Code of Conduct

Grupo Allmed

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1. Introduction

Grupo Allmed, C.A. is a company engaged in the importation, storage, and distribution of pharmaceutical products in Venezuela, registered with the Directorate of Drugs, Medicines, and Cosmetics of the Autonomous Health Oversight Service of the Ministry of Popular Power for Health (MPPS).

Our business has a direct impact on public health. Therefore, all our operations must comply with the highest ethical, regulatory, and professional standards, as our greatest asset as a company is our reputation and our commitment to maintaining and safeguarding the cold chain in order to uphold the high quality standards of our products. This Code establishes the principles that guide the conduct of:

- Employees
- Executives
- Partners
- Contractors
- Suppliers
- Distributors
- Business Partners

Compliance with this Code is mandatory.

How do we operate?

We provide therapeutic solutions that help improve patients' lives by importing, storing, and distributing pharmaceutical products, contributing to the well-being and health of the population through a highly qualified workforce committed to excellence, quality, and integrity. We are all responsible for understanding how we apply this Code in our daily lives, work, decision-making, and the way we conduct business; we promote compliance with this Code by third parties with whom we interact. We promote and sell our products with honesty and integrity.

We work in accordance with our values of:

Commitment: We act responsibly toward our patients, customers, suppliers, and business partners.

Solidarity: We foster relationships based on respect and cooperation.

Excellence: We continually seek to improve our processes and services, maintaining high standards of quality and cold chain assurance.

Integrity: We act with honesty, transparency, and ethics in all our decisions and in the way we conduct business.

2. Regulatory and Legal Compliance

Allmed Group strictly complies with:

- **Venezuelan Health Regulations**
- **Regulations of the Ministry of Popular Power for Health (MPPS)**
- **Health Oversight Requirements**
- **Regulations for the Storage and Distribution of Medications**
- **Labor laws**
- **Applicable Anti-Corruption Laws**

All employees, members of senior management, partners, third parties acting on behalf of the company, suppliers, and business partners must comply with applicable laws in their activities.

Allmed Group's policies and procedures are designed to address as many of the legal and regulatory requirements governing our business as possible, including those related to: quality assurance, regulatory affairs, the cold chain, product and employee safety, interactions with third parties/suppliers, and Human Resources. These policies enable us to identify, correct, and prevent activities that do not comply with them.

3. Business Ethics and Integrity

All business decisions and the way we conduct business must be based on:

- Honesty
- Transparency
- Accountability
- Ethics

We are committed to maintaining accounting books, internal records, and documentation in a transparent and accurate manner. Our financial records must comply with the applicable accounting standards, laws, and regulations for each transaction.

The following behaviors are prohibited:

- Fraud
- Document forgery
- Manipulation of records
- Deceptive practices

4. Scope of the Code

This Allmed Code of Conduct addresses important topics such as compliance with regulations and laws, ethical business practices, quality and safety, pharmacovigilance, interactions with healthcare professionals, prevention of bribery and corruption, fair competition, gifts, meals, and hospitality with third parties, conflicts of interest, and other matters, with the goal of ensuring that all individuals involved act in accordance with our values, legal requirements, and industry standards.

This Code applies to:

- **All Grupo Allmed employees**
- **Members of senior management and partners**
- **Third parties acting on behalf of the company**
- **Suppliers and business partners**

Everyone must act in accordance with these principles.

5. Product Quality and Safety

The quality, safety, and cold chain of our products are our top priority.

Allmed Group is committed to:

- Distribute high-quality pharmaceutical products that are duly authorized, certified, and compliant with applicable regulations and laws.
- Ensure proper storage conditions
- Safeguard and support product traceability
- Preventing behavior that leads to deviations in processes that could call into question the quality of our service; to this end, we implement a training program covering all aspects of our Code of Conduct.

6. Pharmacovigilance

The company complies with the pharmacovigilance program established by the health authority.

Employees, healthcare professionals, patients, and any other person aware of an adverse event (AE), as well as the designated representative at Grupo Allmed, must immediately report:

- **Adverse Events**
- **Quality issues**
- **Unexpected reactions**
- **Therapeutic failure**
- **And any other reports related to the products we distribute.**

If a patient, friend, and/or acquaintance tells you they've experienced an adverse event related to medications or vaccines, what would you do?

We all have a duty to report any suspected adverse event as soon as possible to the product's distributor, medical professionals, or healthcare providers, providing all relevant information about the medication and the patient.

7. Interactions with Healthcare Professionals

Interactions with healthcare professionals must be conducted with transparency and respect.

It is prohibited to:

- Offer inappropriate incentives
- Influencing a healthcare professional's decisions
- Granting undue benefits

All activities conducted with healthcare professionals must have a legitimate purpose to promote continuing medical education.

During national or religious holidays, can we give healthcare professionals a "cultural courtesy"?

Cultural courtesies related to national or religious holidays are permitted; however, at Grupo Allmed, we maintain a list of approved courtesies. Please review which ones are permitted and the maximum amounts you may allocate for that purpose.

8. Prevention of Bribery and Corruption

We are governed by laws against bribery, corruption, and other fraudulent dealings; this makes it especially important for us to demonstrate our commitment to preventing improper influence in business transactions in all areas where we operate.

Allmed Group maintains a zero-tolerance policy toward bribery

and corruption. The following is prohibited:

- **Offering bribes**
- **Accepting improper payments**
- **Granting benefits to obtain commercial advantages**
- **Unfair competition practices**

We conduct due diligence before contracting with third parties, suppliers, and customers to thoroughly assess the company's actual situation and minimize risks before engaging in any commercial or transactional activity.

What constitutes something of "value"?

Improper benefits can take many forms, including cash, gift cards, gifts, travel expenses, entertainment, sponsorships, bogus consulting agreements, employment opportunities, inflated commissions, unauthorized rebates or discounts, and donations, among others.

If you have any questions, contact the Compliance Office or your

9. Fair Competition

We ensure that any interaction with competitors is based on respect and conducted in an appropriate manner.

We do not engage in agreements or activities that unfairly restrict competition. It is important that you do not participate in any activity that could be considered anti-competitive; consult with the Compliance Office, your manager, or supervisor.

We must always exercise caution when interacting with competitors. You should not discuss business matters with competitors, such as prices, sales terms, business plans, marketing, costs, distribution capacity, or inventory.

Can I meet with competitors to review and discuss vaccine and/or product prices together?

No, you may not meet with competitors to talk about, discuss, or share prices and/or information.

If you find yourself in this situation, leave the area and report it to your manager or the Compliance Office.

10. Gifts, Meals, and Hospitality

Although anti-bribery guidelines prohibit benefits intended to secure commercial advantages, clear limits are established for medically useful items, cultural courtesies, and hospitality. To ensure they do not interfere with professional judgment, these must be:

- Modest
- Transparent
- Appropriate
- Pre-approved

They must not influence business decisions or the healthcare professional's judgment.

Can I invite a healthcare professional to a business lunch?

Yes, as long as the reason (purely business-related) is verified and the monetary limits established by the company are respected.

11. Conflict of Interest

A conflict of interest occurs when a person's personal interest may interfere with the proper performance of their duties and responsibilities, as they may derive a benefit for themselves or for a third party related to them.

Examples:

- **Hiring family members**
- **Business relationships with suppliers**
- **Personal benefits**

All conflicts of interest or potential conflicts of interest must be disclosed and reviewed on a case-by-case basis.

Is it okay to accept a job while working at Grupo Allmed?

The first thing you should do is talk to your manager. Once it has been determined that the job does not interfere with your duties at Grupo Allmed, it would not be considered a conflict of interest; otherwise, accepting such a job would be prohibited.

12. Confidential Information

This refers to information that must be protected and not disclosed without authorization, including personal, medical, and financial data, trade secrets, and any sensitive information provided in confidence. To safeguard this information, Grupo Allmed requires that all individuals with access to the company's sensitive information sign a confidentiality agreement.

Similarly, we respect the intellectual property rights of others, and we will not improperly obtain the use of confidential information.

Can I share Company information with friends or family members?

No, confidential information may only be shared with authorized individuals within the company or with third parties who have formal authorization. Sharing information outside the workplace can create legal and reputational risks.

13. Work Environment

We provide equal opportunities for all employees. We strive to ensure that everyone who works at Grupo Allmed feels welcome, supported, and inspired to succeed. Our respect for people is demonstrated in what we do and how we do it; it is essential to have a work environment built on:

- Diversity
- Respect
- Equality
- Inclusion
- Fair treatment

The following acts are prohibited:

- Discrimination
- Harassment
- Workplace violence

Occupational Safety

The company maintains safe working conditions in accordance with Venezuelan labor laws; to this end, employees must:

- Comply with safety regulations
- Report accidents

14. Social and Environmental Responsibility

Allmed Group is committed to ensuring social responsibility and minimizing our environmental impact. To this end, we operate responsibly with:

- The community
- The Environment
- Public Health

We strive to promote the well-being of society through our products and work. Communities thrive when they are healthy, which is why we maintain high quality standards for our services, products, and cold chain.

15. Reporting Irregularities and Concerns

The company promotes a culture of transparency and reporting concerns. We ask questions when decisions or actions related to our work are unclear, and we report any violations of this Code.

You can report:

- Violations of the Code
- Fraud
- Corruption
- Regulatory noncompliance
- Cold chain breaches
- Process Failures

Reports will be investigated confidentially.

All reports of potential violations of this Code will be taken seriously and handled appropriately through follow-up measures, such as investigation, remediation, and, when necessary, corrective actions to address each case and prevent recurrence. No one should conduct an independent investigation. We must all cooperate in such investigations and maintain their confidentiality. All reports of irregularities and concerns must be handled through the Compliance Office and Human Resources.

16. No Retaliation

Allmed Group prohibits retaliation against anyone who reports a concern in good faith.

17. Consequences of Noncompliance

A violation of the Allmed Group Code of Business Conduct may constitute a breach of the agreements of a collaborator, partner, supplier, distributor, business partner, or third party with whom we interact.

Noncompliance may result in:

- Disciplinary action
- Termination of contract
- Legal action

17. Resources

Departments to contact if you observe a violation, have a question, or a concern:

Manager or Supervisor – The best place to start is with your immediate manager or supervisor if you have questions about how our Code of Business Conduct applies to your specific job.

Compliance Office – If you have any concerns about a potential violation of the company's values and standards of conduct.

Finance – If your question concerns accounting, suppliers, or finance.

Regulatory Affairs, Pharmacovigilance (PV), and/or Quality Assurance – If you have questions about the quality and safety of our products.

Human Resources – For issues of any kind involving any employees, partners, and/or executives.

Marketing – If you have any questions regarding laws, regulations, and acceptable business practices.