



# Global Code of Conduct

LEAD BY EXAMPLE

# Index

---

**1/ Introduction 4**

1. Purpose and Scope
2. Our Responsibilities

---

**2/ Reporting violations & non-retaliation 6**

---

**3/ Healthcare community 7**

1. Government Inspections and Audits
2. Operating Compliance (GxP)
3. Drug Safety
4. Interactions with the Healthcare Community
5. Promotional Activities
6. Scientific Exchanges

---

**4/ Interactions with third parties 14**

1. Antitrust and Unfair Competition
2. Anti-Bribery and Anti-Corruption
3. Pricing and Price Reporting

---

**5/ Employee Due Diligence 16**

1. Conflicts of Interest
2. Data Protection
3. Accurate Books and Records

---

**6/ Intellectual property and confidential information 19**

1. Protection of Copyrights and Forgery of Identification Mechanisms or Distinctive Marks
2. Intellectual Property and Confidential Information

---

**7/ Work environment 21**

1. Nondiscrimination and a Harassment-Free Workplace
2. Protection against Human Trafficking
3. Environmental Protection
4. Use of IT Systems
5. Respect for Health and Safety at Work
6. Social Media

---

**8/ Disciplinary actions 24**

# 1/ Introduction

## 1. Purpose and Scope

Our Code defines the principles and rules that guide Dompé's conduct and relationships with all stakeholders.

It is a self-regulating Code aimed at making our business transparent and in compliance with applicable laws, rules and Company policies.

This Code applies to directors, managers, employees, representatives, suppliers, partners and third parties that act on behalf of Dompé. It also applies to all of Dompé's legal entities, locations, affiliates, and subsidiaries.

In the event this Code conflicts with any laws or regulations relevant to Dompé and/or its affiliates, the latter shall take precedence.

## 2. Our Responsibilities

Our Code, together with company policies, gives us the information to perform our job ethically and to protect the Company's reputation by establishing business relationships based on mutual trust.

It is our responsibility to know and comply with the laws, Company policies and this Code, as inspired by the following four **Principles Guiding Business Conduct**:



### Compliance

We follow the rules.



### Integrity

We are inspired by honesty.



### Transparency

We are transparent in all decisions and actions.



### Respect

We trust and respect each other.



# 1/Introduction

Every time we make a decision,  
we should ask ourselves:

- Is it compliant with applicable laws and standards?
- Is it aligned with the highest ethical principles?
- Do I feel comfortable sharing this information (e.g., media test)?
- Am I behaving respectfully towards others?

Each manager has the following additional responsibilities:

- Foster a culture of compliance.
- Guide staff, consultants, contract workers, secondees, temporary staff, and vendors to act in a consistent manner with this Code and the policies that apply to them.
- Ensure that your collaborators complete all corporate and job-specific compliance training.
- Promote an environment where everyone feels free and safe in raising concerns and reporting possible violations of laws and internal policies.



# 2/ Reporting violations & non-retaliation

You play an important role in fulfilling our principles and enhancing our culture. When issues are raised or problems are reported, we look into the matter, taking prompt and appropriate action, and making corrections.

Accordingly, you are encouraged to report or raise concerns about potential misconduct and violations of compliance policies or applicable laws, rules, and regulations that may impact Dompé.

All reports of misconduct **will be treated confidentially** to the fullest extent permitted by applicable law, unless the reporter himself or herself agrees to disclose them or if the person accused is already aware of them.

**Furthermore, Dompé does not tolerate intimidation or retaliation against anyone who reports a compliance concern in good faith or assists with an investigation.**

**Anyone who engages in retaliation will face disciplinary action, which could include termination of employment/ agreement.**

Learn more about how to make a compliance report consulting our website

[Ethics & Compliance](#)



# 3/ Healthcare community

## 1. Government Inspections and Audits

Pharmaceutical companies are globally regulated by many government agencies. Therefore, Dompé activities are subject to periodic reviews. We have an established history of working in full cooperation with governments and regulatory bodies around the world and welcome outside government inspectors as partners in ensuring quality.

When being audited by external or internal auditors, all Dompé staff, collaborators, and third parties under audit should adhere to the following:

- **Purpose of Audit**  
The purpose of an audit is to improve the system and the processes; it is not an investigation.
- **Reply/submit on time**  
Submit the requested documents on time and promptly reply to any queries received to prevent an unnecessary delay in the process.
- **Be honest**  
Give true, accurate, and complete information.



### 3/Healthcare community

#### 2. Operating Compliance (GxP)

Our mission is to ensure that the pharmaceutical ingredients, medicines and medical devices produced directly and indirectly by Dompé comply with relevant requirements and that they are developed, manufactured, tested and released according to the cGMP requirements.

Our aim is to bring effective and safe therapeutic solutions to the market. In accordance with this mission, we follow all applicable regulations, including:

- **Good Laboratory Practices (GLP)**
- **Good Distribution Practices (GDP)**
- **Good Manufacturing Practices (GMP)**
- **Good Pharmacovigilance Practices (GVP)**
- **Good Clinical Practices (GCP)**

**collectively known as “GxP”**. To ensure compliance with GxP, we have adopted an internal quality and control system for all GxP areas.



#### It is your responsibility to:

- Know and follow the relevant GxP policies and procedures.
- Ensure the compliance of GxP processes with GxP and regulatory requirements.
- Participate in GxP training.
- Cooperate with all assessments and tests designed to ensure GxP compliance.
- Anyone employed by Dompé companies (including the Field Force), who receives or becomes aware of any product quality requirements, must immediately communicate this information to Dompé Quality Assurance by email: (qualitydistribution@dompe.com).
- Report any deviation from GxP and internal Dompé Quality Assurance policies and procedures. Propose CAPAs (Corrective and Preventive Actions) in case of deviation and non-compliance.
- Escalate GxP issues to management if you cannot resolve them.
- Cooperate during the regulatory inspections.



# 3/Healthcare community

## 3. Drug Safety

Dompé is committed to collecting and reviewing information regarding adverse events and other safety findings experienced by patients and trial subjects worldwide.

**Adverse events** and other safety findings are considered information to be reported within the Company, as defined in Dompé policies and procedures.

Dompé personnel should therefore report any of the above-mentioned events that come to their attention to the relevant Company department for ad hoc evaluation, processing, and management.

Adverse events that are considered having a plausible relationship with the product administered or used may be subject to regulatory reporting requirements to the concerned Regulatory Authority within specific deadlines; therefore, timely reporting within the Company is essential.

Safety information collected is evaluated on a case-by-case basis and periodically as aggregate data to detect safety signals and assess the benefit/risk profile of our products. The safety profile is monitored throughout the product's life cycle.

Whoever, among all personnel of Dompé companies (including the Field Force), receives or becomes aware of any Safety Information (adverse event or safety finding) should immediately convey such information to Dompé Global Drug Safety personnel via email (farmacovigilanza@dompe.com).

Whoever forwards such information should identify him or herself (name, position, department) and, if the reporter agreed, should provide reporter identification (name and contact details), to enable the Drug Safety personnel to contact him/her. Personnel from Dompé affiliates shall report to the Local Contact Person for Pharmacovigilance via dedicated mailbox. Dompé receptionists receiving phone calls or emails from healthcare professionals, patients, or consumers reporting safety information are trained to convey such information to Drug Safety.

As per applicable procedures, all Dompé personnel, including the Receptionist and Field Force, receive adequate training on pharmacovigilance and flow of safety information within the Company, including timeframes for forwarding such information to Global or Local Drug Safety.

The same process applies to safety information regarding medicinal products, medical devices, food supplements, and cosmetics.

For more detailed information please refer to **“Pharmacovigilance of authorized medicinal products collection, recording, processing and assessment of Individual Case Safety Reports at Global level.”**

**DOMPE-03740**



### 3/Healthcare community

#### 4. Interactions with the Healthcare Community

Relationships with members of the Healthcare Community (HCC) are critical to our mission of helping patients by developing innovative therapeutic solutions. Interactions with the HCC are subject to many laws around the globe. These laws restrict the economic benefits available to members of the HCC. They are sometimes referred to as anti-kickback and/or sponsorship laws. We comply with these requirements by ensuring that we never improperly influence members of the HCC when they make decisions about the use of our products.



All interactions between Dompé representatives and the HCC will be based on a legitimate business need.

**Dompé Representatives are strictly forbidden to engage in off-label promotion and may not:**

- Solicit or initiate inquiries from HCC members about Dompé products that require provision of off-label information.
- Promote a product before obtaining marketing authorization from the relevant regulatory authorities.
- Promote a product outside its licensed indications.



Interactions with the HCC will be reported and disclosed in accordance with applicable laws, regulations, and Dompé policies.

All arrangements with members of the HCC will be structured to comply with anti-bribery laws and must be defined in an agreement. The agreements must not constitute an offer, promise, or provision of a bribe by Dompé and should not give the appearance of offering, giving, receiving, or authorizing a bribe on behalf of Dompé.

**Nothing of value such as gifts, favors, hospitality, compensation or other monetary benefits may be offered or provided to:**

- Constitute an incentive to purchase, supply, administer, recommend, or prescribe any Dompé product.
- Influence regulatory or reimbursement decisions.
- Secure or retain business or secure an improper advantage.

All arrangements must be documented so that the purpose is clear to the parties and the suitability is transparent.

# 3/Healthcare community



## When interacting with the Healthcare Community:

- A legitimate need must be clearly identified.
- Never promise or provide anything of value for the purpose of encouraging or inducing purchase, prescription, supply, administration, or recommendation of our products (be aware that special country-specific rules may apply to samples and items of de minimis value).
- In case of compensation, the amount must be proportionate to the services provided and reflect fair market value.
- Collect and disclose any direct or indirect transfers of value, including payments consistent with applicable laws and regulations.
- All arrangements must be documented so that the purpose is clear to the parties and the suitability is transparent.

## Patient Advocacy

When permitted by laws and regulations, appropriate and effective collaboration between patients and Dompé provides the potential to co-create and co-develop better health outcomes. This collaboration must be based on **general principles** applicable to any contracted services: identification of a legitimate need, definition of the service required, signature of a written agreement, receipt of the deliverable(s), etc.

## When interacting with Patient Organizations (“PO”):

- Independence in terms of their political judgment, policies, and activities shall be assured.
- All partnerships shall be based on mutual respect, with the views and decisions of each partner having equal value.
- Dompé shall not request nor undertake the promotion of any medicine or medical advice.
- Dompé must safeguard the privacy of patient information.
- The objectives and scope of the interaction shall be transparent.
- Dompé will never require that it be the sole sponsor of a PO or any of its major programs.
- Written permission for the use of the PO logos or materials must be secured, and only approved materials may be used.
- Dompé shall not seek to influence editorial content to favor Dompé’s commercial interests.
- There must be a written agreement between the parties defining the relationship, expectations, and obligations of each.

For more detailed information, please refer to **Dompé’s “Global Policy on Anti-bribery and anti-corruption” – DOMPE-00309.**

**DOMPE-00309**

### 3/Healthcare community

#### 5. Promotional Activities

Promotional Information provided to the HCPs regarding Dompé products must be **truthful, complete, accurate, and not misleading.**

**Promotional activities** refer to any activity or material aimed at promoting or advertising, directly via Dompé representatives, distributed in meetings directed at healthcare professionals, including but not exclusive of the following:

- **Printed materials** such as booklets, medical journals, leaflets, and advertisements, providing sufficient and necessary information about a product.
- **Audio-visual materials** such as films, slides, video shoots, databanks, and electronic media including the Internet.
- **Publications of any type** that may be used as a source of information or reference, and the electronic access to such materials.

The Field Force is responsible for promoting, detailing, and marketing Dompé approved products consistent with all applicable policies, SOPs, and training.

#### Dompé is committed to:

- The principle that healthcare professionals should prescribe Dompé products only when their use is clinically appropriate.
- Compliance with legal requirements concerning the advertising and promotion of pharmaceutical products, including the communication of health economic information based on competent and reliable scientific evidence.

#### When promoting our products:

- Be fair and balanced in the presentation of risks and benefits and describe safety information accurately.
- Be consistent with approved labeling [e.g., Summary of Product Characteristics. (SmPC) or prescribing information (PI)], be officially approved and not altered in any way.
- Be directed only at those who have need for, or interest in, the particular information is reasonable.
- Do not engage in off-label promotion nor solicit enquiries about Dompé products that require the provision of off-label information.

More detailed information available on Dompé **“Global Policy on Interactions with Healthcare Professionals and Patient Organizations”**

**DOMPE-00315**



# 3/Healthcare community

## 6. Scientific Exchange

Scientific exchanges are the non-promotional interactions and exchanges of information between Dompé and healthcare professionals to advance scientific and medical understanding. Such exchanges must be non-promotional in intent, content, and nature.

### A “Scientific Exchange” refers to the:

- **Bona fide exchange** of medical and scientific information or data by Dompé Medical Affairs and R&D through a scientific dialogue that is conducted in a non-promotional context.
- Scientific Exchange includes, but is not limited to, disease awareness, publications, medical education, dialogue related to Dompé Clinical Studies or Investigator Initiated Research (IIR).
- Written and verbal responses to unsolicited questions or requests for information on unapproved products or indications from a healthcare professional or healthcare institution.

Scientific Exchange excludes the communication of Promotional Information.

### All Scientific Exchange interactions:

- Have a legitimate (“bona fide”) need.
- Have an intent that is clear, transparent, and non-promotional.
- Have the scale and responsiveness based on the scientific need.
- Are not and must not be perceived as being promotional or being designed to influence the prescription, supply, sale, or use of our medicines.



# 4/ Interactions with third parties

Dompé commits to managing business relationships with third parties (customers, suppliers, and partners) in a fair and professional manner, and in compliance with current regulations, agreed-upon quality and service standards, and existing contracts. During commercial negotiations, Dompé shall provide clear, accurate, and truthful information, which shall be reflected in the contractual obligations. Dompé also ensures third parties are qualified and undergo a due diligence process.

## 1. Antitrust and Unfair Competition

The free market and competition principles fall within the Dompé's fundamental values and are an integral part of its corporate culture. Dompé prohibits entering agreements with companies or other forms of conscious coordination with the objective or effect of preventing, restricting, or distorting competition. Examples of the above include understandings, agreements and/or practices agreed upon by companies, and decisions made by associations of companies (or other similar bodies).

The purpose of such agreements may include, but is not limited to:

- Prices (current and future), discount levels and conditions for obtaining these discounts, profit margins, payment terms, and other sales conditions.
- Market subdivisions (by assigning territorial areas, groups of products or customers, production quotas, etc.).
- Production and market outlet limitations.
- Exchanges of confidential marketing information.



## 4/ Interactions with third parties

It is also forbidden to adopt commercial strategies that constitute an abuse of one's own "dominant position," such as a financial condition that allows Dompé to control the market and thus hinder free competition. All Dompé employees must comply with antitrust regulations, the Antitrust Compliance Program, and the Code of Conduct in all their national and international commercial relations.

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### 2. Anti-Bribery and Anti-Corruption

Dompé is committed to the highest level of ethical business conduct, including compliance with applicable Anti-Bribery and Anti-Corruption laws and regulations.

At their core, these laws and regulations make it illegal to offer, pay, ask for, or receive anything of value in return for inappropriate advantages. This extends to third parties Dompé has engaged to support its business worldwide.

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### 3. Pricing and Price Reporting

Accurate and timely pricing information impacts governments, private payors, healthcare professionals, patients, and other stakeholders. It is also important to meet all requirements in accordance with applicable laws.

The jurisprudence in this area is complex and varies from country to country. Inaccurate pricing information and price reporting can expose Dompé to significant legal risks.



# 5/ Employee Due Diligence

## 1. Conflicts of Interest

A conflict of interest occurs when one's personal, social, financial, or political interests are placed before Dompé's interests.

A conflict of interest can damage not only an individual's own reputation but also that of Dompé. Many potential conflicts of interest can be resolved in a simple and mutually acceptable way.

Although Dompé respects the right to manage investments and does not intend to interfere with the private life of its employees, it is the responsibility of the employees to avoid situations that may present or give the impression that there is a conflict between their own interests and those of Dompé.

We make business decisions based on what is in the best interest of our Company and not for personal gain or benefit. We require all representatives to proactively and promptly disclose actual or perceived conflicts of interest.

**To avoid actual conflicts and minimize the possibility or appearance of conflicts of interest, we do not:**

- Seek or accept, directly or indirectly, payments, commissions, loans, or services from any person or Company as a condition or result of their doing business with Dompé.
- Accept gifts from any person or Company doing or seeking to do business with Dompé.
- Allow ourselves to be put in a position where there is - or appears to be - a conflict between our own interests and Dompé's interests.
- Do business on behalf of Dompé with a relative or a person with whom we have a close personal relationship. This includes negotiating, involving, or hiring such persons, or being involved in decisions relating to the employment or hiring of such persons.



# 5/Employee Due Diligence

## 2. Data Protection

Dompé implements the necessary organizational measures to protect personal data in compliance with the regulations in the countries in which it operates. Persons who have access to data relating to one or more individuals must process the data according to the instructions and procedures established by Dompé and according to local legal requirements.

Apart from employees or third parties who are responsible for processing this type of data, it is forbidden to record, disclose, or process the personal information of other employees or third parties. Dompé considers personal data an intangible asset. Before acquiring and processing the personal data of third parties, the Compliance Department must carry out a data privacy impact assessment.

### When managing Personal Data:

- Process it only for legitimate purposes, minimize it as much as possible, and share it only with authorized people/third parties.
- Comply with the specific Dompé policy, procedures, or applicable agreements with third parties involved (other Data Controllers, Joint Controllers and Data Processors).
- Implement appropriate technical and security measures to protect Personal Data from access, destruction, alteration, storage, or use.

Laws vary from country to country. For guidance related to your specific project or jurisdiction, please **contact Dompé's Data Privacy Officer (DPO) at [DPO@dompe.com](mailto:DPO@dompe.com)**



# 5/Employee Due Diligence

## 3. Accurate Books and Records

Maintaining accurate Company books and records is critical to ensuring our business is conducted legally, ethically, and transparently. Dompé complies with all applicable laws and regulations relating to the maintenance of records. As employees, we help create the books and records of the Company by accurately capturing our revenues, expenses, and payments in Dompé's systems, validating invoices from our vendors before paying them, and by never disguising a payment or activity as something it is not.

It is our responsibility to ensure that the Company records we create or approve are complete, accurate, and reliable, recorded in accordance with applicable legal or accounting principles, and supported by appropriate documentation. Undisclosed or unrecorded funds, payments, or receipts are inconsistent with our business practices and are prohibited. If you notice a mistake or an error in a record, please speak up, whether it is to your manager, Legal, Compliance, or through our website, [dompe.ethicspoint.com](http://dompe.ethicspoint.com).



# 6/ Intellectual property and confidential information

## 1. Protection of Copyrights and Forgery of Identification Mechanisms or Distinctive Marks

Dompé **protects intellectual property rights**, including therein, copyrights, patents, trademarks, trade secrets, know-how, and distinctive marks, in compliance with the policies and procedures and in observance of third-party intellectual property rights.

Dompé policies forbid the unauthorized reproduction of software, documentation, or other materials protected by copyright. In particular, the Company complies with restrictions specified in license agreements regarding the production/distribution of third-party products, or those stipulated with its software suppliers, and forbids the use or reproduction of software or documentation not permitted under the aforementioned license agreements.

***Dompé forbids conduct aimed at causing the loss, theft, unauthorized disclosure, or improper use of its intellectual property, third-party intellectual property or confidential information.*** For this purpose, the Company undertakes control mechanisms needed, both preventive and subsequent, guaranteeing compliance with copyright regulations, particularly in the management of scientific works and databases, as well as the protection of distinctive marks, such as trademarks and patents.

The Company also forbids the use of databases (extraction, reproduction of data, public disclosure, etc.) for purposes other than the ones for which they were intended and, in any case, for purposes not permitted by legislation on copyright protection.



# 6/ Intellectual property and confidential information

## 2. Intellectual Property and Confidential Information

Protecting our intellectual property is essential to maintaining our competitive advantage, so we have a duty to protect it.

- Keep complete and accurate records of your work, and promptly disclose inventions to management.
- Use Dompé confidential information only for valid business purposes and only disclose it to authorized individuals.
- Share confidential information outside of Dompé only with authorized parties who have signed a confidentiality agreement approved by Dompé's Legal Department.
- Do not discuss confidential information in public and take special care when using fax or email to ensure information is sent to the intended recipient.
- Continue to safeguard our confidential information after your employment or engagement with Dompé ends.
- Respect the intellectual property rights of others.



### Examples of intellectual property include non-public:

- Scientific and technical knowledge, know-how, and experience.
- Trade secrets, patents, trademarks and copyrights.
- Research and technical data and results of clinical trials.
- Manufacturing techniques.



### Examples of confidential information include non-public:

- Marketing plans, sales data, and business development opportunities
- Pricing information and strategies
- Customer lists and other information regarding Dompé customers



# 7/ Work environment

## 1. Nondiscrimination and a Harassment-Free Workplace

We recognize the fundamental value of human capital and diversity. Therefore, we strive to protect the physical and moral integrity of our people and strongly believe in the importance of giving equal opportunities, regardless of race, religion, skin color, gender, sexual orientation, marital status, disability, age, national origin, or any other Protected Characteristic legally protected under local legislation.

Dompé will not tolerate discrimination, harassment, or retaliation against employees, managers, supervisors, collaborators, or non-employees with whom we come into contact. Harassment may include unwelcome speech, behavior, or discrimination related to a Protected Characteristic.

The management and development of our resources is conducted using objective and documented evaluation criteria. We respect each other and strive to create a welcoming workplace where different thoughts, skills, and backgrounds co-exist in harmony.

## 2. Protection against Human Trafficking

Dompé is committed to a working environment free from human trafficking and slavery, which includes forced labor and illegal child labor. We will not tolerate or condone human trafficking or slavery anywhere in our global organization. We protect and promote human dignity and human rights in our business practices. Our employees, contractors, vendors, suppliers, partners, and others with whom Dompé conducts business must avoid complicity in any practice that constitutes human trafficking or slavery.



# 7/Work Environment

## 3. Environmental Protection

Dompé is committed to protecting the environment when it comes to its own operations and business relationships. Dompé recognizes that the inadequate management of such could lead to the occurrence of potentially impactful environmental, social, and economic events.

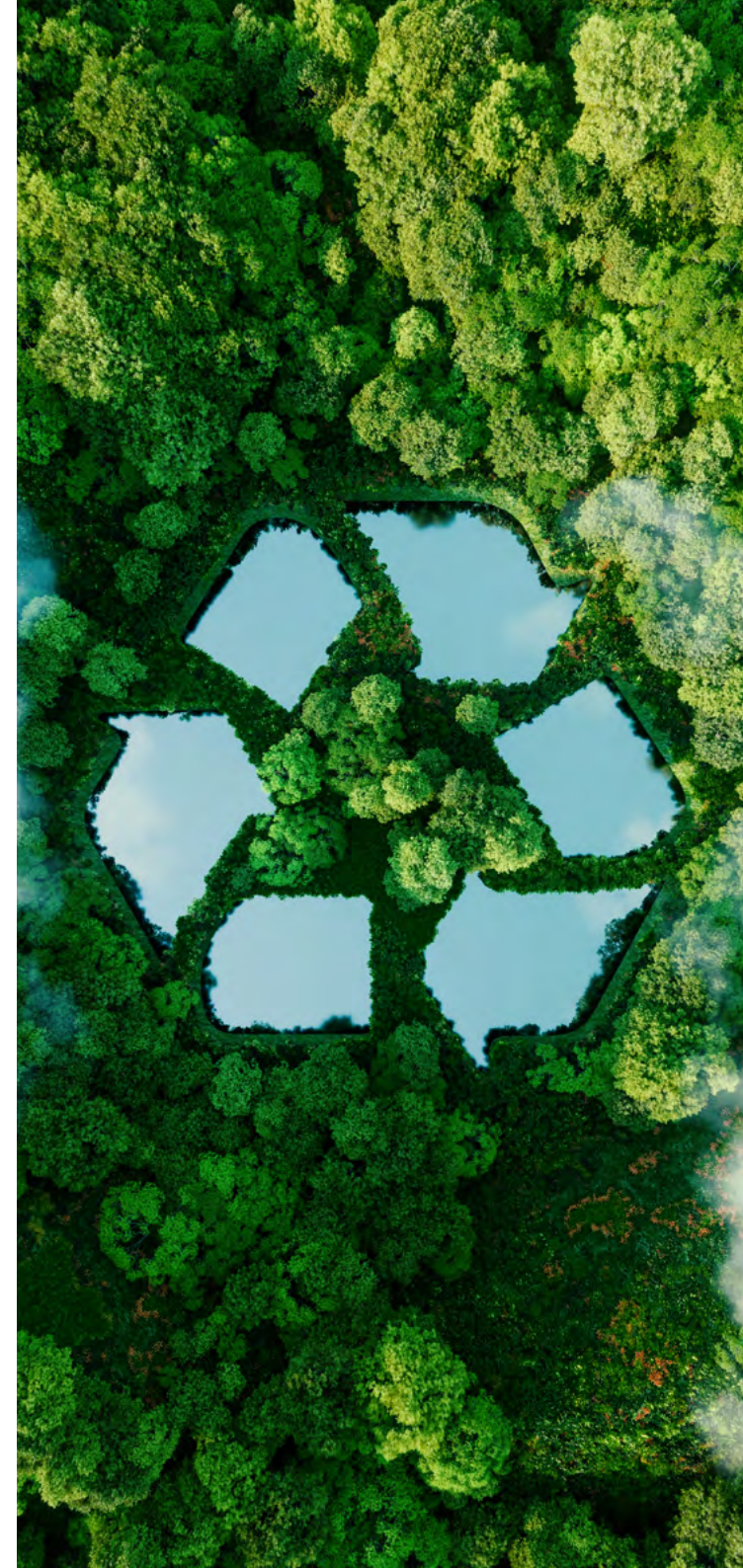
Therefore, the Group seeks to assess relevant risks and potential impacts to define and adopt strategies aimed at continuously improving our performance, focusing our efforts on the prevention of pollution and the treatment of related risks.

## 4. Use of IT Systems

Examples of IT systems at Dompé are computers, email, voicemail, instant messages, telephone records, networks, and internet access. Dompé's IT tools and systems are Company assets that are generally used for business purposes.

Each Dompé employee is responsible for protecting and conserving Company assets and resources and must use them in accordance with Dompé's interests, preventing improper use.

In general, and where permitted by law, no confidentiality or privacy can be guaranteed when using Company systems.



# 7/Work Environment

## 5. Respect for Health and Safety at Work

To safeguard the psychophysical integrity of the worker and to comply with local laws, Dompé aims to maintain the highest levels of health, safety, and hygiene protection for its employees, as well as guarantee the necessary prevention and protection measures to avoid or minimize professional risks.

All Dompé employees must personally contribute to promoting and maintaining a climate of mutual respect in the workplace.

Being under the influence of alcohol, narcotic substances, or substances of similar effect while working or in the workplace undermines these environmental characteristics.

It is prohibited to possess, consume, offer, or sell narcotic/alcoholic substances or substances of similar effect in any capacity, during work hours or in the workplace.

## 6. Social Media

Social media includes any digital communication channels that allow individuals to create and share content and post comments.

The use of social media for Dompé-related purposes must be respectful, proper, transparent, and compliant with the Company's social media policy.

### When using Social Media:

- Repost only Dompé information that has been approved for external sharing.
- Do not post anything online that states or implies that you are speaking on behalf of Dompé, unless you have been authorized to do so.
- Do not use social media for personal attacks, defamation, harassment, spam, offensive content, aggressive behavior, or illegal activities on Dompé and/or its products.
- Do not publish content that is illegal, obscene, defamatory, threatening, unlawful, disruptive, profane, harassing, or abusive.
- Do not use social media to make, recommend, or increase referrals to physicians.
- Any communication about Dompé, Dompé products, and/or survey compounds must be approved according to the promotional and non-promotional material review process



# 8/ Disciplinary actions

Dompé promotes a culture of responsibility for full compliance with Standards of Business Conduct. An important component of this culture is the proper enforcement and investigation of compliance standards through appropriate disciplinary action. Our disciplinary action policy establishes guidelines that Dompé will apply globally.

We take disciplinary action in response to violations of the Standards of Business Conduct. Effective disciplinary action is essential for a successful compliance program, and Dompé consistently takes appropriate disciplinary action throughout the Company. Consequently, intentional and material non-compliance carries significant penalties at Dompé. Sanctions

could range from verbal warnings to suspension, termination or other sanctions, as appropriate.

Disciplinary action is appropriate when a responsible employee's failure to identify a violation can be attributed to his or her negligence or reckless conduct.

Each situation should be considered on a case-by-case basis, taking into account all relevant factors, to determine the appropriate response. At Dompé, we are required to adhere to our Standards of Business Conduct. Failure to do so may lead to disciplinary action, up to and including termination of employment.

For more detailed information, please read Dompé's

**DOMPE-00314**

Compliance does not have to be complex if it is values-based. Integrity, Ethics, and doing the right thing goes beyond policies, laws, and regulations and will lead to the best decisions. Our Company's integrity is reflected in our code of conduct.

## At Dompé we are inspired by:



### Compliance

We follow the rules.



### Integrity

We are inspired by honesty.



### Transparency

We are transparent in all decisions and actions.



### Respect

We trust and respect each other.



