respect for People

Be Safe, Be Fair, Embrace Diversity

3- Health, Safety and Environment

We care about and look after the health and safety of our employees and the environment we work in.

The strict adherence to policies and standards protecting health and safety and our environment is one of the most important professional and ethical values at MS Pharma, as we seek to conduct our business in an environment characterized by health and safety and our care for the communities we operate in.

Employee Responsibilities:

- Abide by health and safety instructions.
- Take good care of your own health and safety.
- Report work-related injuries and illnesses to HR immediately.
- Take good care not to put other people - fellow employees and members of the public - at risk by what you do or don't do in the course of your work.
- Co-operate with your employer, making sure you get proper training and you understand and follow the Company's health and safety policies.
- Don't interfere with or misuse anything that's been provided for your health, safety and welfare.
- Report any injuries, strains or illnesses you suffer as a result of doing your job, your employer may need to change the way you work.
- If you drive or operate machinery, you have a responsibility to tell your employer if you take medication that makes you drowsy.



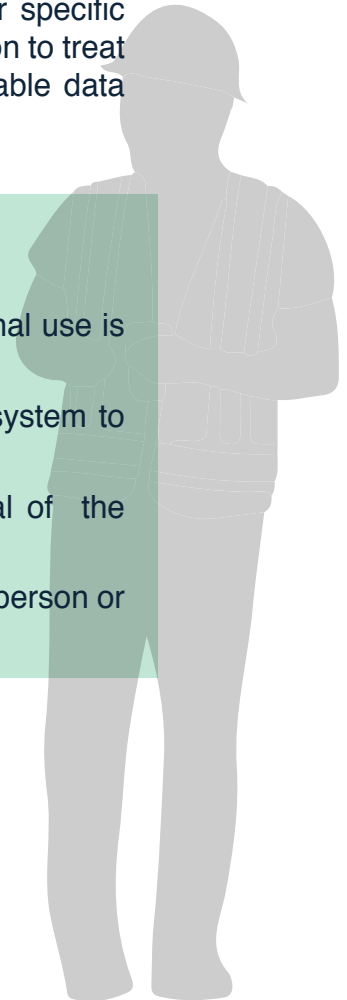
Respect for People Be Safe, Be Fair, Embrace Diversity

4- Personal Data Protection

We respect privacy rights of our employees, customers and other stakeholders and process personal data for specific business purposes only and secure those data against unauthorized access. MS Pharma takes all necessary action to treat personal data confidentially and only collect, process and store data according to the provisions of the applicable data protection laws.

Employee Responsibilities:

- To use the workplace and all items provided by the Company for work purposes only, even though limited personal use is permitted.
- You should have no expectation of privacy when you use the Company's work space, computer, voicemail or system to create, access, transmit, or store information.
- You should not access another employee's workspace, including electronic files, without prior written approval of the management.
- You should not give out any personal data of employees or other stakeholders to anyone unless authorized by the person or the HR function.



Respect for People Be Safe, Be Fair, Embrace Diversity

5- Use of Drugs and Alcohol

We are committed to providing a healthy and safe working environment. The Company considers the acquisition or use of drugs or other substances affecting your behavior or mood at the workplace or attending the workplace under the influence of drugs or other substances is unacceptable. This will be considered a violation of safe work practices and will result in a disciplinary action.

Employee Responsibilities:

- Conduct yourself professionally at all times. Keep illegal drugs and alcohol away from the workplace.
- An employee who reports to work under the influence of, or is unfit to work because of, the effects of drugs or alcohol will be subject to disciplinary action which may include termination of employment.



Respect for People

Be Safe, Be Fair, Embrace Diversity

6- Non-Retaliation

Retaliation – is any inappropriate action taken or threatened against an employee because the employee has, in good faith, made a concern regarding a violation. Such actions affect the employment rights and can take two forms: work or social.

Examples of work-related retaliation may include, but are not limited to:

- Unproven adverse performance evaluations or disciplinary actions.
- False negative job references.
- Irrational denial of salary increases, promotions or other job benefits.
- Unjustified reduction or limitation in work assignments.

Examples of social retaliation in the workplace may include, but are not limited to:

- Discrimination or harassment from direct manager and/or co-workers.
- Bullying, which could be through repeated threatening or humiliation, insults, or social isolation.
- Hostile work environment, described as any offensive conduct or reaction that alter the conditions of employment.
- Physical threats and/or destruction of personal properties.

Employee Responsibility:

- Reporting Process - If an individual believes that he or she has been subjected to retaliation, s/he should either contact the office to which the initial complaint was filed or to the compliance officer.





Integrity and Transparency

Be Honest, Be Transparent, Show Integrity,
Empower:

- Open Door Policy
- Anti-Bribery and Corruption
- Conflict of Interest
- Political Views
- Insider Trading
- Gifts and Hospitality
- Import & Export Controls
- Anti-Money Laundering
- Financial Integrity

Integrity & Transparency

Be Honest, Be Transparent, Show Integrity, Empower

1- Open Door Policy

The Company has an “Open Door Policy” for all employees, providing opportunities to present work-related concerns, ideas or suggestions. The Company believes that to be innovative and healthy, an Open Door Policy is the way to communicate with our employees, to listen to their concerns and suggestions and to provide an environment of openness.

The Open Door Policy is intended to encourage employees to communicate their concerns, ideas or suggestions and also to provide them with the option of carrying their concern to the next level of higher management.

Employee Responsibilities:

- Employees are expected to offer suggestions and ideas, provide or give feedback, seek personal or professional counsel, or address concerns within the company in a professional manner.
- Managers to empower employee to speak openly.
- Employees can communicate and confide with senior management with no restrictions and use this e-mail employeequestions@mspharma.com

2- Anti-bribery and Corruption

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all of our business dealings and relationships.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

“Bribe” means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way.

Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

“Bribery” includes offering, promising, giving, accepting or seeking a bribe. All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager or HR Department.

Integrity & Transparency

Be Honest, Be Transparent, Show Integrity, Empower

Specifically, you must not:

- A) Give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received.
- b) Accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage to them or anyone else.
- c) Give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.

You must not threaten or take retaliatory action against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

If you are offered a bribe, or asked to offer one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your manager or HR Department or report it in accordance with our Whistleblowing policy as soon as possible.

Employee Responsibilities:

- Do not offer, seek or accept bribes in order to obtain business.
- Always act with honesty and integrity.
- Report any incidents of bribery and corruption.
- Inform people you work with that bribery is not accepted.



Integrity & Transparency

Be Honest, Be Transparent, Show Integrity, Empower

3- Conflict of Interest

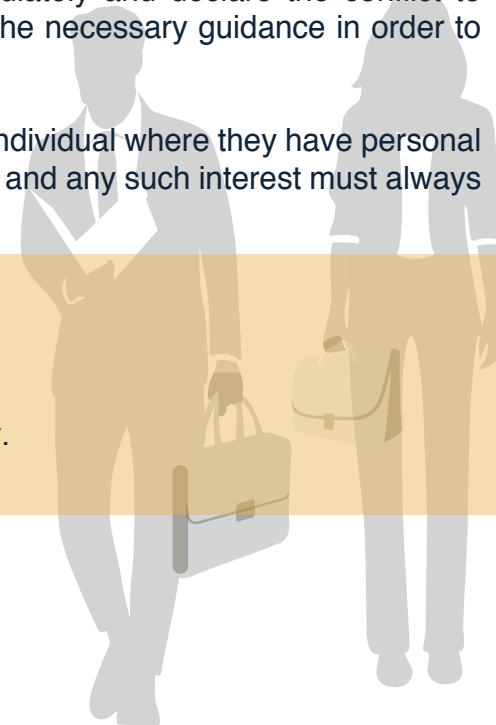
A conflict of interest can arise in several situations. Wherever possible, these situations should be avoided. In almost all cases, disclosure is the best policy for situations where a conflict of interest arises or might arise.

As an employee you must not engage in any activity which conflicts with the interests of the MS Pharma Group, its customers, its suppliers or business partners. We recognize the right of employees to engage in activities outside their employment which are of a private nature and unrelated to our business. However, if you find yourself in a situation which presents a conflict of interest you are expected to withdraw from the situation immediately and declare the conflict to management. In response, the Company will assess the matter and provide you with the necessary guidance in order to avoid conflict.

Employees should never give preferential treatment to any organization, corporation or individual where they have personal or financial interest, direct or indirect, which conflicts with the performance of their duties and any such interest must always be disclosed.

Employee Responsibilities:

- Disclose actual or potential conflicts of interests to your manager or HR Department.
- Do not let your decisions be influenced by personal gain.
- Disclose information to management about any of your relatives working in the Company.



Integrity & Transparency

Be Honest, Be Transparent, Show Integrity, Empower

4- Political Views

We encourage our employees to participate in their communities, which may include political activities and the right to vote. However, it is imperative that you understand that these engagements should not be conducted on behalf of the Company or mistaken as the Company taking a stance to support or endorse any candidate, political party or political position.

Employee Responsibilities:

- All political activities shall be done on personal time and without involvement of any of the Company's resources.
- No political contributions may be made by or in the name of the Company without prior approval from the Board of Directors.

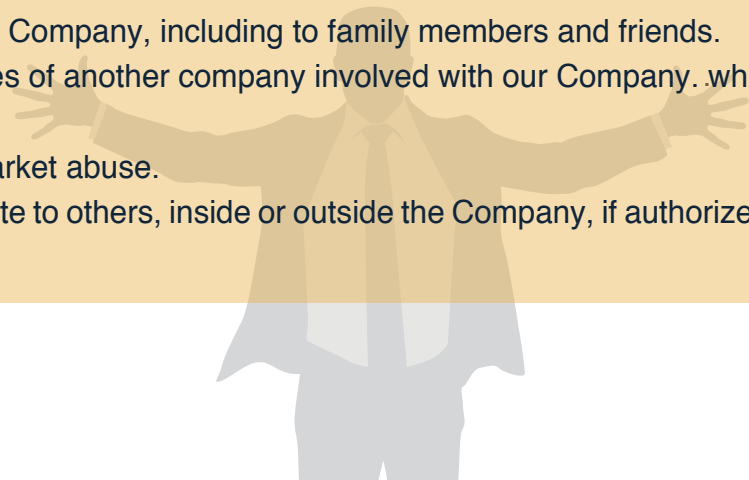
5- Insider Trading

The course of involvement with the Company, you may obtain non-public, confidential information about the Company or other Companies that could affect the price of the Company's stock or compromise a business transaction if shares publicly. "Non-public information" is information that is known within the Company but has not been publicly released.

"Material information" is information that a reasonable investor would consider important when deciding to buy or sell securities.

Employee Responsibilities:

- You should not disclose material non-public information outside the Company, including to family members and friends.
- You should not transact in the Company's securities or the securities of another company involved with our Company. while you have material, non-public information.
- To comply with all applicable laws relating to insider trading and market abuse.
- Protect the Company's confidential information and only communicate to others, inside or outside the Company, if authorized.



Integrity & Transparency

Be Honest, Be Transparent, Show Integrity, Empower

6- Gifts and Hospitality

This policy does not prohibit giving or accepting reasonable and appropriate gifts mainly when given for legitimate purposes such as building and strengthening business relationships or maintaining our image or reputation, but such gifts and hospitality must be modest, appropriate, infrequent and given, or accepted, with care to avoid misinterpretation. Gifts and entertainment must not be offered to influence a decision or cause others to perceive an influence.

A gift or hospitality won't be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example: during contractual negotiations or a tender process).

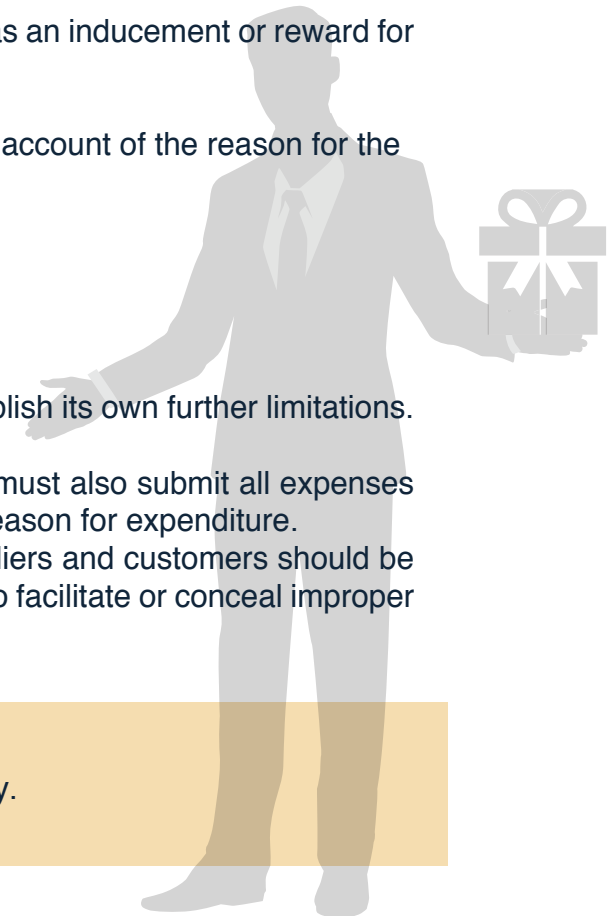
- Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift.
- Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret.
- Gifts must be given in our name, not your name.

Normally, the value of gifts should not to exceed 50 USD. Each country of operation will establish its own further limitations.

You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to gifts or hospitality in accordance with our expenses policy and record the reason for expenditure. All accounts, invoices and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "Off the record" to facilitate or conceal improper payments.

Employee Responsibilities:

- Only agree to provide or accept gifts or hospitality if this is strictly within the terms of our policy.
- Never offer money as a gift.



Integrity & Transparency

Be Honest, Be Transparent, Show Integrity, Empower

7- Import & Export Control

As an International Company, we have a duty to understand the various import and export laws that apply to our international trading activities. Before exporting any of our products, we must be sure that both the recipient and the country of delivery have been verified, that all duties and taxes have been paid, and that the proper documentation is in place. We should also comply with embargoes and economic sanctions imposed by the United nations, U.S., E.U. and other countries to restrict or prohibit trade dealings with certain countries, entities and individuals.

Employee Responsibilities:

- Never engage in restrictive trade practices.
- To not engage in business in breach of recognized trade restrictions or sanctions.
- Obtain legal review of any transaction involving any country subject to sanctions or embargo.



Integrity & Transparency

Be Honest, Be Transparent, Show Integrity, Empower

8- Anti-Money Laundering

We comply with all laws that prohibit money laundering or financing of illegal or illegitimate purposes.

“Money Laundering” is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate. We are always on the lookout for warning signs that could indicate possible money laundering. Employees should immediately report any of the following incidents to their supervisors, managers, or the compliance department:

- Payments made in currencies other than those specified in the invoice.
- Orders not consistent with a customer’s or supplier’s usual practices.
- Requests for or attempts to make payments in cash or a cash equivalent.
- Payment made by or to a third party not involved in the contract or an account other than the normal business relationship account.
- Requests to make payments to suppliers or agents to accounts in a country where the supplier or agent is not located.
- Requests to ship products to a third party or third country other than the country where either the buyer or seller are located.
- Requests made to make an overpayment.

Employee Responsibility:

You should always ensure that you are conducting business with reputable customers, for legitimate business purposes, with legitimate funds.

9- Financial Integrity

For corporate purposes we provide accurate and transparent financial information in accordance with International Financial Reporting Standards (IFRS). On the country level the same quality of information is given pursuant to local generally accepted accounting principles. We maintain effective controls over financial reporting to ensure an accurate record of our financial transactions.

Being a globally operating company, we are obliged to comply, both with national and international tax regulations.

We explicitly oppose any kinds of misuse of tax evasion structures and are not supporting any acts of customers, business partners and employees to mislead tax authorities.



Quality & Excellence

Be Compliant, Protect, Excel:

- Reliability & Quality
- Safeguarding Company Assets
- Compliance with all Laws and Regulations:
 - A- Regulatory Laws
 - B- Competition Laws

Quality & Excellence

Be Compliant, Protect, Excel

1- Reliability & Quality

We are committed to providing products that are safe, effective and of the highest quality. We are ethically and legally obligated to ensure that quality of our products meets the highest safety standards. We implement certain controls to ensure our facilities meet good operating practices.

We are all responsible for reporting any safety, quality, or performance issues concerning any of our products or processes. Our commitment to public health means that we always handle product complaints promptly and according to appropriate Company procedures.

Remember, our Company is subject to many rules and regulations designed to protect patients and consumers, improve the quality of medicines and healthcare services and help eliminate fraud and improper influence of medical judgment.

We are committed to following the laws and regulatory requirements that govern our business, including the development, manufacturing, distribution, marketing, government contracting, sales and promotion of our products.

Employee Responsibilities:

- To know the product quality standards, policies, and procedures that apply to the products produced at your location.
- To follow good manufacturing practices and testing protocols.
- To comply with all applicable food and drug safety laws and regulations.
- To be alert for situations that could compromise our products and report any thing you see that could negatively affect the quality of our products.

2- Safeguarding of Company Assets

Company assets include financial assets, physical assets, intellectual property and information. Our assets are valuable and must be protected, used and managed appropriately. Employees are expected to respect and observe policies designed to protect and safeguard our buildings, equipment, and Company information and data, software, product formulations, creating and maintaining accurate records and security of facilities.

Assets should not be used for personal gain and misuse of assets will not be tolerated.

Employee Responsibilities:

- Help to protect Company assets against loss, abuse, waste, misuse, theft and damage.
- You must use communication facilities such as internet and e-mail, mobile, desk phone responsibly and not compromise Company network security.
- Do not share Company or financial information without prior approval.
- Never give out personal information about employees.



3- Compliance with all Laws and Regulations

Our policy is to comply with all laws and regulations applicable to the conduct of our business. You should, therefore, not take any action, or fail to take any action, which you know, or should know, will cause the MS Pharma Group to violate an applicable law or regulation.

Since the MS Pharma Group does business in a number of countries, the applicable laws vary for different locations or different transactions.

Except to the extent certain laws are applicable to our worldwide activities, it is our intent to apply the individual laws of each country in which we operate to our activities in that country.

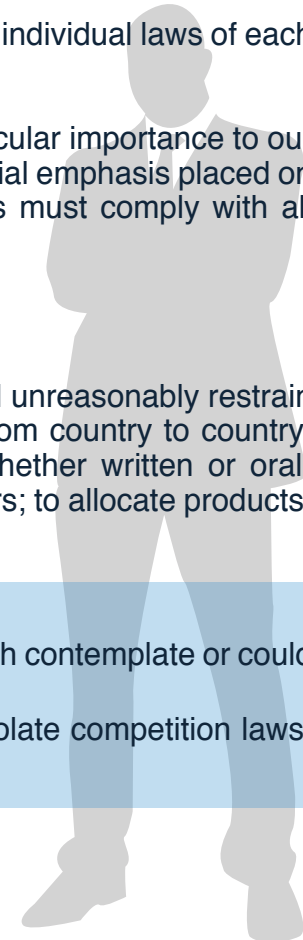
The sections which follow provide guidance with respect to certain areas of the law which have particular importance to our business activities and which must be complied with. It should be understood, however, that the special emphasis placed on these aspects of our business does not in any way limit the general requirement that employees must comply with all applicable laws and regulations.

A- Competition Laws

Competition and antitrust laws are intended to preserve competition by prohibiting actions that could unreasonably restrain the functioning of a free and competitive marketplace. Although the laws vary in some respects from country to country, agreements and actions commonly found to violate competition laws include understandings (whether written or oral) between or among competitors to fix or control their prices; to boycott specified suppliers or customers; to allocate products, territories, or markets; or to limit the production or sale of their products or product lines.

Employee Responsibilities:

- Do not engage in such conduct or enter into written or oral agreements, or engage in discussions, which contemplate or could result in such conduct.
- If you find yourself in a transaction or discussion with a third party which you are concerned may violate competition laws, contact the GM or the HR Department for your jurisdiction for guidance before you go any further.



Quality & Excellence

Be Compliant, Protect, Excel

B- Regulatory Laws

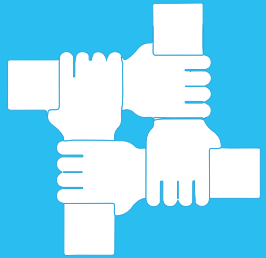
There are many laws and internationally accepted guidelines (e.g. GMP) which regulate the safety and quality of our products.

These regulatory laws impose strict requirements on the development, manufacture, labelling and sale of our products and all these laws and guidelines must be strictly complied with.

Employee Responsibility:

- Comply with all laws and regulations in the way you conduct business.





Teamwork

Be Responsible, Collaborate, Work together:

- Intellectual Property and Confidential Information
- Communication Systems
- Media Communications
- Social Media
- Commitment to Community



Teamwork

Be Responsible, Collaborate, Work Together

1- Intellectual Property and Confidentiality Information

The ideas, concepts and other information generated by or for the MS Pharma Group are important assets. This “intellectual property” is central in developing new products and attracting new business opportunities. Examples of intellectual property include patents, trademarks, copyrights and trade secrets. You are responsible for protecting our intellectual property at all times.

In addition to protecting our intellectual property, we will also afford this respect towards the intellectual property of others.

You may have access to and / or become knowledgeable about sensitive information that is confidential, private or proprietary to the MS Pharma Group or our competitors, customers and suppliers. Such information (or confidential information received from third parties) can only be used for Company purposes and must only be disclosed to those within the MS Pharma Group who have a need to know.

The MS Pharma Group respects information that is confidential, private or proprietary to third parties, and accordingly employees must not receive or use such third party information without that party’s permission or knowledge.

Employee Responsibilities:

- Do not disclose confidential information to outside parties, vendors and suppliers.
- Do not talk in public about confidential information where others may over hear.
- When dealing with confidential information, only include other employees in emails who “need to know”.
- Report any loss or theft of information to your manager.



Teamwork

Be Responsible, Collaborate, Work Together

2- Communication Systems

The Company maintains electronic communication systems and equipment (including systems for emails, mobile phones and internet websites) to assist in the conduct of its business. These systems, including the data stored on the systems, are and remain at all times the property of the Company. Employees must use all these systems and equipment responsibly and comply with the Company's IT, Email and Internet Policy.

Employee Responsibilities:

- Use all electronic communication equipment provided by the Company responsibly.
- Comply with the Company's IT, Email and Internet Policy.

3- Media Communications

The MS Pharma Group takes relationships with the media seriously. Wrong or misleading information can damage the reputation of the Company.

Employees are not permitted to discuss any aspect of the Company's business or its policies with any representative of the media, (e.g. the newspapers, radio or television), or at any Company event or gathering without written authorization from senior management.

Employee Responsibility:

- If you are contacted by the media, explain that you will pass on details and then inform your manager.



Teamwork

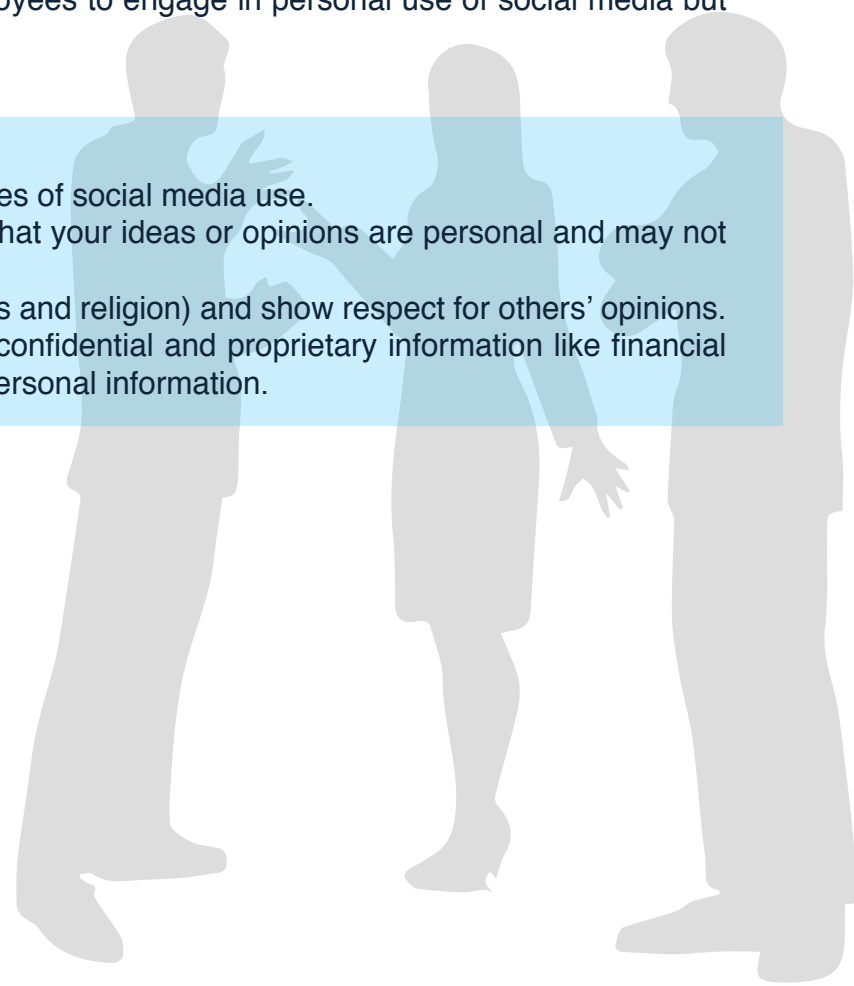
Be Responsible, Collaborate, Work Together

4- Social Media

We seek to use the newest forms of technology and communication to reach our communities according to applicable promotional laws and regulations. Also, we respect the rights of employees to engage in personal use of social media but must adhere to our values and company policies.

Employee Responsibilities:

- Use discretion and common sense regarding the potential consequences of social media use.
- While disclosing that you are an MS Pharma employee, make it clear that your ideas or opinions are personal and may not represent the position of the Company on the issue.
- Be careful when discussing things that can be controversial (e.g. politics and religion) and show respect for others' opinions.
- Do not use social media to discuss issues that involve MS Pharma's confidential and proprietary information like financial information, strategy, legal issues, forecasts, clients and employees' personal information.



Teamwork

Be Responsible, Collaborate, Work Together

5- Commitment to Community

We are proud of our contributions to the quality of life and culture and to the economic and social development in the communities in which we do business. We encourage each of our subsidiaries and affiliates to become actively involved in their community by sponsoring and participating in initiatives that contribute to a better quality of life.

We strongly encourage everyone to support this goal by being active in the civic life of our communities, by volunteering and participating in charitable and other activities, as well as participating in professional development associations. However, we need to ensure that any outside activity does not interfere with job performance or create a conflict of interest or even the appearance of a conflict of interest.



Contact Information

If you have any questions regarding one of the principles outlined in this Code of Conduct, please don't hesitate to contact the following contact points "Point of Contact":

- Your Manager
- Corporate Compliance Department (a.i. Head of Audit)
- Corporate or local HR Department
- Corporate or local Legal Department

If you have observed or suspect a violation of the provisions of this Code of Conduct, please also contact the above mentioned persons / departments.

MS Pharma is committed to treat all reported incidents confidential and serious. Your report will be reviewed and evaluated. There will be no any retaliation for making a good faith report of actual or potential misconduct.

Acknowledgment

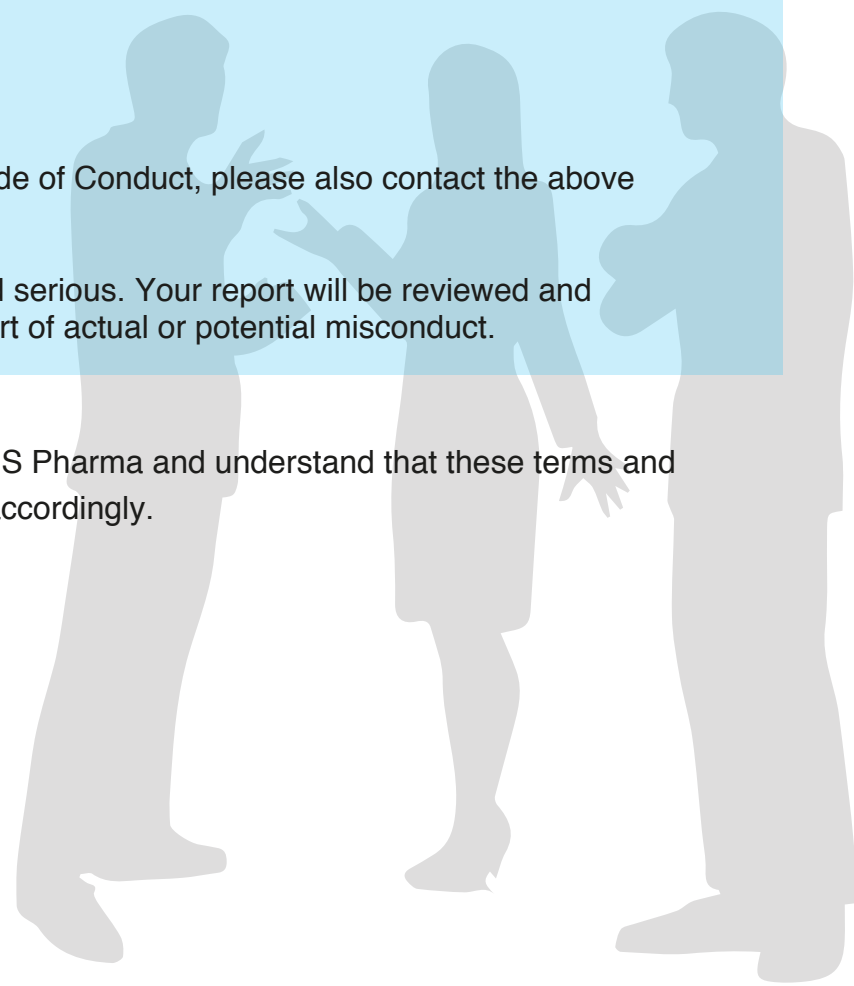
I hereby acknowledge receiving and reading the Code of Conduct of MS Pharma and understand that these terms and conditions form part of my contract of employment and I accept them accordingly.

Name: _____

Department: _____

Date: _____

Signature: _____



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