

*MS*pharma



THE COMPASS
CODE OF CONDUCT

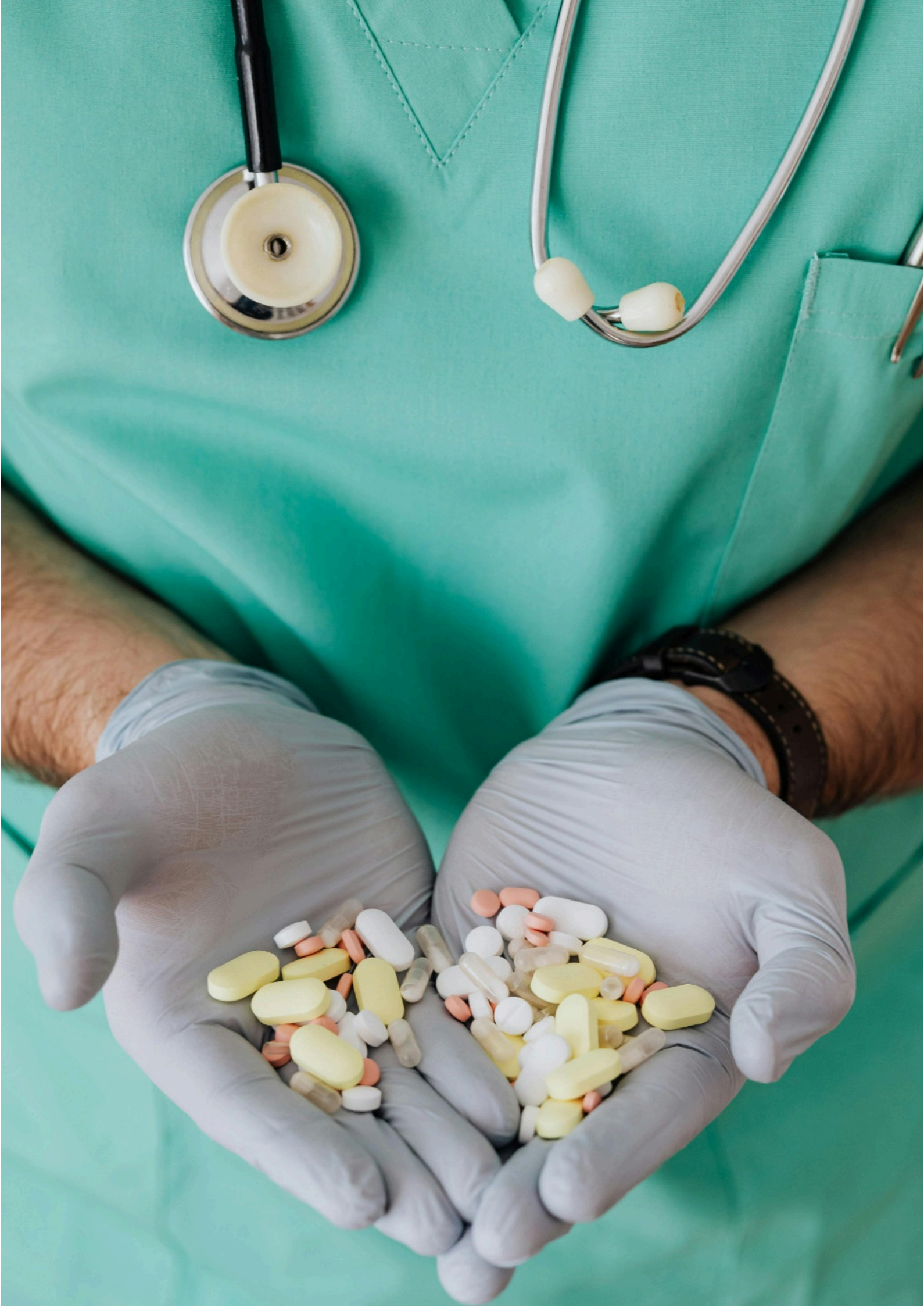




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Message

From Our Chairman

At MS Pharma, improving our communities' quality of life is not simply our mission; it is our reason for being. The Compass brings that purpose to life. As our navigational guide, it helps us stay true to our values, no matter how complex the journey. It defines the principles that shape every decision, ensuring our growth remains responsible, our impact enduring, and our legacy one of trust.

Our vision is to be united as an inspiring champion, transforming the biopharmaceutical market and expanding our footprint. Achieving this requires more than operational excellence; it requires a resilient culture. Our Triple-T Values make that culture real:

- **Take Charge, Drive Change:** Lead with courage, integrity, and accountability.
- **Together for Better:** Build trust through collaboration, transparency, and respect.
- **Thrive:** Create an environment where people and purpose grow side by side.



The Compass is our governance framework in action. It anchors MS Pharma's resilience: guiding how we anticipate risk, uphold patient confidence, and grow sustainably over the long term. It shows us how to model integrity in every market, reinforce confidence among regulators and partners, and strengthen the social contract that allows us to serve patients and communities responsibly. Speaking up, raising questions, and challenging what does not feel right are acts of leadership—protected, valued, and essential to who we are.

By living The Compass, we navigate challenges with courage and accountability, building an organization defined by trust and purpose. Each of us is responsible for understanding The Compass and adhering to its principles every day. That is how we will continue to earn the privilege of improving lives and shaping the future of healthcare—together.

Ghiath Munir Sukhtian



MS Pharma is an integrated pharmaceutical company focused on branded generics and biosimilars, with a strong presence in the Middle East and North Africa (MENA) Region.

- **Our Mission:** We are committed to improving our communities' quality of life.
- **Our Vision:** United as an inspiring champion, we transform the bi-pharmaceutical market and expand our footprint.



If In Doubt, Ask,

- Is my action legal and honest?
- Does it reflect our values?
- Could it hurt someone's trust in us?
- Would I feel okay if this became public?
- Have I asked for help if I'm not sure?

If your answer to any question is **NO**, or if you remain uncertain, seek guidance immediately from your **Line Manager, Department Head, or the Compliance Function**.

How to Use “The Compass”?

The Compass applies to everyone who represents MS Pharma employees, temporary staff, contractors, agents, distributors, and business partners across all markets where we operate. It complements, but does not replace, local laws, regulations, and company policies; where these are stricter, the stricter rule always applies. Use The Compass as a daily guide to drive decisions, actions, and relationships. Please use it as a daily guide to drive decisions, actions, and foster relationships.



THE COMPASS
CODE OF CONDUCT



Chapter 1: Take Charge, Drive Change

At MS Pharma, we lead from the front—with courage, accountability, and uncompromising Ethical Standards. Taking charge means acting entrepreneurial, mastering the rules, making the right call under pressure, and owning both decisions and outcomes. This chapter defines how we uphold integrity, make responsible choices, and leverage innovation safely.

✓ 1.1 Lead with Integrity and Compliance

Integrity for MS Pharma is not optional—it is our license to operate. Compliance protects patients, ensures supply continuity, and builds the trust of regulators, partners, and communities. Taking charge in this context means doing the right thing, even when it is difficult or inconvenient.

✓ 1.1.1 Legal & Regulatory Compliance

Why it Matters?

At MS Pharma, we are committed to operating in full compliance with local laws and international standards such as GMP, GDP, and GVP, as well as EMA, FDA, and SFDA requirements. Accurate and timely documentation ensures full traceability and safeguards patient safety. Compliance also extends to trade regulations: we must respect international trade sanctions and export controls when distributing to different countries.

Your Role

Follow all applicable laws, regulations, and company SOPs without exception. Keep records precise and escalate issues when in doubt. By doing so, you protect both our patients and MS Pharma's reputation.

Do:

- Stay up to date on regulations and SOPs relevant to your role.
- Document all manufacturing, testing, and distribution activities completely and accurately.
- Complete mandatory trainings and ask questions when unsure.
- Confirm that shipments comply with trade sanctions and export control laws.
- For more information, check with Legal / Compliance Departments.

Don't:

- Ignore regulatory or SOP updates.
- Cut corners in documentation or batch release.
- Overlook trade restrictions or attempt to bypass them.

Real-Life Example

While preparing a biosimilar batch record, you notice a missing entry in a test log. Instead of moving forward, you escalate the issue to QA—even if this delays release. Similarly, if you receive an order from a country under trade restrictions, you must halt the process and consult Management or Compliance Function before proceeding.

Key Takeaway

Disciplined compliance is non-negotiable. It protects patients, ensures market access, and safeguards MS Pharma's integrity worldwide.



✓ 1.1.2 Financial Integrity

Why it Matters?

Compliant and accurate financial records are critical for audits, tax compliance, anti-fraud measures, and maintaining the trust of regulators, partners, and the public. MS Pharma will not facilitate tax evasion or tolerate misrepresentation of financial data.

Your Role

Record every transaction truthfully and promptly. If you spot irregularities, whether in reporting, invoicing, or third-party requests, you must raise them immediately. Upholding financial integrity ensures MS Pharma's credibility and long-term success.

Do:

- Follow policies and procedures as well as rules and regulations
- Record all transactions (e.g., product samples, HCP payments, supplier invoices) completely and promptly.
- Investigate and report discrepancies, suspected fraud, or unusual requests.
- Ensure invoices and payments reflect true values and services.

Don't:

- Manipulate sales data or channel inventory to meet targets.
- Agree to under-invoice or misstate shipment values to reduce taxes or duties.
- Ignore irregularities in financial reports.

Real-Life Example

You notice duplicate entries in a sales report. Rather than ignoring them, you flag and correct the issue, even if it impacts financial results. In another case, a distributor asks you to issue an invoice for a lower amount than the actual shipment to reduce customs fees. The correct action is to refuse and escalate to Management or Compliance function.





✓ 1.1.3 Anti-Bribery, Corruption and Conflict Management

Why it Matters?

Our work often involves healthcare professionals and government officials, distributors, suppliers, regulators or other 3rd parties. These relationships can bear high risk. Bribery, kickbacks, facilitation payments, or money-laundering breaches threaten our integrity and our license to operate. Taking Charge means having the courage to say “no” to unethical requests and reporting them immediately.

Your Role

Stay alert to red flags in any interaction. If something feels suspicious, escalate it without delay. Always act with transparency and never compromise your integrity for short-term gain.

Do:

- Politely decline any gift or gesture that could be perceived as a bribe or kickback.
- Verify the identity of third parties and ensure appropriate background checks are completed.
- Report suspicious requests (e.g., “expedite approval for a fee”).
- Keep accurate records of all interactions.

Don't:

- Offer or agree to facilitation payments under any circumstance.
- Structure payments to hide sources of funds.
- Tie any gift, benefit, or payment to business outcomes.
- Ignore or downplay questionable behavior.

Real-Life Example

A distributor proposes paying a “special fee” to speed up regulatory paperwork. The right response is to decline, document the interaction, and report it to Compliance immediately.



✓ 1.1.4 Conflict of Interest



Why it Matters?

Business decisions must be based on fairness and objectivity. Personal, financial, or family relationships can influence—or appear to influence—our judgment. Taking Charge means being transparent about potential conflicts so they can be managed early.

Your Role

If you or a close relative has a connection that could affect your work, disclose it right away. Step aside from decision-making where your impartiality could be questioned.

Do:

- Disclose if a family member or close contact works for a supplier, CRO, distributor, or regulator.
- Remove yourself from decision making situations where you have a personal interest.
- Ask for guidance if you're unsure whether a situation is a conflict.

Don't:

- Hide personal or family relationships that could bias decisions.
- Influence outcomes when you have a financial or relational interest.

Real-Life Example

You're asked to evaluate a CRO where your cousin works in management. The right action is to disclose the relationship immediately and step back from the process to avoid bias.

Key Takeaway

Zero tolerance for bribery and full transparency on conflicts protect our people, our patients, and MS Pharma's reputation. Taking Charge in these moments means safeguarding integrity over convenience.

✓ 1.1.5 Political Neutrality

Why it Matters?

MS Pharma respects the personal rights of employees to engage in political activities. However, the company itself must remain neutral. Using corporate resources or identity for political purposes can create bias, reputational risk, and regulatory issues. Taking Charge means knowing where the line is—and keeping company and personal roles separate.

Your Role

You are free to participate in political life outside of work, but always in your personal capacity. MS Pharma's name, funds, and platforms may never be used to support a political agenda.

Do:

- Engage in political activities only as a private individual.
- Make clear that your views are your own and not linked to MS Pharma.

Don't:

- Use company funds, branding, logos, or email systems for political campaigns
- Represent your personal political beliefs as those of MS Pharma.

Real-Life Example

You are invited to speak at a political event. You may attend, but you must do so as a private individual—not as an MS Pharma representative—and without using company resources.

Key Takeaway

Take Charge by respecting the boundary between personal political participation and the company's neutrality.



✔ 1.2 Protect Patients and Build Trust

At MS Pharma, our main responsibility is to protect the people who rely on our medicines. Safeguarding their safety, health, and trust is both our ethical duty and our license to operate. Building trust means ensuring the quality, efficacy, and transparency of our medicines, and promoting them responsibly and in line with scientific and regulatory standards. We safeguard patient well-being through disciplined pharmacovigilance, ethical promotional practices, and a shared commitment to doing what's right for every patient, every time.

✔ 1.2.1 Medicine Safety and Pharmacovigilance

Why it Matters?

Patient safety is at the heart of everything we do. Ensuring the quality, efficacy, and safety of our medicines is not just a regulatory requirement — it's a moral and ethical obligation. Every employee at MS Pharma plays a role in monitoring and reporting any product-related safety concern to protect the well-being of patients, healthcare professionals, and our communities.

Your Role

- Report any adverse event, side effect, or product complaint immediately through the established pharmacovigilance (PV) channels: pharmacovigilance@mspharma.com
- Follow all quality, regulatory, and documentation procedures precisely.
- Never delay, ignore, or minimize potential safety information.
- Protect patient data confidentiality at all times.

Do:

- Record and report any information related to product safety or quality issues immediately.
- Cooperate fully with Medical Affairs, Quality, and PV teams during safety investigations.
- Stay informed about company policies and training related to PV compliance.

Don't:

- Attempt to handle or investigate adverse events on your own.
- Disregard reports because you believe they are incomplete or unlikely.
- Share safety data outside the approved reporting channels.

Real-Life Example

A pharmacist informs you that a patient experienced unexpected dizziness after taking one of our products. You collect the details respectfully and report them immediately through the Pharmacovigilance reporting system, ensuring proper follow-up and documentation.

Key Takeaway

Every employee has a duty to protect patients. Prompt and accurate reporting of safety information demonstrates the value of **Take Charge** — doing what's right, every time, to ensure trust in MS Pharma and the medicines we provide.

✓ 1.2.2 Promotional Practices and Ethical Interactions with Healthcare Professionals

Why it Matters?

Our relationships with healthcare professionals (HCPs) are built on trust, integrity, and respect for patient welfare. Every conversation, meeting, or promotional activity reflects MS Pharma's reputation and ethical standards. We are committed to ensuring that all information we share about our products is accurate, balanced, and supported by scientific evidence. Our promotional activities must always comply with applicable laws, regulations, and industry codes — including those governing interactions with HCPs, government officials, and institutions.

Your Role

- Ensure that all promotional materials and activities are approved through the proper internal review process before use.
- Provide accurate and balanced product information, never exaggerating benefits or minimizing risks.
- Maintain transparency and professionalism when interacting with HCPs and healthcare institutions.
- Understand and follow MS Pharma's policies on gifts, hospitality, sponsorships, and scientific events.
- Always separate commercial objectives from medical or scientific exchange — patient benefit comes first.

Do:

- Discuss products only within their approved indications and label claims.
- Disclose MS Pharma's sponsorships or support when organizing or participating in medical events.
- Report any suspected breaches of promotional compliance or unethical conduct.
- Keep records of interactions as required by law or internal policy.

Don't:

- Offer or promise money, gifts, or benefits to influence prescribing or purchasing decisions.
- Use unapproved or off-label information in promotional materials or discussions.
- Misrepresent clinical data or use misleading comparisons with competitors.
- Engage with HCPs on social media about products without following company policy.

Real-Life Example

During a medical conference, an HCP asks about an unapproved indication for one of our products. You explain that you can only discuss approved uses and refer the HCP to the Medical Affairs department for further information.

Key Takeaway

Our credibility with healthcare professionals is built on transparency and ethics. By ensuring responsible promotion and professional interactions, we uphold our commitment to patients and demonstrate what it means to Take Charge with integrity.

Ethical engagement builds trust.. Trust builds lasting partnerships.



✔ 1.3 Take Ownership of Ethical Business Decisions

Owning decisions means standing behind your choices—especially when the path isn't clear. At MS Pharma, we don't look the other way or leave tough calls to chance. Taking ownership requires slowing down when needed, documenting your reasoning, seeking expert input, and escalating early. Whether it's an off-label request, a compassionate use case, or a supply challenge, ethical ownership protects patients, builds trust, and ensures we make decisions we can defend with confidence.

✔ 1.3.1 Decision-Making in Ambiguous or High-Risk Contexts

Why it Matters?

Some situations are not black and white. When uncertainty exists, structured decision-making prevents errors and reduces risk. Taking Charge means knowing when to pause, ask for help, and escalate.

Your Role

Don't guess or make risky calls under pressure. Consult Management, document the options and risks, and ensure your reasoning is clear.

Do:

- Seek guidance whenever uncertainty exists.
- Document all options, risks, and rationale behind decisions.
- Escalate early rather than waiting for an issue to grow.

Don't:

- Make risky decisions alone.
- Allow external pressure to override proper process.

Real-Life Example

A physician requests information about an off-label use of one of our medicines. The right response is to route the request to Medical Affairs and document the interaction, rather than answering directly.

Key Takeaway

When in doubt, pause and seek guidance—never compromise patient safety or compliance.



Doing the right thing is a responsibility, not an option

✓ 1.3.2 Owing Our Impact and Commitments



Why it Matters?

Accountability builds trust with regulators, healthcare professionals, and patients. Mistakes can happen—but covering them up destroys credibility. Taking Charge means acting responsibly, admitting errors quickly, correcting course, and communicating openly.

Your Role

If something goes wrong, own it. Report issues immediately, take corrective action, and ensure all stakeholders are informed. Protecting patients and upholding MS Pharma's integrity depends on your transparency.

Do:

- Report and correct errors—including adverse events—promptly.
- Communicate delays, shortages, or supply issues openly and early.
- Accept responsibility and learn from mistakes.

Don't:

- Hide compliance failures.
- Shift blame to others.

Real-Life Example

You uncover an unreported adverse event. The right action is to notify Pharmacovigilance immediately so it can be investigated and addressed, even if reporting causes short-term challenges.

Key Takeaway

Take Charge by owning your actions—protect patients, protect colleagues, and protect MS Pharma.



✓ 1.4 Champion Innovation and Digital Responsibility

Innovation drives progress at MS Pharma, but it comes with responsibility. Digital tools, AI, and advanced technologies can improve quality, and speed—but they also carry risks related to data privacy, bias, and security. Taking Charge means using these tools responsibly, validating results, and ensuring that innovation always serves patient safety and societal trust.



✔ 1.4.1 Responsible Use of AI and Digital Tools

Why it Matters?

Digital platforms and AI are powerful, but if misused they can compromise data integrity, safety, and compliance. Responsible use ensures accuracy, protects privacy, and keeps people—not machines—accountable for critical decisions.

Your Role

Follow approved processes for system use and data handling. Always validate AI outputs before acting on them, especially when they impact quality, safety, or people.



Do:

- Follow SOPs for data entry, security, and privacy.
- Validate AI-generated outputs before making decisions.
- Report system issues or unusual outputs.

Don't:

- Use unapproved apps or platforms to process or store sensitive data.
- Rely on AI outputs without human review.

✔ 1.4.2 Ethical Innovation and Access-Oriented Thinking

Why it Matters?

Innovation must never come at the expense of safety or equity. Taking Charge means designing development programs that prioritize patient safety, regulatory comparability, and fair access to medicines. By embedding ethics into innovation, we ensure that progress builds trust with regulators and communities and strengthens MS Pharma's role as a responsible leader in advancing healthcare.

Your Role

Drive innovation with discipline. Follow regulations, avoid shortcuts, and design products and trials with patient access in mind.

Do:

- Ensure clinical trials and development programs prioritize safety and access.
- Consider affordability and equitable distribution

Don't:

- Prioritize speed over safety or compliance.
- Cut corners in R&D or regulatory submissions.





Chapter 2: Together For Better



We deliver sustainable impact through unity, trust, and collaboration. Together for Better means safeguarding assets, driving quality, and building trust with partners and across functions—inside and outside the company. Acting together ensures our work is stronger, safer, and more impactful. This chapter explains how collaboration guides us to protect what matters, uphold quality with responsibility, and foster trust through open communication.

✓ 2.1 Safeguard Assets and Communications

Our intellectual property, data, equipment, and communication systems are strategic assets. Protecting them protects patients, competitiveness, and trust. Working Together for Better means treating company property responsibly and ensuring sensitive information is secure.

✓ 2.1.1 Safeguarding Intellectual Property and Confidential Information

Why it Matters?

MS Pharma's intellectual property and confidential know-how are the foundation of our innovation pipeline and competitive strength. Careless handling risks not only our business edge, but also patient trust and the credibility of years of research. Acting Together for Better means each of us plays a role in protecting the knowledge we create, so our teams and patients can benefit from it.



Your Role

Always treat confidential information as company property. Use approved tools and safeguards when sharing or storing data and never disclose sensitive information without authorization.

Real-Life Example

At a conference, avoid sharing unpublished data or confidential program details—even in informal conversations.

Key Takeaway

Protecting IP protects our future, it secures our edge, our science, and the patients who rely on us.

Do:

- Use NDAs when sharing information externally.
- Store sensitive documents securely (encryption, access controls).

Don't:

- Discuss pipeline products in public or with unauthorized parties.



✔ 2.1.2 Safeguarding Company Assets

Why it Matters?

Company assets—such as samples, IT equipment, vehicles, and data—are shared resources that enable our daily work. Misuse or loss can create compliance risks, safety issues, and costs. Together for Better means treating these assets with respect, because they exist for the benefit of all.

Your Role

Use company property responsibly, safeguard it from loss or misuse, and report problems immediately.

Do:

- Track sample distribution and returns.
- Report lost or stolen assets immediately

Don't:

- Use company assets or samples for personal purposes.

Real-Life Example

You misplace a company phone containing sensitive emails—report it to IT and Compliance at once so protections can be activated.

Key Takeaway

Safeguarding company assets protects our resources, strengthens compliance, and ensures they serve the purpose they were meant for.



✔ 2.1.3 Governance on Communication Systems

Why it Matters?

Official communication systems—such as email and messaging—are discoverable business records. Using them correctly ensures compliance, transparency, and organizational trust. Together for Better means using these systems responsibly to safeguard MS Pharma's reputation and collective credibility.

Your Role

Use only company-approved channels for business communications. Keep records of important correspondence and ensure system access is secure.

Do:

- Use company email for business communications.
- Archive important correspondence (e.g., regulatory submissions).

Don't:

- Use personal email for work,
- Share passwords and access credentials

Real-Life Example

When you receive an external business query, reply via company email and save the correspondence for records.

Key Takeaway

Responsible communication is part of compliance and a safeguard for our credibility.

2.1.4 Data Privacy & Cybersecurity



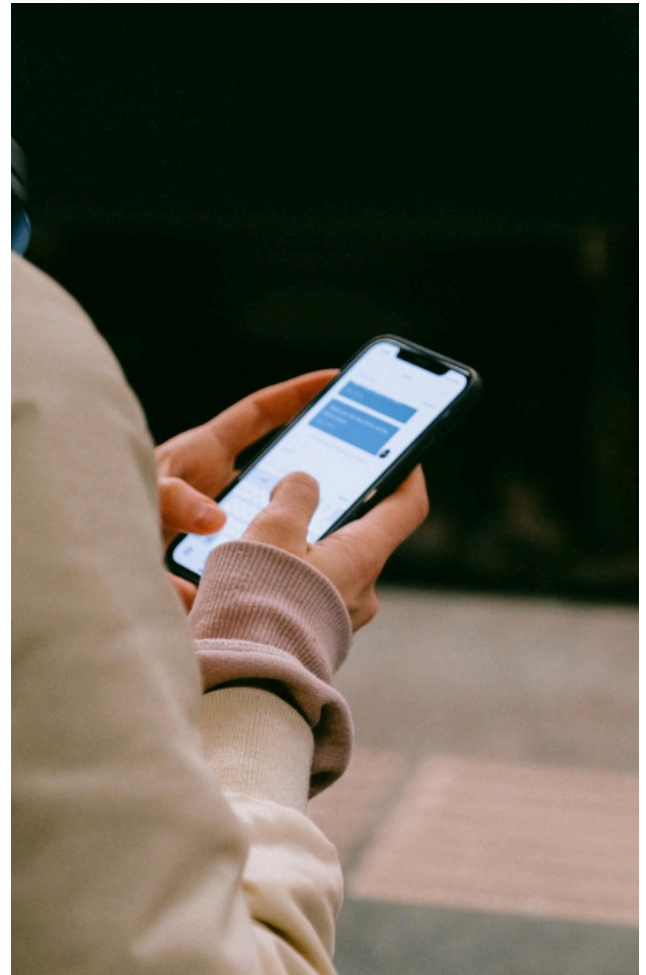
Why it Matters?

Patient, employee, and stakeholder trust depends on how we protect and manage personal data and company information. Mishandling data or ignoring cybersecurity safeguards can harm individuals, disrupt our operations, and expose MS Pharma to serious regulatory and reputational risks.

Protecting data is an ethical and legal obligation by acting responsibly and safeguarding the trust others place in us.

Your Role

- Handle all personal and confidential information in line with company policies and applicable data-protection laws.
- Access, use, and share data only for legitimate business purposes and with proper authorization.
- Use secure systems and approved platforms for storing, sending, or processing data.
- Stay alert to cybersecurity risks such as phishing, malware, and social-engineering attempts, and report anything suspicious immediately.



Do:

- Obtain consent or approvals before collecting or using personal data.
- Protect passwords and devices; lock your screen when away.
- Use strong, unique passwords and change them regularly.
- Report any data loss, suspected breach, or unauthorized access to the IT Security or Compliance team without delay.

Don't:

- Share personal or confidential data with unauthorized people, inside or outside the company.
- Transfer company files to personal drives, email accounts, or unapproved cloud storage.
- Discuss or display patient, customer, or employee information in public or online.
- Ignore suspicious emails, system alerts, or potential data breaches.

Real-Life Example

You receive an email from an unknown sender asking you to verify your login details to “update your MS Pharma account.” You suspect a phishing attempt, delete the message, and immediately report it to the IT Security team — preventing possible unauthorized access to company systems.

Key Takeaway

Every employee shares responsibility for protecting data and digital assets. By handling information carefully and remaining vigilant online, we protect patients, colleagues, and MS Pharma’s reputation.



✔ 2.2 Drive Excellence Through Quality and Responsibility

At MS Pharma, quality is a collective responsibility and a core part of who we are. From sourcing raw materials to delivering medicines to patients, every colleague has a role to play in ensuring our products are safe, effective, and reliable.

Together for Better means that R&D, manufacturing, supply chain, commercial, and support functions all contribute to the same standard of excellence, because every step matters. By embedding vigilance, precision, and accountability into our daily work, we protect patients, maintain supply continuity, secure regulatory trust, and strengthen MS Pharma's reputation as a partner of choice across our markets. Quality is how we differentiate ourselves, how we deliver on our promise of accessible medicines, and how we safeguard our future.

✔ 2.1.2 Reliability & Quality

Why it Matters?

MS Pharma's reputation depends on the safety, consistency, and quality of our products. Quality systems, validated processes, and precise records ensure we meet regulatory standards and keep patients safe. Working Together for Better means every team member takes personal responsibility for getting it right the first time.

Your Role

Follow established procedures, record activities accurately, and report problems early. Be vigilant and proactive; quality in everything we do is a shared responsibility.

Do:

- Follow MS Pharma's SOPs and practice standards.
- Report deviations and complaints immediately.

Don't:

- Circumvent practices and rules.

Real-Life Example

You spot a temperature excursion in a shipment. It is your responsibility to raise the issue to the responsible function at MS Pharma.

Key Takeaway

Quality is a discipline that protects patients, builds trust, and defines who we are at MS Pharma.

✓ 2.2.2 Minding Health, Safety, and The Environment



Why it Matters?

At MS Pharma, protecting the health and safety of our people and safeguarding the environment are integral to how we operate responsibly. We are committed to preventing harm, reducing risks, and promoting sustainability in everything we do.

Working **Together for Better** means looking out for one another and for the communities around us. Every decision —from wearing protective equipment to minimizing waste—contributes to a safe workplace and a healthier planet for future generations.

Your Role

- Always follow health, safety, and environmental (HSE) procedures and instructions.
- Take immediate action if you see unsafe conditions, hazards, or environmental risks.
- Encourage others to work safely and responsibly, report any incidents promptly.
- Conserve energy, water, and materials, and reduce waste wherever possible.

Real-Life Example

You notice a colleague using chemicals without proper protective gear. You remind them of the safety requirements, ensure they follow procedures, and report the near-miss so that preventive measures can be reinforced.



Do:

- Wear the required personal protective equipment (PPE) in laboratories, production, and warehouse areas.
- Participate actively in safety briefings, drills, and environmental awareness sessions.
- Handle and dispose of waste responsibly, following regulations and standard operating procedures (SOPs).

Don't:

- Bypass safety procedures, ignore spills, or fail to report hazards.
- Disregard environmental rules or take shortcuts that could endanger people or the planet.

Key Takeaway

Safety and sustainability are non-negotiable. Protecting people and the environment is everyone's duty — it's how we live our values and ensure we operate responsibly **Together for Better**.

✔ 2.2.3 Embedding ESG in Everyday Practices

Why it Matters?

Environmental, Social, and Governance (ESG) principles are woven into how we operate. They influence manufacturing, shape company culture, and strengthen our reputation. Together for Better means making sustainable, inclusive, and ethical choices that benefit patients, colleagues, and communities.

Your Role

Consider ESG impacts in your daily work. Whether managing suppliers, leading teams, or planning projects, factor in sustainability, fairness, and inclusion.

Do:

- Support recycling and energy-saving initiatives.
- Promote diversity and inclusion in teams.

Don't:

- Overlook ESG impacts when selecting suppliers or setting processes.



Real-Life Example

Propose switching to eco-friendly packaging for a new product launch—saving costs and supporting sustainability.

Key Takeaway

ESG is a daily commitment.

✔ 2.3 Build Trust Through Collaboration and Communication

At MS Pharma, trust is built through how we collaborate and communicate — within our teams, with our partners, and with the world around us. Together for Better means partnering ethically, sharing responsibility across functions, and ensuring that every interaction and message reflects transparency, respect, and integrity. We work with third parties, collaborate across teams, manage gifts and hospitality with professionalism, and communicate responsibly through media and social channels to protect MS Pharma's reputation and uphold the confidence of regulators, healthcare professionals, and the communities we serve.

*When teams
communicate openly and
collaborate effectively,
ideas flow freely, problems
are solved faster, and
everyone contributes to
shared success*



✓ 2.3.1 Ethical Collaboration with Third Parties (Healthcare Professionals, Vendors, Suppliers, Business Partners)

Why it Matters?

Every third party we work with—whether a healthcare professional, supplier, vendor, distributor, or any other—can impact MS Pharma’s quality, compliance, and reputation. If they cut corners or act unethically, the consequences fall on us. Together for Better means choosing partners who share our values, conducting proper due diligence, and holding them accountable to our standards.

Your Role

Always assess risks before onboarding, ensure contracts embed compliance obligations, and monitor performance regularly. If red flags arise, raise them immediately, don’t assume someone else will.

Real-Life Example

A manufacturing partner fails a compliance audit—pause collaboration until corrective actions are verified.

Do:

- Conduct risk-based due diligence before onboarding.
- Embed compliance obligations in contracts and monitor performance.

Don’t:

- Ignore red flags or audit findings.

Key Takeaway

Work only with partners who share our standards.

✓ 2.3.2 Cross-Functional Ethical Collaboration

Why it Matters?

High-impact decisions in the Pharmaceutical Industry—from clinical programs to product launches—require multiple perspectives. Acting in silos risks compliance failures, missed insights, and weaker outcomes. Together for Better means bringing the right people to the table, sharing responsibility, and documenting decisions clearly.

Your Role

Engage colleagues cross functionally in planning and decision-making of complex topics. Ensure meetings are structured and outcomes are recorded for accountability and alignment.

Real-Life Example

Discuss complex projects such as a product launch cross functionally before making decisions. Document the agreed actions.

Key Takeaway

Collaboration improves outcomes and compliance readiness.

Do:

- Involve relevant functions in planning and decisions.
- Document cross-functional meetings and outcomes.

Don’t:

- Make unilateral decisions on high-impact programs.

✔ 2.3.3 Corporate Gifts and Hospitality

Why it Matters?

At MS Pharma, we do not offer, give, request, or accept gifts, entertainment, or hospitality that could compromise our integrity or appear to improperly influence business decisions. Where permitted by law and policy, any gift or hospitality must be modest, infrequent, transparently recorded, and never cash or cash equivalents (e.g., gift cards). It must never be conditioned upon—or be a reward for—prescribing, purchasing, or favoring MS Pharma products.

Your Role

Follow MS Pharma policy thresholds and approval routes. Ensure any gift/hospitality has a genuine business purpose, complies with applicable laws and industry codes, is properly documented, and is never tied—directly or indirectly—to prescribing or purchasing our products, regulatory outcomes, or favorable treatment.

Do:

- Provide appropriate, business-related hospitality (e.g., modest working meals at approved venues).
- Disclose and document gifts/hospitality as required.

Real-Life Example

Instead of a high-end dinner for HCPs, provide a modest working lunch during a compliant, agenda-driven meeting, recorded per policy and local law. Do not offer hospitality during a formulary decision or tender.

Don't:

- Provide or accept lavish or frequent hospitality.
- Offer gifts/hospitality during tenders, price negotiations, inspections, or regulatory processes.
- Link any gift/hospitality to prescribing, purchasing, or placement of MS Pharma products.

Do:

- Direct media inquiries to the Communication Department.
- Stick to approved messaging and disclosures.

Don't:

- Make public statements about products or pipeline without prior approval.

Real-Life Example

When asked about a product recall, please refer to the official spokesperson.

Key Takeaway

Only authorized spokespersons speak for MS Pharma.

✔ 2.3.4 Engage the Media Responsibly

Why it Matters?

Public statements carry weight—they influence how regulators, partners, patients, and competitors see us. A careless comment can create reputational or legal risks. Only trained, authorized spokespeople speak for MS Pharma, so our message is consistent, accurate, and aligned with company strategy.

Your Role

If approached by the media, do not respond directly. Redirect inquiries to the Communication Department and always use approved messaging.



✓ 2.3.5 Responsible Social Media and External Communications

Why it Matters?

What we share online and how we communicate externally reflect directly on MS Pharma’s integrity and credibility. A single careless post, message, or comment can harm patients, reveal confidential information, or damage our reputation. Being responsible digital citizens means thinking before posting, protecting company and patient information, and ensuring that anything shared about MS Pharma or its products is accurate, respectful, and pre-approved.

Your Role

- Keep personal and professional content clearly separate.
- Follow company policies and approval processes for any posts or external communications related to MS Pharma, its products, or its business.
- Protect confidential information, intellectual property, and patient data at all times.
- Be respectful in all online interactions — avoid statements that could be interpreted as offensive, discriminatory, or misleading.

Do:

- Think carefully before you post — if in doubt, don’t post.
- Clearly state when views expressed are your own.
- Direct any media or influencer inquiries to the Communications Department.
- Seek prior approval for posts mentioning MS Pharma products, activities, or events.

Don’t:

- Share internal, confidential, or promotional information without authorization.
- Comment on regulatory, R&D, or product matters on social media or public forums.
- Engage in arguments or use language that could reflect negatively on MS Pharma or its stakeholders.

Real-Life Example

Before sharing photos from a company event on LinkedIn, you verify that the images don’t include confidential materials or unapproved product references, and you obtain Communication approval before posting.

Key Takeaway

Use social media responsibly and professionally. Protect our patients, colleagues, intellectual property, and company reputation by communicating thoughtfully and in line with MS Pharma’s values.





Chapter 3: Thrive

At MS Pharma, we believe that when our people thrive, the company thrives. Thrive is about creating a culture where colleagues feel respected, supported, and empowered to grow. It is about fairness, dignity, well-being, and finding purpose beyond the workplace. This commitment is not just good for our teams, it strengthens our ability to deliver high-quality, accessible medicines to patients across our markets.

A motivated, healthy, and inclusive workforce is the foundation of innovation, compliance, and long-term success. This chapter explains how fostering fairness, respecting personal well-being, and embracing purpose beyond the workplace builds a culture of trust, belonging, and shared ambition—where every colleague has the chance to thrive and contribute to MS Pharma’s greater mission.

3.1 Build a Culture of Fairness and Inclusion

Fairness and inclusion are central to MS Pharma’s growth. We operate across diverse geographies and cultures, and our strength comes from bringing those perspectives together. Inclusive teams make better decisions, drive innovation, and reflect the patients we serve. Thrive means every colleague has equal opportunities to contribute, develop, and be recognized, no matter their background.

***Fairness is not an attitude.
It is a professional
discipline that must be
practiced every day.”***

— Simon Sinek



✓ 3.1.1 Equal Employment Opportunity



Why it Matters?

At MS Pharma, we believe diversity of people, perspectives, and experiences strengthens who we are. Equal employment opportunity is not just a policy—it is a core expression of our value Together for Better. When hiring, developing, or promoting people based on merit, competence, and potential, we create a workplace where everyone can contribute and thrive. Discrimination in any form—based on gender, age, race, nationality, religion, disability, marital status, or any other personal characteristics inconsistent with our values.

Your Role

- Treat everyone with dignity and fairness in all employment decisions.
- Base hiring, promotion, and development on merit and performance only.
- Speak up if you see or experience bias, harassment, or unfair treatment.
- Support inclusive behaviors and help others feel valued and respected.

Do:

- Use objective, competency-based tools for interviews, reviews, and promotions.
- Ensure equal access to learning, mentorship, and advancement opportunities.
- Encourage diverse shortlists and balanced representation in hiring.

Don't:

- Allow personal preferences, stereotypes, or bias to influence decisions.
- Dismiss concerns about discrimination or unequal treatment.
- Engage in or tolerate jokes, comments, or behavior that demean others.

Real-Life Example

During an interview panel, you notice a colleague making personal comments unrelated to the candidate's skills or experience. You respectfully redirect the discussion back to job-related criteria and later remind the panel to focus on structured, competency-based questions that ensure fairness and consistency for all candidates.

Key Takeaway

Equal opportunity is everyone's responsibility. Fair, inclusive, and merit-based decisions strengthen collaboration, build mutual respect, and create a workplace where we achieve more Together for Better.



✔ 3.1.2 Culture of Recognition and Appreciation

Why it Matters?

Recognition motivates people, strengthens engagement, and fosters loyalty. Thrive means celebrating contributions big and small, building a culture where everyone feels valued. At MS Pharma, we actively encourage and celebrate this approach—because recognizing effort and achievement inspires excellence and strengthens our shared success.

🎯 Your Role

Give recognition authentically and in a timely manner. Celebrate team and individual wins and provide constructive feedback regularly.

Do:

- Celebrate approvals, launches, audits milestones and other achievements
- Give frequent, constructive feedback.

Don't:

- Ignore contributions or take credit for others' work.

Real-Life Example

After a successful audit, thank the team involved publicly and highlight the specifics of what went well.

Key Takeaway

Appreciation is daily leadership.

✔ 3.2 Respect Personal Rights and Well-being

We handle sensitive data and work in environments that demand professionalism, fitness for duty, and respect for boundaries. Thrive means protecting privacy, health, and well-being so our teams stay safe, trusted, and effective.



✓ 3.2.1 A Workplace Free from Harassment and Side Talks



Why it Matters?

At MS Pharma, we are committed to maintaining a workplace built on respect, dignity, and professionalism. Everyone has the right to work in an environment that is safe, inclusive, and free from any form of harassment, bullying, intimidation, or gossip. Such behaviors undermine teamwork and damage trust. We take a zero-tolerance approach to harassment or disrespectful conduct in any form — whether verbal, physical, visual, or online.

Your Role

- Treat all colleagues, contractors, and business partners with respect and courtesy.
- Foster open, constructive dialogue, even when opinions differ.
- Speak up or seek help if you experience or witness harassment, bullying, or inappropriate behavior.
- Avoid any conversations or “side talks” that spread gossip, rumors, or harm others’ reputations.

Do:

- Intervene or report if you see someone being treated unfairly or disrespectfully.
- Use professional language and tone in all interactions, including online communications.
- Support colleagues who raise concerns — listen and encourage them to use the reporting channels.
- Give frequent, constructive feedback.

Don't:

- Engage in or tolerate harassment, bullying, or exclusionary behavior.
- Make jokes, gestures, or comments that could be considered offensive.
- Participate in gossip or side discussions that create division or harm trust.

Real-Life Example

During a team meeting, a colleague repeatedly interrupts and mocks another team member’s ideas. You calmly step in to redirect the conversation, ensuring respectful dialogue, and later report the behavior to HR or your line manager so it can be addressed.

Key Takeaway

A respectful workplace is everyone’s shared responsibility. When we act with integrity, listen with empathy, and treat others with dignity, we build a culture where we Thrive.

Respect in the workplace means speaking with integrity, treating others fairly, and leaving gossip and harassment behind.



✔ 3.2.2 No Tolerance for the Use of Illegal Substances

Why it Matters?

Impairment puts colleagues, processes, and patients at risk. A safe workplace requires everyone to be alert and fit for duty. At MS Pharma, there is zero tolerance for the use of illegal substances. Such behavior compromises safety, violates the law, and undermines the trust placed in us by patients, regulators, and one another. Every employee has a responsibility to maintain a substance-free environment to protect both people and the integrity of our work.

Your Role

Stay substance-free at work. If you suspect misuse, report it promptly and confidentially.

Do:

- Report suspected substance misuse promptly.

Don't:

- Work under the influence of drugs or alcohol.

Real-Life Example

You suspect a colleague is impaired—report it to the Human resources Department per policy.

Key Takeaway

Safety comes first.

✔ 3.3 Commit to Purpose Beyond the Workplace

Our purpose goes beyond manufacturing medicines. Thrive means serving communities, elevating patient dignity, and living our values in ways that inspire trust—especially when no one is watching.





✓ 3.3.1 Rooted Commitment to Community

Why it Matters?

When MS Pharma supports communities, we strengthen health systems and demonstrate our role as a partner for progress.

Your Role

Stay substance-free at work. If you suspect misuse, report it promptly and confidentially.

Do:

- Volunteer for health campaigns and support advocacy efforts where permitted.
- Align external activities with company values.

Don't:

- Allow external commitments to conflict with job responsibilities.

Real-Life Example

Join a local vaccination drive in coordination with approved partners and policies.

Key Takeaway

We serve our communities.



✓ 3.3.2 Putting Patients First in Everything We Do

Why it Matters?

Patients are at the heart of MS Pharma. Every decision we make—whether in research, manufacturing, or commercialization—must prioritize their safety, dignity, and access. Putting patients first means going beyond compliance to act with compassion, responsibility, and integrity. It requires us to measure success not only by business outcomes, but by the real impact our medicines have on people's lives and communities.

Your Role

Always escalate risks that could affect patients. Factor access and affordability into planning and decision-making.

Don't:

- Compromise patient interests for convenience or profit.

Do:

- Escalate and mitigate patient risks immediately.
- Champion access and affordability considerations.

Real-Life Example

You identify an adverse event —raise it immediately in line with policies and procedures.

Key Takeaway

Every action or decision we take should benefit patients.

✔ 3.3.3 Living the Values Day-to-Day

Why it Matters?

Culture is not what we say—it's what we do. Small daily actions, positive or negative, shape the reality of our workplace. Thrive means living by MS Pharma's values consistently, even in the small moments.

Your Role

Model integrity, fairness, and respect. Support colleagues and address behavior that contradicts our values.

Do:

- Model integrity, fairness, and respect daily.

Don't:

- Ignore behaviors that contradict our values.

Real-Life Example

A teammate is struggling—offer support and encourage them to seek help.

Key Takeaway

We are all ambassadors of our culture.

Chapter 4: Speak Up

At MS Pharma, our strength comes from integrity, transparency, and accountability. Speaking up is not only a right, but also a responsibility. When something doesn't look or feel right, raising your voice allows us to correct course, protect patients, and uphold the trust of regulators, partners, and communities.

We provide multiple safe and confidential reporting channels and guarantee that employees who raise concerns in good faith will be protected from retaliation. By speaking up, we learn, improve, and safeguard our reputation as a company patients and partners can rely on.





Why it Matters?

No Code of Conduct works if people are afraid to raise concerns. At MS Pharma, we are committed to creating a culture where every colleague feels empowered to speak up. Retaliation against anyone who reports a concern in good faith will not be tolerated. Speaking up helps us identify risks early, correct mistakes, and protect our people and patients.

Your Role

If you see, hear, or suspect misconduct—whether it relates to safety, quality, harassment, compliance, or any other matter—raise it promptly. Use the reporting channel you trust most and know that MS Pharma will investigate fairly and protect you from retaliation.

Don't:

- Retaliate against someone who raised a concern.
- Ignore or discourage reporting.

Do:

- Use any reporting channel you trust: your manager, Company Management, or Compliance Function.
- Report promptly if you see, hear, or suspect misconduct.
- Encourage colleagues to speak up if they raise concerns with you.

Real-Life Example

You notice irregularities in supplier invoices – raise the concern with your line manager or the compliance function.

Need Guidance Or Want To Raise A Concern?

We all share responsibility for protecting MS Pharma's integrity and reputation. If you have a question, need advice, or wish to raise a concern, use the channel you trust most:

- Your **Line Manager**
- Your **Department Head**
- A Member of the **Management Team**
- The **Compliance Function**



Report

You can also report directly and confidentially via email at: voicemyconcerns@mspharma.com

All reports made in good faith are treated seriously, investigated promptly, and handled with strict confidentiality. Retaliation against anyone who raises a concern or participates in an investigation will not be tolerated.

Speaking up protects our people, our patients, and our company. When in doubt — reach out.



THE COMPASS

CODE OF CONDUCT

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