

CODE OF CONDUCT

PREPARED BY: _____

Health Care Compliance Officer

APPROVED BY: _____

Managing Director

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Table of Contents

1.0 Message from the CEO	4
2.0 Introduction	6
3.0 Purpose.....	7
4.0 Roles and Responsibilities	9
Liability of the Acts of Business Partners	9
Implications of Not Following This Code of Conduct	9
5.0 Workplace	10
Health and Safety	10
Quality Assurance	11
Data Protection	12
Our colleagues	13
Communications and Trainings	14
Social Media	15
Security, IT, Access Control	17
6.0 Marketplace	19
Adverse Events and Product Quality Complaints	19
Conflict of Interest	20
Gifts, Meals and Entertainment	20
Fair Dealing	20
Educational and Promotional Activities	21
Anti-bribery and anti-corruption	21
Competition Law	22
Public Procurement	22
Recognizing Government Officials (GOs)	23
Relationship with Customers and Consumers (incl. interaction with HCPs, GOs, HCOs)	23
Relationship with stakeholders/ Principals	25
Disclosure of Transfer of Value and Disclosure Code	26
Financial Integrity/ Accurate Books and Records	27

7.0 Society	28
Corporate Social Responsibility	28
8.0 Environment	29
9.0 Reporting Violations (How to Speak Up).....	30
Contact Details	30
10.0 Conclusion	31

1.0 Message from the CEO

Our Commitment to Excellence and Responsibility

At VHP our ultimate aim is to deliver high quality products and services while maintaining the highest-level ethical standards.

Our core mission is to serve and improve the quality of life of the individuals and communities we touch. We recognize our paramount responsibility in delivering safe, effective, and accessible healthcare products and services across multiple categories. Our dedication to patient and consumer well-being extends to all areas of our operations.

Ethical conduct forms the bedrock of our business. We are committed to upholding the highest standards of ethics, integrity, and transparency throughout our operation and the extended product portfolio. Our unwavering adherence to ethical behavior encompasses every aspect of our activity spectrum and extends to our partners and collaborators.

We embrace innovation as a driving force not only for business growth but also for the creation of positive impact to the society we serve. Our vision is to continually identify new opportunities and promote products and services that meet the evolving needs of our customers while contributing to the betterment of health and well-being of the communities we serve.

Our commitment to sustainability encompasses amongst other policies, practices that promotes respect to the environment, responsible sourcing and social welfare.

We pledge to comply with all applicable laws, regulations, and industry standards, ensuring that our business practices are beyond reproach. Our dedication to transparent reporting and governance ensures that our stakeholders can trust in our ethical conduct.

Our dedicated employees are the heartbeat of our organization and constitute a significant and uncompromised consideration in whatever we do. We wholeheartedly appreciate your commitment and the exceptional work you perform daily. We commit to prioritizing your well-being, fostering your professional development, and supporting your growth within our organization.

To our employees, I extend my heartfelt gratitude for your unwavering dedication and invaluable contributions. You exemplify our values and drive our success.

To our suppliers, customers, and all our valued partners, we look forward to building and strengthening our collaborations. We aim to establish enduring relationships built on trust, reliability, and mutual prosperity.

To our stakeholders, your trust and support inspire us to pursue excellence every day. We are grateful for your confidence in our commitment to responsible business practices.

Together, we shall uphold these principles, ensuring that VHP remains a paragon of ethical, responsible, and customer/patient-centric across the diverse range of our operation.

Thank you for being integral to our journey.

Sincerely,

Christos Hadjipanayis

Managing Director

Varnavas Hadjipanayis Ltd

2.0 Introduction

At Varnavas Hadjipanayis Ltd (VHP), we are committed to upholding the highest ethical and legal standards in all of our business practices while complying with all applicable laws and regulations. This Code of Conduct serves as a compass, guiding our employees, partners and affiliates through our company's policies and procedures for conducting business in an ethical and compliant manner. This Code applies to all employees, officers, and director of our company, including new employees at time of hiring, as well as to our business partners and agents. We expect all employees, officers, and directors to understand and comply with the applicable laws and regulations, and to seek guidance when needed.

The reputation of VHP is of high importance. VHP employees shall not engage in any misconduct that could jeopardize the Company's reputation, its Principals, or third-party relationships, as well as avoid situations that have any appearance of impropriety. No bribes should be offered, requested, paid or accepted.

Company resources are only be used for legitimate business purposes in the best interest of VHP. Incidents, risks and issues contrary to this document should be reported to the Health Care Compliance Officer (HCCO).

3.0 Purpose

The purpose of the code of ethical conduct is to establish a clear framework of ethical principles and guidelines that govern the behavior and actions of employees within the organization. The code of ethical conduct serves several important purposes:

Upholding Integrity: The code sets the expectation for employees to act with integrity and honesty in all aspects of their work. It emphasizes the importance of ethical decision-making, transparency, and accountability, thereby fostering trust and credibility in the company's operations.

Ensuring Compliance: The pharmaceutical and medical device industry is subject to numerous regulations and standards aimed at safeguarding public health and safety. This code of ethical conduct helps the company comply with legal requirements, industry regulations, and best practices, ensuring that all operations adhere to the highest standards of quality, safety, and efficacy.

Patient-Centric Approach: The code emphasizes the company's commitment to the well-being and safety of patients. It promotes ethical behavior in the handling, storage, and distribution of pharmaceutical products and medical devices to ensure that patients receive high-quality, safe, and effective healthcare products and services.

Transparency and Fairness: The code promotes transparency in business practices, including pricing, marketing, and promotional activities. It encourages fair competition, prohibits misleading advertising or deceptive practices, and ensures that interactions with healthcare professionals and stakeholders are conducted with integrity and professionalism.

Ethical Marketing and Promotion: The code provides guidelines for the responsible marketing and promotion of pharmaceutical products and medical devices. It emphasizes the importance of accurate and evidence-based information, avoiding deceptive marketing tactics, and maintaining the highest standards of scientific integrity and professionalism.

Conflict of Interest Management: The code addresses conflicts of interest that may arise in the course of business activities. It provides guidance on identifying, disclosing, and managing conflicts to ensure that decisions are made in the best interest of patients and stakeholders, free from undue influence or bias.

Protection of Confidentiality and Privacy: The code underscores the importance of maintaining confidentiality and privacy in handling sensitive patient and customer information. It ensures that employees understand their responsibility to protect confidential data and comply with applicable data protection laws and regulations. Moreover, all employees are responsible to safeguard the confidentiality of the business information of the company.

Ethical Supplier Relationships: The code promotes ethical relationships with suppliers and partners, emphasizing fair and transparent procurement practices, anti-corruption measures, and responsible supply chain management. It encourages the company to work with suppliers who share the same commitment to ethical conduct and social responsibility.

Reporting and Whistleblower Protection: The code of ethical conduct establishes channels for reporting potential violations of ethical standards or legal requirements. It ensures that employees can report concerns without fear of retaliation, and it guarantees that appropriate investigations and actions are

taken to address reported issues.

By adhering to a code of ethical conduct, VHP demonstrates its commitment to ethical business practices, regulatory compliance, patient safety, and the well-being of the healthcare community it serves. It helps build trust among stakeholders, protects the reputation of the company, and contributes to the overall integrity of the industry.

4.0 Roles and Responsibilities

It is every employee's responsibility to understand and comply with the Code of Conduct and to report any potential violation of policy or law, including violations raised by third parties.

4.1 Liability of the Acts of Business Partners

Business Partner Responsibility: All involved parties are responsible for conducting business with utmost integrity and in compliance with applicable laws and regulations. Business partners are expected to exercise diligence in their actions, making every effort to avoid engaging in any activities that could bring harm to the reputation, brand, or legal standing of any involved party.

Joint and Several Liability: The parties recognize that they may be jointly and severally liable for the actions and conduct of their respective business partners. This means that if any business partner is found to be in violation of relevant laws, regulations, or ethical standards, all parties may be held accountable for the consequences, including potential legal, financial, and reputational repercussions.

Due Diligence and Oversight: All parties that have been identified to have any compliance risk due to their activities are responsible for conducting thorough due diligence before entering into any business partnership with our company. This includes evaluating the reputation, compliance history, and ethical practices of potential partners. Furthermore, ongoing oversight of business partners is essential to identify and address any deviations from agreed-upon standards promptly.

Reporting and Escalation: In the event of any suspected or actual breaches of this code of conduct by a business partner, it is the duty of all involved parties to report such incidents to the VHP Compliance department (compliance@hadjipanayis.com.cy). Timely escalation and resolution of issues are essential to mitigate potential liabilities and risks.

Amendment and Termination: In the interest of maintaining a high standard of ethical business practices, any party may recommend amendments to this code of conduct as necessary. Additionally, if a business partner consistently fails to uphold the principles outlined herein, the involved parties reserve the right to terminate the partnership, subject to any contractual obligations.

4.2 Implications of Not Following This Code of Conduct

Our standards and policies apply to everyone who works for or on behalf of VHP. Failure to comply with them or any applicable legal and regulatory requirements may result in disciplinary action, up to and including dismissal or termination of contract or assignment.

Managers have the responsibility to ensure that their team members understand and follow this code of conduct and applicable written standards.

5.0 Workplace

5.1. Health and Safety

At Varnavas Hadjipanayis, the health and safety of our employees, customers, visitors, suppliers and all individuals associated with our operations are of paramount importance. We are committed to creating and maintaining a safe and healthy work environment, and all employees and stakeholders are expected to comply with the following health and safety guidelines:

Compliance with Applicable Laws: All employees and stakeholders must comply with all relevant health and safety laws, regulations, and industry standards that govern our operations.

Responsibility for Personal Safety: Each individual is responsible for their personal safety and the safety of others around them. Employees should report any hazardous conditions, accidents, or incidents to their immediate supervisor or the Human Resources Manager or the Health and Safety officer promptly.

Workplace Hazard Identification and Mitigation: All employees are encouraged to actively participate in identifying workplace hazards and potential risks. If any hazards are identified, the Health and Safety team must take appropriate measures to mitigate or eliminate them.

Training and Education: The company provide adequate health and safety training to all employees, enabling them to perform their duties safely and effectively. Employees should actively engage in these training programs and seek clarification when needed.

Safety Equipment and Facilities: The company is committed to providing a safe working environment by ensuring the availability and proper maintenance of safety equipment, emergency response resources, and first aid facilities.

Substance Abuse and Alcohol Policy: The consumption of alcohol or illegal substances during work hours or while operating company equipment is strictly prohibited. This policy aims to maintain a safe and productive workplace for everyone.

Emergency Response Procedures: VHP is prepared for possible events to protect people and help ensure that our company can survive any disruptions, including manmade or natural disasters. Please keep your contact information up to date to ensure you, or a designated contact, can be reached in an emergency or crisis situation. All employees are expected to familiarize themselves with emergency response procedures, including evacuation routes, assembly points, and contact information for emergency services.

Reporting Accidents and Near Misses: All accidents, injuries, near misses, and potential hazards must be reported immediately to the appropriate supervisor or Health and Safety team. Timely reporting helps prevent future incidents and ensures proper investigation and resolution.

Continuous Improvement: We are committed to continuously improving our health and safety system. Feedback from employees regarding safety concerns, suggestions for improvement, or best practices is highly valued and encouraged.

Consequences of Non-Compliance: Failure to comply with health and safety regulations and company policies may result in disciplinary action, up to and including termination, depending on the severity and frequency of the violation.

By adhering to this health and safety clause, we can create a secure work environment that promotes the well-being of all individuals associated with VHP. Together, we can foster a culture of safety, reduce accidents and incidents, and safeguard the health and welfare of our workforce.

5.2. Quality Assurance

At VHP, we are dedicated to maintaining the highest standards of quality and compliance in all aspects of our operations. As a distributor of pharmaceuticals, medical devices, diagnostics, food supplements, infant nutrition and baby care products, cosmetics and fragrances, optics and fast-moving consumer goods in Cyprus, we have implemented a robust Quality Management System (QMS) to ensure the safety, efficacy, and integrity of the products we distribute. All employees and stakeholders are expected to adhere to the following Quality Assurance guidelines:

Compliance with Regulatory Requirements: We will comply with all applicable laws, regulations, and industry standards pertaining to the distribution of our products. Our commitment to quality extends to all aspects of our operations, from procurement and storage to distribution and customer service.

Product Quality and Integrity: We are dedicated to ensuring the quality and integrity of the products we distribute. All products must be sourced from reputable manufacturers and suppliers who adhere to stringent quality standards. We will maintain proper storage and handling procedures to prevent product contamination, spoilage, or deterioration.

Adherence to Good Distribution Practices (GDP): We will strictly adhere to Good Distribution Practices, as outlined by relevant regulatory authorities. This includes proper documentation, storage conditions, transportation, and quality control measures to safeguard product quality throughout the supply chain.

Employee Training and Competency: We will provide comprehensive training to all employees involved in the distribution process to ensure they are competent and knowledgeable about quality requirements, compliance standards and best practices. Continuous education and development will be encouraged to stay up-to-date with industry advancements.

Continuous Improvement: We are committed to continuously improving our Quality Management System and distribution processes. Regular assessments, audits, and evaluations will be conducted to identify areas for improvement and implement corrective and preventive actions.

Customer Focus: We will prioritize the needs and safety of our customers by delivering products and services that meet their requirements and expectations. Timely and accurate communication regarding product information, safety updates, and recalls will be ensured.

Product Traceability: We will establish and maintain a robust product traceability system to track the movement of products throughout the supply chain. This includes proper identification, lot tracking, and documentation to enable swift and efficient product recalls, if necessary.

Reporting Non-Conformities: All employees must promptly report any non-conformities, quality issues, or potential risks to their supervisors or the Quality Assurance department. Timely reporting is essential for swift resolution and preventive measures.

Ethical Conduct: We will uphold ethical principles and transparency in all quality-related matters, ensuring that our actions are aligned with our commitment to quality and compliance.

Consequences of Non-Compliance: Failure to comply with Quality Assurance standards, regulatory requirements, or the company's QMS may result in disciplinary action, up to and including termination, depending on the severity and frequency of the violation.

By adhering to this Quality Assurance clause and our established Quality Management System, we reaffirm our dedication to delivering safe, reliable, and high-quality products and services to our customers. Through a collective commitment to quality, we can further strengthen our reputation and trust within the healthcare community and beyond.

5.3. Data Protection

We are committed to protecting the privacy and confidentiality of personal data entrusted to us in line with applicable data protection laws and regulations. We recognize the importance of safeguarding sensitive information. This Data Protection clause outlines our commitment to data privacy and the responsibilities of all employees and stakeholders:

Data Protection Compliance: We will comply with all relevant data protection laws, including the General Data Protection Regulation (GDPR) in the European Union, and any other local data protection regulations in Cyprus. Our Data Protection Officer (DPO) has been appointed to oversee our data protection efforts and ensure compliance.

Lawful and Transparent Processing: We will only collect, process, and store personal data for lawful and legitimate purposes. Employees must ensure that individuals are informed of the processing activities involving their personal data and that their consent is obtained where required.

Data Minimization: We will only collect and retain personal data that are necessary for the specific purposes outlined in our data processing activities. Employees should avoid collecting excessive or unnecessary personal information.

Data Accuracy: We will take reasonable steps to ensure that personal data we hold are accurate, up-to-date, and relevant. Employees should promptly update any inaccuracies in the data they handle.

Data Security: We will implement appropriate technical and organizational measures to protect personal data from unauthorized access, disclosure, alteration, or destruction. Employees are responsible for adhering to data security policies and guidelines to safeguard the information they handle.

Data Transfers: Any transfer of personal data to countries outside the European Economic Area (EEA) will be done in compliance with the relevant data protection laws and, if necessary, with appropriate safeguards, such as standard contractual clauses or adequacy decisions.

Data Subject Rights: We respect the rights of data subjects, including the right to access, rectify, erase, restrict processing, and object to the processing of their personal data. Employees should promptly address any data subject requests they receive and escalate them to the DPO via email to dpo@hadjipanayis.com.cy , if needed.

Data Breach Management: In the event of a data breach or security incident involving personal data, employees must report it immediately to their supervisor and the DPO. The DPO will oversee the investigation, containment, and notification processes in compliance with relevant laws.

Third-Party Processors: When engaging third-party processors, we will conduct due diligence to ensure their data protection practices align with our standards. Data processing agreements will be established with such processors to regulate the handling of personal data.

Data Protection Training: We will provide regular data protection training to employees to enhance their awareness and understanding of data privacy principles and their responsibilities under this clause.

Non-Disclosure of Personal Data: Employees must not disclose personal data to unauthorized individuals or entities, and they should refrain from using personal data for purposes outside the scope of their job responsibilities.

Consequences of Non-Compliance: Failure to comply with data protection laws, regulations, and the company's data protection policies may result in disciplinary action, up to and including termination, depending on the severity and frequency of the violation.

By incorporating this Data Protection clause into our code of conduct, we uphold our commitment to respecting data privacy, maintaining confidentiality, and protecting the rights of data subjects. Together, we can ensure the responsible and ethical handling of personal data, bolstering trust and confidence in our company as a reliable distributor in the healthcare industry.

5.4. Our colleagues

At VHP, we promote and value a workplace free of discrimination, any form of harassment and retaliation which extends to all interactions within the VHP community, including third-parties and customers. We aim to provide a healthy work environment and culture, one where everyone is respected, welcome and included.

Non - Discrimination and Anti – Harassment

We do not discriminate in employment opportunities or practices on the basis of race, color, gender, religion, disability, national origin, age, sexual orientation, marital status, or any other characteristic protected by applicable law.

Our non-discrimination in employment applies to recruitment, hiring, compensation & benefits, promotions, discipline, terminations, access to benefits and training and all other aspects of employment.

We provide a safe and pleasant work environment where everyone is treated with fairness and respect. Harassment of employees in the workplace will not be tolerated either. Any employee who violates the company policy against harassment will be subject to disciplinary action, up to and including demotion or termination.

Employees are encouraged to bring any questions or concerns about discrimination or harassment in the workplace and submit relevant reports to the Human Resources Department.

Non-Retaliation

It is our policy and practice to maintain the highest ethical standards, and to create a workplace free of inappropriate or unlawful behavior, in which people are encouraged to share their concerns with the Company without fear of retaliation. To this end, no adverse action will be taken against any employee, former employee, agent or third party for complaining about, reporting, participating or assisting in the investigation of a suspected violation of the Company's Code of Conduct, Company policy, or applicable law, unless the allegation made or the information provided is found to be intentionally false or not made or provided in good faith. To the maximum extent possible, VHP will maintain the confidentiality of all complaints. All allegations of retaliation will be investigated, and if appropriate, disciplinary action will be taken, up to and including termination.

Equity, Diversity & Inclusion

We respect the principles of equal opportunities and mutual respect among all employees. Every employee receives the same treatment and the same opportunities at all stages of the employment relationship including recruitment, training & development, career advancement, compensation & benefits, termination of employment. The VHP community is committed to developing and supporting a diverse, equitable, and inclusive community, where all members create and feel a sense of belonging.

Learn more in our Equal Opportunity Employer Policy Statement.

5.5. Communications and Trainings

Officers, directors and managers must communicate the Code of Conduct to ensure that all employees and relevant business partners understand and comply with the policies herein.

All current VHP employees will receive the relevant training, while new employees will be trained upon hiring. Employees will be required to confirm in writing that they understand and comply with these policies and will report any violations that come to their attention.

5.6. Social Media

Statement Policy

The purpose of the company's policy with regards to the use of social media is to communicate its expectations with regards to the use of social media.

"Social media" are online platforms or online games through which users connect with each other, share content and they interact like e.g., Facebook, YouTube, WhatsApp, Facebook Messenger, Instagram, We-Chat, TikTok, QQ, QZone, Sina Weibo, Snapchat, Reddit, Twitter, LinkedIn, Pinterest, Discord and online games.

Private Use: where an employee using a social media platform in a personal capacity will not make any reference directly or indirectly to the Company, its people, products or services, and/or other business-related organizations connected to the Company.

Note that this policy does not apply to employee's personal use of social media platforms where the employee makes no reference to the Company, its people, products, services and any other business-related organizations connected to the Company. The Company reserves the right to revise and/or abolish this policy, at any time.

In any case, racist speech, hate rhetoric, and behavior that could promote unethical conduct are not allowed.

Personal Use: Each employee is personally responsible and liable to the Company for the content published in a personal capacity on any social media platform which directly and/or indirectly refers to the Company. Undermining the public image, reputation, development, operation of the Company, its people, products, services and/or any other business-related organizations is not permitted.

Instructions for personal use of social media

- **Be Honest About Who You are.** If you are discussing the Company or topics that are related to its business or industry, clearly identify who you are and your role in the Company. State clearly that the views you are expressing are your own. Under no circumstances imply that you are authorized to present yourself and/or comment as a representative of the Company.
- **Respect Your Audience, Co-workers and Privacy.** Be polite and respectful to all people you interact with. Do not post and/or respond to material that is profane, offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, or otherwise inappropriate or unlawful. Do not share your colleague's personal information (such as health), work-related information (such as travel schedules), images of them, any conversations, or statements attributable to them without their permission.
- **Protect Confidential and Proprietary Information.** Do not use or disclose any confidential or proprietary information of the Company, such as business plans and prospects, business performance, financial information, marketing information, production information,

operation procedures, dispute or litigation matters, photos or videos of the Company's offices, or any other workplace of the Company, or the Company's sponsored activities, the identities of its employees, vendors, customers, suppliers, franchisees, partners or supplier, and/or any confidential details of a supplier or franchisee relationship, unless the information has been disclosed or released by the Company to the public or otherwise is in the public domain. Do not disclose the identities of colleagues without their permission.

- **Protect the Company's Trademarks and Copyrights.** Do not use any of the company logos, images or copyrighted material without permission. This also includes our Principals' logos, trademarks or name in a manner that violates their policies or the applicable laws. Do not make public any material which may cause damage to the reputation of the Company or dishonor its business image.
- **Respect the Law.** Bear in mind that laws in relation to copyright, trademarks, privacy, defamation, contempt of court, consumer protection, discrimination and harassment apply to your activities on social media platforms. These laws are in addition to the terms of use of the relevant social media platforms, and the Company's applicable internal policies to which you must adhere.
- **Media Queries.** If your posts, when using social media on a personal basis, generate media coverage or inquiries related to the Company, its products or services, you must immediately notify the Quality Assurance Department.
- **Inappropriate Content.** Do not respond and/or comment to inappropriate content published by third parties of the online community that relate to the Company, its people, products or services, as that may breach applicable laws and regulations. If such inappropriate content is published, you must immediately notify the Quality Assurance Department.
- **Keep It Brief.** Limit your use of social media during work hours, even for sites devoted to professional development such as LinkedIn. Personal time online should never interfere with your job.

Professional Use: It is not permitted for an employee of the Company to act as a representative of the Company and/or to comment unless authorized to do so. Only members of the Company's Communications team and/or anyone who has been properly authorized by the Communications team are permitted to engage in social media, in defined contexts, as a spokesman of the Company.

Other requirements with regards to the use of the company social media:

- We must avoid making any social media communications that could damage our Principals' business interests or reputation, even indirectly.
- We do not engage in any conduct that would violate any applicable laws or regulations, our Principals' policies, the VHP policies or this Code of Conduct.
- We are not authorized to speak to the media on behalf of our Principals.
- Any posting about our products on a social media platform may be considered advertising. As we work in a highly regulated industry, we should know the following:
 - We are not authorized to make any false or misleading statements about any product.

- We are not authorized to promote the product in an off-label manner, i.e., do not make claims that are not covered by the approved indication.
- We do not create our own posts with product brand names or images clearly showing a Principal's product.
- Recognize the privacy and confidentiality of customers and patients/consumers. We do not post photographs/videos/testimonials of patients/customers/consumers on any social platform, including private/closed groups. Please adhere to all data privacy requirements.
- We do not cite or reference customers and patients/consumers, or company suppliers without their written approval.
- We do not post any company information especially that states on it "internal use only" or "company confidential" without prior approval by the Quality Assurance Manager.
- Always be fair and courteous to our colleagues, customers, suppliers, principals. We do not use statements, photographs, video or audio that could be viewed as malicious, obscene, threatening or intimidating, that disparage customers, employees, suppliers, Principals or that might constitute harassment or bullying.
- We do not post any misleading and malicious information about competitive products.
- If we become aware that any information or comments, we have posted are incorrect or violate these guidelines, they must be removed or edited immediately.

We are obligated to comply with the policy of the Company in respect of social media. If we are disregarding this policy and/or neglect and/or are indifferent to its compliance, the Company has the right to suspend the employment and take disciplinary action against them including their termination.

5.7. Security, IT, Access Control

Information systems are a fundamental way of supporting the pursuit of innovation and excellence in terms of quality of products and services for Customers and Consumers. VHP strongly supports the importance of establishing, together with the Employees, the Customers and the Stakeholders, an open, constructive and transparent dialogue while at the same time seizing opportunities related to social media, as well as through more traditional media. VHP expressly prohibits any use of information systems, email or social networks that violate applicable laws or that may be an offence to individual freedom, reputation or the dignity of Persons, especially minors, or that may entail unauthorized interference with or harm to the information system of any third party.

At VHP, we recognize the critical importance of maintaining robust IT security measures to safeguard our information assets, data, and systems. We also understand the potential risks associated with cyber threats and the need to protect sensitive information. This IT Security clause outlines our commitment to IT security and the responsibilities of all employees and stakeholders:

Compliance with IT Security Policy: All employees and stakeholders must adhere to the company's IT security policy, which has been developed by the appointed IT Officer and maintained as part of the company's Quality Management System. The policy sets out the guidelines and procedures for the secure use of IT resources, data protection, and mitigation of cyber risks.

Data Classification and Handling: Employees are required to classify data based on their sensitivity and importance. Confidential and sensitive information must be handled with the utmost care and protected through appropriate security measures, as specified in the IT security policy.

Access Control: Access to IT systems, databases, and sensitive information will be granted on a need-to-know basis. Employees must use their assigned credentials responsibly and not share them with unauthorized individuals.

Password Security: All employees must create strong and unique passwords for their accounts, and passwords should be regularly updated. The sharing of passwords, writing them down, or using easily guessable passwords is strictly prohibited.

Security Awareness Training: The company will provide regular security awareness training to all employees to educate them about common cyber threats, phishing attempts, and best practices for ensuring IT security.

Reporting Security Incidents: Employees are responsible for promptly reporting any suspected security incidents, such as data breaches, malware infections, or unauthorized access attempts, to the IT Officer.

Secure Device Usage: All company-issued and personal devices used for work purposes must adhere to the company's IT security policy. This includes ensuring that devices are protected with appropriate security measures.

Data Backup and Recovery: Regular data backups will be conducted as per the established procedure to ensure data availability in the event of data loss or system failures. Employees should follow data backup procedures diligently.

Software and Patch Management: All software and applications used within the company must be licensed and kept up-to-date with the latest security patches and updates to minimize vulnerabilities.

Use of External Devices and Networks: The use of personal external devices, such as USB drives, on company systems is subject to approval and adherence to the company's IT security policy. Employees must exercise caution when connecting to external networks and public Wi-Fi.

Physical Security: Physical access to IT infrastructure, servers, and data centers is restricted and monitored to prevent unauthorized access.

Consequences of Non-Compliance: Failure to comply with the IT security policy and IT related procedures and the guidelines outlined in this clause may result in disciplinary action, up to and including termination, depending on the severity and frequency of the violation.

Each employee and stakeholder play a critical role in safeguarding our IT infrastructure and data.

6.0 Marketplace

6.1. Adverse Events and Product Quality Complaints

At VHP, we prioritize the safety and quality of the products we distribute. As an authorized and contracted distributor for multinational companies, we recognize the utmost importance of promptly addressing adverse events and product quality complaints to protect the health, safety, and satisfaction of our customers and end-users. This clause outlines our responsibilities and procedures for handling adverse events and product quality complaints:

Reporting Adverse Events: All employees and stakeholders are required to promptly report any adverse events or incidents related to the use or consumption of the products we distribute. Adverse events refer to any unintended and undesirable effects resulting from the use of products.

Handling Product Quality Complaints: We actively encourage our customers and end-users to report any concerns or complaints related to product quality. These may include issues with product efficacy, packaging defects, labeling discrepancies, or any other matters pertaining to product quality.

Designated Point of Contact: To streamline the process, we have a designated PV department to handle adverse events and a Quality Assurance department to handle product quality complaints.

Timely Reporting and Documentation: All adverse events and product quality complaints will be promptly reported, recorded, and documented.

Investigation and Root Cause Analysis: Upon receipt of an adverse event or product quality complaint, we will inform the respective supplier in order to conduct a comprehensive investigation and root cause analysis to identify the underlying issue.

Customer Communication: We will keep our customers and end-users informed of the actions taken in response to their adverse event reports or product quality complaints, ensuring transparency and accountability.

Confidentiality and Non-Retaliation: We will handle all adverse event and product quality complaint information with the utmost confidentiality. Moreover, we will protect and support individuals who report adverse events or product quality complaints in good faith, ensuring that there will be no retaliation.

By including this Adverse Events and Product Quality Complaints clause in our code of conduct, we reiterate our dedication to ensuring product safety, quality, and customer satisfaction. We aim to uphold this commitment through proactive reporting, prompt investigations, and efficient corrective measures. By doing so, we endeavor to preserve the trust and confidence of our valued customers, our partners, and regulatory authorities in our distribution of our products.

6.2. Conflict of Interest

A conflict of interest occurs when a person's private interest interferes or appears to interfere in any way with its ability to fulfill its job responsibilities and with VHP interests and may also arise when the Company, employee, director, or a member of his or her family receives improper benefits because of his or her position within VHP. These situations include, but are not limited to, relationships with government officials, health care professionals, health care organizations, physician owned companies, or any other situation where it may appear that company decisions can be influenced by personal interests or relationships. You should avoid a conflict, or an appearance of a conflict, between your personal interests, your official responsibilities and your Company's interests. Any potential conflict of interest should be declared.

Our company is committed to avoiding conflicts of interest. Employees, officers, and director must avoid any situation in which their personal interests conflict with the interests of our company or could influence their decision-making.

6.3. Gifts, Meals and Entertainment

VHP is committed to avoiding any appearance of impropriety in our business relationships. Employees, officers, and director must not offer, give, or receive any gift, meal, or entertainment that could be seen as influencing business decisions. Providing gifts to Governmental Officials is prohibited. VHP is committed to comply with its Anti-bribery and Anti-corruption policy, therefore the following should be followed by all VHP employees:

We do not accept nor ask for gifts, meals or entertainment in exchange for doing, or promising to do, anything for a customer, supplier, or other business partner.

We must not accept gifts of cash or cash equivalents, such as gift cards, under any circumstances.

We do not accept any lavish gifts, meals or entertainment.

Gifts of symbolic value, such as trophies and statues that are inscribed in recognition of a business relationship, may be accepted.

If you are offered a gift, meal or entertainment that exceeds the guidelines noted above, politely decline and explain the Company's rules. If returning a gift would offend the giver, or the circumstances under which it was given prevent its return, you should notify your Health Care Compliance Officer.

6.4. Fair Dealing

All employees will deal with VHP's customers, suppliers, competitors and independent auditors in a fair and transparent way and will not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information or misrepresentation of facts. Even the perception of unlawful conduct should be avoided, including inappropriately disclosing pricing, costs, production, products and services,

bidding practices and other nonpublic business matters.

Tenders require a transparent, fair and equal bidding process. VHP must not collaborate with a tendering authority in the creation or interpretation of tender materials or documentation in a way which could compromise fairness of the process.

Our procedures ensure that all business activities across the organization are to be carried out in compliance with applicable local anticorruption and competition laws, KEFEA Code of Conduct and Health Care Business Integrity guidelines at all times. We acknowledge the importance of fair competition and expect the same of contract organizations acting on our behalf.

We are committed to competing vigorously in the marketplace in a fair and compliant manner, and to earning our business success on the merits of our products and services, excellent customer service, and competitive prices. This means we present our products, services, and sales programs in a clear, honest, and forthright manner, and we do not engage in or tolerate unfair methods of competition, including unfair or deceptive practices.

6.5. Educational and Promotional Activities

VHP will represent and promote its products and services accurately and will comply with applicable regulatory and legal requirements as well as applicable industry codes including European Federation of Pharmaceutical Industries and Associations (EFPIA) Code of Practice, Cyprus Association of Research and Development of Pharmaceutical Companies (KEFEA) Code of Practice, Eucomed, MedTech Europe Code of Ethical Business Practice and Cyprus Association of Representatives of Medical and Scientific Equipment (SAIEEK) Code of Ethical Business Practice governing the marketing and sale of products and services. VHP will also comply with its Principals' Codes of Conduct. Our educational and promotional activities and materials conform to high ethical and scientific standards according to the business area. They are legal, evidence based and industry-compliant and we always follow the strictest requirement. We put consumers' and customers' safety first, provide them with clear, up-to-date information and promote our products appropriately and ethically.

6.6. Anti-bribery and anti-corruption

VHP's Anti-Bribery and Anti-Corruption policy is issued pursuant to and reflects compliance with the requirements and/or obligations and/or duties introduced by the Prevention of Corruption Law (Cap 161 of 1920), the Civil Servants Law of 1/1990 (Sections 69 & 70), the Criminal Code (Cap 154-Sections 100-103, 105, 118), the Law Ratifying the Criminal Law Convention on Corruption (Law 23(III) of 2000) and the Law 22(III) of 2006 which transposes the provisions of the Criminal Law Convention on Corruption 1999, of the Republic of Cyprus as amended and replaced from time to time, by the US Foreign Corrupt Practices Act, the UK Bribery Act, the OECD Anti-Bribery Convention as well as by the Company's Contractual Agreements with its Business Partners.

All forms of bribery and corruption are prohibited. Any breach of this policy or local and foreign laws could result in disciplinary action being taken and ultimately could result in dismissal. Bribery is prohibited when

dealing with individuals who work either in the public or private sector and the provisions of this policy are of general application.

ANTI BRIBERY AND ANTI CORRUPTION POLICY STATEMENT

VARNAVAS HADJIPANAYIS LTD (VHP) is committed to apply the highest standards of ethical conduct and integrity in its business activities. As part of this commitment, all forms of bribery and corruption are unacceptable and will not be tolerated.

We prohibit the offering, promising, giving, or authorizing, anyone to give anything of value directly or indirectly to or for anyone acting in an official capacity to influence any official act (or failure to act), or any decision in violation of his or its lawful duty; or induce the use of his or its influence to affect any governmental act or decision; or secure any improper advantage related to business.

All VHP employees are expected to understand the Standards and policies of our company, abide by them, and raise any questions or concerns that may have. They are also responsible for reporting any wrongdoing within VHP. If they know or suspect that a law has been broken or our Standards have been violated, they should report it promptly to either their manager, the Human Resource Department at hr@hadjipanayis.com.cy, or the Compliance Department at compliance@hadjipanayis.com.cy.

This policy has been adopted by the Management and is communicated to everyone involved to ensure their commitment to it. VHP applies a "zero tolerance" approach to acts of bribery by any of our employees or any business partners.

6.7. Competition Law

All business activities across VHP must be carried out in compliance with applicable competition regulations ensuring fair competition, honesty, integrity and fairness, and aligned with the legitimate interests of our Customers, Suppliers, Employees and of the Community in which the company operates.

VHP acknowledges the importance of fair and vigorous competition, follows all competition laws and is committed to a free and competitive marketplace in order to ensure that we compete aggressively, but at the same time fairly, within the limits of legally acceptable business practices, and that we are protected from the consequences of non-compliance.

6.8. Public Procurement

Public bodies, such as government-run hospitals, are subject to local laws governing how they procure products and services. As a distributor of pharma, medical and diagnostic products to Health Authorities, we are also required to comply with these laws.

Employees who are involved in tender processes, or who offer to provide our products and services under a contractual agreement to a public authority, must understand and follow the rules of public procurement as well as the requirements of our internal procedures. These rules can be complex but are critically important to our business.

6.9. Recognizing Government Officials (GOs)

Government Officials in Cyprus are individuals who hold positions within the government or government regulatory entities, either as practicing Healthcare Professionals (HCPs) or non-practicing individuals. The definition includes the following categories:

Government Officials who may be HCPs but are not practicing as HCPs:

These individuals are encountered while working in governmental regulatory or similar entities, such as the Ministry of Health, Product and Pricing/Reimbursement regulators, and public hospitals. They represent themselves as government officials, which may include inspectors, auditors, investigators, elected officials, or employees of a government ministry or agency. Additionally, this category encompasses individuals who serve as agents or consultants to a government agency, or who are otherwise known or believed to fit into one of the aforementioned categories.

Government Officials practicing as HCPs:

This category comprises individuals who are both government officials and practicing Healthcare Professionals. It includes members of the Parliament of any Minister's cabinet, members of boards and commissions of the Minister of Health or any related agency, as well as those who serve as experts in Product Evaluation, Registration, Price, or Reimbursement Committees.

6.10. Relationship with Customers and Consumers (incl. interaction with HCPs, GOs, HCOs)

At VHP, our interactions with all of our customers, which include Health Care Professionals (HCPs), beauty stores, supermarkets, as well as consumers and health care organizations are of great importance. As a distributor of various categories of products, such as pharmaceuticals, medical devices, diagnostics, cosmetics, fragrances, food supplements, and food products in Cyprus, we strive to provide exceptional service and build strong relationships with all stakeholders. This Interacting with Customers, Consumers, and Health Care Organizations clause outlines the principles and guidelines for all employees and stakeholders:

Customer-Centric Approach: We adopt a customer-centric mindset in all interactions, ensuring that the needs and preferences of our customers and consumers are a top priority.

Professional Conduct: Interactions with all stakeholders must be conducted in a courteous, respectful, and professional manner, reflecting the values and reputation of VHP.

Product Knowledge and Information: Employees engaging with customers and consumers should possess comprehensive knowledge about the products we distribute. Accurate and up-to-date information should be provided to assist them in making informed decisions.

Transparency and Honesty: We prioritize honesty and transparency in all interactions. If there are any limitations, delays, or issues, employees should communicate this information promptly and truthfully, offering suitable alternatives or resolutions.

Data Privacy and Confidentiality: Information provided by customers, consumers, and health care organizations, including personal and business data, must be handled with great confidentiality and in compliance with applicable data protection laws. Employees should not disclose sensitive information to unauthorized individuals or entities.

Compliance with Regulations: Interactions must adhere to all relevant laws, regulations, and industry standards. Employees should be aware of and comply with the ethical guidelines governing interactions with health care professionals.

Handling Feedback and Complaints: We value feedback from all stakeholders and view complaints as opportunities for improvement. Employees should actively listen, acknowledge complaints promptly, and work towards resolving them fairly and accordingly.

Resolving Issues: Employees should possess the necessary authority and resources to address and resolve issues effectively. If necessary, they should escalate matters to the appropriate channels within the company to expedite resolution.

Maintaining Relationships: Building lasting relationships with all stakeholders is crucial to our success. Employees are encouraged to maintain regular communication and follow-up to foster loyalty and trust.

Our dedication to professional conduct, transparency, and continuous improvement strengthens our position as a reliable and respected distributor of our products.

Interacting With Health Care Professionals and Government Officials

Whenever interactions with Government Officials or Healthcare Professionals (HCPs) involve payments, meals, travel, or any other benefit to an HCP, VHP will ensure that the benefits are legal under all applicable laws and regulations, supported by a legitimate and documented business need, and allowed under the written agreement.

Any interactions with an HCP/GO must be supported by a legitimate, clearly defined business need and allowed under the written agreement. VHP may only engage HCP/GOs whose expertise and experience are aligned with the business need.

The benefits should not exceed what is necessary to conduct the interaction and must never be given as a reward for business or as a condition for future sales or referrals. When interacting with HCPs and GOs, be aware of “red flags” that may be evidence of potential corruption. For example, an HCP and/or GO:

- Proposes linking payments to volume of purchases
- Mentions personal relationships with government entity/official
- Has a questionable reputation

- Guarantees you success in a public tender or bidding contract
- Requests payments outside his/her country
- Declines to provide proper receipts for expenses

All financial interactions with HCP/GOs must be consistent with relevant agreements, and compensation for these interactions must be reasonable for the Cyprus market. In all interactions, VHP prioritizes the following principles:

Patient safety: Making sure that all interactions and collaborations contribute to the safety and well-being of patients and the general public.

Scientific integrity: All interactions are based on accurate scientific information, evidence-based medicine, and ethical research practices.

Transparency: Financial relationships, potential conflicts of interest, and the purpose of interactions are disclosed accordingly to maintain transparency and trust.

Ethical considerations: Ethical standards that prevent undue influence, conflicts of interest, and actions that compromise the integrity of healthcare decisions are maintained at all times.

Regulatory compliance: Adherence to all relevant laws, regulations, and industry codes of conduct governing interactions with healthcare professionals and government officials.

6.11. Relationship with stakeholders/ Principals

Our relationship with our principals, is integral to our business operations. We are committed to upholding the highest standards of conduct and professionalism in all interactions with our valued Principals.

Mutual Respect and Trust: We approach our relationship with Principals with mutual respect and trust, recognizing the value they bring to our distribution business.

Adherence to Contractual Obligations: We honor all contractual agreements with Principals and fulfill our obligations in a timely and diligent manner.

Transparency and Open Communication: We maintain transparent and open communication channels with Principals, ensuring that relevant information is shared promptly and accurately.

Confidentiality and Intellectual Property Protection: We respect the confidentiality of information provided by Principals and uphold the protection of their intellectual property rights.

Compliance with Laws and Regulations: Our interactions with Principals strictly adhere to all applicable laws, regulations, and industry standards.

Avoidance of Conflicts of Interest: Employees and representatives are required to avoid conflicts of interest that may compromise our commitment to Principals' best interests.

Performance and Accountability: We are committed to achieving performance excellence in distributing and promoting the products provided by our Principals and being accountable for the quality of our services.

Continuous Improvement: We seek the feedback from our principals and use it to continuously improve our operations and distribution processes.

Prompt Resolutions: In case of disputes or disagreements with Principals, we endeavor to resolve them promptly and amicably through open dialogue and effective mediation mechanisms.

Fair Business Practices: Our dealings with Principals are conducted fairly and ethically, ensuring that our business practices align with industry norms and best practices.

Compliance with Distribution Agreements: We adhere to the terms and conditions of distribution agreements with Principals, ensuring that all parties understand and fulfill their roles and responsibilities.

Collaboration and Partnership: We view our relationship with Principals as a partnership based on collaboration and shared objectives, working together to achieve mutual success.

6.12. Disclosure of Transfer of Value and Disclosure Code

We are firmly committed to upholding transparency and accountability in our business practices, particularly in documenting and disclosing all Transfer of Value (ToV) transactions, whether they are made directly or indirectly, to or for the benefit of recipients. Our reports will be timely, accurate, and complete, following the guidelines set forth by the National Code of the country (KEFEA).

For Transfers of Value to Health Care Organizations (HCOs), we ensure compliance with the following categories:

Contribution to Costs Related to Events: This includes sponsorship of Health Care Professionals (HCPs) directly or through HCOs to attend events, such as registration fees, sponsorship agreements with HCOs, or with third parties appointed by an HCO to manage an event, as well as travel and accommodation expenses.

Fees for Service and Consultancy: Transfers of Value resulting from or related to contracts between a KEFEA member and institutions, organizations, or associations of HCPs, where such entities provide any type of services to a KEFEA member.

For Transfers of Value to individual Health Care Professionals (HCPs), we ensure compliance with the following categories:

Contribution to Costs Related to Events: This includes covering registration fees, travel and accommodation expenses for HCPs attending events.

Fees for Service and Consultancy: Transfers of Value resulting from or related to contracts between our company and HCPs, under which HCPs provide any type of services to VHP (i.e., speakers at Company Organized or Third-party Organized Events) or any other form of funding not covered in the previous

categories. We will disclose fees and expenses as separate amounts, clearly distinguishing between them in written agreements.

These disclosure practices reflect our commitment to transparency and integrity in all interactions with our stakeholders, ensuring that we operate in compliance with the relevant regulations and maintain the highest standards of ethical conduct.

6.13. Financial Integrity/ Accurate Books and Records

Improper Payments

Improper payments are considered unlawful or with a corrupt intent.

Payments in cash or any kind or in the form of anything of value to government officials with the purpose of obtaining an improper business advantage are considered inappropriate and hence, are prohibited.

Improper payments can also be payments of low value intended to expedite or facilitate routine bureaucratic processes.

Recording Information

VHP shall timely and in reasonable detail document and report all relevant information completely and accurately in the books, records and accounts.

Good record keeping helps us protect personal information and intellectual property, comply with legal, financial and regulatory requirements, and avoid unnecessary costs. All records and information are kept only for the necessary period to meet regulatory and business requirements.

We maintain data integrity by making sure that information is accurate and stored correctly – essential, given much of our work relies on having robust data and information. As well as meeting legal and regulatory requirements it means we have accurate information when making decisions about our products, our patients and our people.

When it comes to creating and managing documents, we adhere to the relevant company procedures for making entries and corrections in company books and records. We ensure that expense reports are accurately and promptly recorded and submitted. We do not make payments, seek reimbursements, or approve expenditures that lack sufficient description or documentation, are not related to legitimate services, contradict the terms of the associated contract, or appear to be improper.

Furthermore, we refrain from making, facilitating the creation of, or neglecting to correct or report any false, misleading, or artificial entries, and we do not attempt to conceal information in books or records. Our commitment is to maintain transparency, accuracy, and compliance in all document-related activities to uphold the highest standards of ethical conduct within the organization.

We retain official company records for the time period required by our records retention policy, which is in alignment with local legal requirements.

7.0 Society

7.1. Corporate Social Responsibility

We acknowledge the importance of social responsibility and are committed to giving back to the communities we serve. As part of our corporate social responsibility (CSR) initiatives, we actively engage in charitable activities and donations.

CSR Committee: A dedicated CSR Committee, representing various departments, is responsible for overseeing, planning, and executing our charitable activities and donations.

Aligned with Our Values: Our charitable efforts are aligned with our core values, business objectives, and the needs of the communities in which we operate.

Community Engagement: We actively collaborate with local communities to understand their unique needs and challenges, ensuring our CSR initiatives have a meaningful and sustainable impact.

Transparency and Accountability: Our charitable activities and donations are conducted with transparency and accountability. Comprehensive records of contributions and their allocation are maintained and available to stakeholders upon request.

Focus Areas: We prioritize charitable efforts in areas such as education, healthcare, environmental conservation, poverty alleviation, and other social causes that align with our values and expertise.

Empowering Employees: We encourage employee participation in volunteer activities and community engagement. Employee-driven initiatives that align with our CSR goals are supported and recognized.

Ethical Giving: Our charitable activities and donations strictly adhere to ethical principles, and we refrain from supporting organizations or causes involved in illegal activities, discrimination, or harm to society.

Public Recognition: Where appropriate, we publicly acknowledge and recognize the contributions and efforts of our employees and partners in our charitable endeavors.

Following the principles outlined above, we demonstrate our unwavering commitment to creating a positive impact in the lives of others and contributing to the well-being of our communities. Upholding ethical giving and community engagement, we solidify our position as a socially responsible company, fostering goodwill and trust among our stakeholders and the broader society.

8.0 Environment

VHP is committed to managing and developing its business in a sustainable manner. Moreover, we recognize the vital importance of environmental protection and are dedicated to minimizing our environmental impact.

Compliance with Environmental Laws and Regulations: We will strictly adhere to all applicable local environmental laws, regulations, and standards. This includes obtaining and maintaining all necessary permits and certificates related to our distribution activities.

Resource Conservation: We are committed to the responsible use of natural resources, such as water and energy, in our operations. Employees are encouraged to adopt practices that conserve resources and minimize waste generation.

Waste Management: We implement effective waste management practices to reduce, reuse, and recycle waste materials generated during our distribution processes. Proper disposal of hazardous waste will be carried out in compliance with relevant environmental regulations.

Transportation Efficiency: We will strive to optimize our transportation practices to reduce greenhouse gas emissions and air pollution. Where possible, we will explore eco-friendly transportation options and promote efficient logistics. Our delivery vehicles as well as the vehicles used by the sales departments are properly maintained and repaired if needed and regularly checked.

Environmental Awareness and Training: We will provide environmental awareness and training programs to our employees to promote a culture of environmental responsibility and encourage sustainable behaviors.

Continuous Improvement: We are dedicated to continuous improvement in our environmental performance. Periodic assessments and audits will be conducted to identify areas for enhancement and the implementation of sustainable practices.

Community Engagement: We will actively engage with local communities to raise awareness of environmental issues and support initiatives that contribute to environmental conservation and protection.

VHP is dedicated to environmental stewardship as an essential part of our business. Through responsible practices and sustainable approaches, we aim to contribute positively to the environment, while maintaining our status as a reputable and environmentally-conscious distributor in Cyprus.

9.0 Reporting Violations (How to Speak Up)

Our company is committed to maintaining an environment in which employees, officers, and directors can report illegal or unethical conduct without fear of retaliation. We encourage all employees, officers, and directors to report any suspected violations of this Code of Conduct or applicable laws or regulations.

We are each accountable for speaking up if we have a concern, or see something that's not in line with our values and expectations. The first step is to speak with a line manager or if that's not possible, contact the Compliance Officer or the Human Resources Manager.

If you feel unable or uncomfortable discussing an issue with your manager, the Human Resources Manager or the Compliance Officer, you can use the anonymous reporting channels. You can report anonymously any violation of the Code of Conduct either through the complaint box which is located in printing area on the 2nd floor and is checked by the Human Recourses Manager on a weekly basis or via the 'VHP Suggestion Box' in the company's intranet.

Managers also have a duty to raise any concerns brought to their attention. Those who ignore violations, or who fail to detect or correct them, could face disciplinary action. Remember, by speaking up and raising concerns, you are living our values and expectations and doing the right thing.

Once a report is received, the responsible person will conduct an investigation to determine the nature, scope and duration of wrongdoing, if any. If the allegations are substantiated, a plan for corrective actions will be developed. Appropriate corrective actions may include notifying an appropriate governmental department, disciplinary action of making changes to policies and procedures to prevent future occurrences.

The reports will be treated with discretion and confidentiality, and no retaliation will occur against those who report in good faith. If any employee feels that they have been retaliated against, the employee should report it immediately.

Contact Details

Department/Committee	Responsible Person	Email	Phone No.
Human Resources	Human Resources Manager	hr@hadjipanayis.com.cy	22207744
Corporate Social Responsibility (CSR)	Human Resources Manager	csr@hadjipanayis.com.cy	22207744
Data Protection	Data Protection Officer	dpo@hadjipanayis.com.cy	22207740
Health and Safety	Health and Safety Officer	healthandsafety@hadjipanayis.com.cy	22207740
Health Care Compliance	Health Care Compliance Officer	compliance@hadjipanayis.com.cy	22207740
IT	IT Officer	it@hadjipanayis.com.cy	22207717
Communication Team*	Human Resources Manager	crossidou@hadjipanayis.com.cy	22207744

*The members of the communication team are: Managing Director, Human Resources Manager, Health Care Compliance Officer, Data Protection Officer.

10.0 Conclusion

Our company's success is built on a foundation of ethical and compliant business practices. We expect all employees, officers, directors and applicable third-parties to embrace this Code of Conduct and to conduct themselves in accordance with its principles. Failure to comply with this Code may result in disciplinary action, up to and including termination of employment or termination of business relationships.