

Promedon

— People + Innovation



Ethical commitment

Ethical commitment



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**MARCELO
OLMEDO**
PROMEDON'S PRESIDENT

Letter

from our President



Every day, hundreds of people around the world receive a medical treatment that includes a product supplied by Promedon. The successful outcome of this treatment will allow these people to recover their health, and, consequently, enjoy life to the fullest with their loved ones.

This reality, which fills us with pride, entails a huge responsibility for all of us who work at Promedon: we must complete our daily tasks with strict professionalism and a strong sense of ethics and integrity. Our Mission cannot be properly achieved without sound ethical guidelines to guide us in our actions.

This is precisely what Our Code of Ethics, our "**Ethical Commitment**," is about. It is the guide that clearly defines how we do business at Promedon, it sets the standard

we must adhere to for every action we take, and it serves as the basis for all of our company's Policies & Procedures.

I invite you to read this document, to apply its principles in your daily work, and to consult the appropriate people when you have questions. I hope it is useful for you so we can move forward everyday as we build a company that stands out not only for the quality of the products we sell, but for the high ethical standards upon which we base our business.

Sincerely,

Marcelo Olmedo
President



Chapter

The importance of
our Ethical
Commitment.

**To whom does
it apply?**





Promedon's *Ethical Commitment* ("Ethical Commitment") reflects and is based on our Mission, Vision, and Values. It serves as the cornerstone for our company's Policies & Procedures, and it outlines behavior expected from all of us.

This document helps us to build and sustain a culture based on ethics and integrity, which is necessary in order to fulfill our Mission since our Mission requires us to conduct ourselves in an ethical manner that goes beyond mere compliance with Laws & Regulations.

That is why the expectations regarding our daily commitments at Promedon are outlined in this document. This *Ethical Commitment* is our guide so that each and every

one of us can truly live by the Mission. It is only through this shared commitment that we will be able to ensure the long-term sustainability of Promedon.

Each of us, regardless of our role, represents Promedon. As a result, we must act and conduct ourselves according to the provisions herein. For this reason, this *Ethical Commitment* applies directly to all Promedon Group companies, and to its Colleagues, including Directors & Leaders.

Promedon expects that its vendors, sales agents, and other Third Parties, when operating on our behalf or to our benefit, follow and comply with the provisions of this *Ethical Commitment*.

A GUIDE TO LIVE BY THE MISSION



The benefits of a Culture based on *ETHICS AND INTEGRITY.*

Working together to build and maintain a Culture based on ethics and integrity creates many benefits:

- We get the **personal satisfaction** of doing the right thing.
- We **protect our clients** (especially the Patients who use our products).
- We increase our **competitive advantage**, as it helps us to differentiate our Products & Services from our competitors.
- We **build trust** with those with whom we interact, both internally and externally, by adhering to the highest ethical standards.
- We ensure that the Company's **good reputation**, which has been earned and maintained by our work and that of our predecessors, is maintained and continues in the future.
- We reduce the possibility of noncompliance with Laws, Regulations, and other rules, as well as any consequences that may result.

In short, it reaffirms the sense of pride we feel when working at Promedon.



It is very important that you read, understand, and comply with this *Ethical Commitment.*

If you have any concerns, please contact the Corporate Legal & Compliance Department, or the Local Human Resources Department.

For any issues related to interactions with Health Professionals, the prevailing document is the *Promedon Code of Ethics for Interacting with Health Professionals.*



Chapter

Our purpose:
Mission, Vision,
and Values.

At Promedon, we believe that our main responsibility is to contribute to helping Patients reestablish their quality of life by providing our Products & Services to Health Professionals in an appropriate manner. As a result, will we only be able to fulfill our Mission by comprehensively and transparently providing innovative high quality products and services.

Each and every one of us, regardless of the role or function that we perform, are necessary in order to fulfill this purpose. Every day is an opportunity to show that our passion for what we do is unique and that we are part of a very big project.

Success cannot be achieved without our commitment: Let's make it happen together!



EVERY DAY IS AN OPPORTUNITY



Our **MISSION**

Our Mission at Promedon is to **"Contribute to reestablishing people's quality of life by developing and providing healthcare professionals with safe and effective medical technology."** This is the reason why we work every day, and the reason for our existence.

Our **VISION**

Our Vision is to **"Be a global company, successful in every market where it operates,"** and it guides us to where we want to go as organization. It is the challenge we set for ourselves when we think about the future.

Our VALUES

Our values are the foundation for our beliefs, and they play a pivotal role by guiding our actions. They are clear and simple:



Mission, Vision, and Values: A Framework for Decision Making.

Mission, Vision, and Values are very important for any company. They help us to determine our direction when it is time to make decisions.

We must keep them in mind because, together with the *Ethical Commitment*, they help us to understand if an action will be ethically acceptable.

Our People.

Our world at Promedon is built daily with the support of all our Colleagues. The individual as a complete being is the central axis of Promedon's culture. We believe that our people are the protagonists of our story. That is why we are committed to fostering strong bonds and long-term relationships.

Passion for what we do.

We are energetic professionals, committed and focused on our work. We aim to appreciate and enjoy what we do, striving day after day to improve our work and reach challenging goals.

Quality in our Products & Services.

An important purpose brings us together, and we are aware of the strict quality standards required in our industry. That is why we work closely together – so that those who benefit from our work around the world can receive safe and effective Products & Services.

Innovative Spirit.

We believe innovation is fundamental to our company's development. That is why we are taking on new challenges. We are encouraging the participation of all our Colleagues to create, to implement new ideas, and to impart change and continuous improvement.

Ethical Commitment.

At Promedon, we are all responsible for conducting ourselves in accordance with the highest ethical standards. Ethical conduct fills us with pride, and it gives purpose to our work. We understand that this is an unwavering and fundamental value.

Chapter



Individual
responsibility.



We strongly believe that we are all the main characters in our story. We work in teams and know that we are each responsible for conducting ourselves ethically. Together, our group and individual commitments will help us to create and maintain a culture of integrity.

Leaders:
Additional Responsibility.

Leaders have an additional responsibility with regard to providing guidance and support to their teams when it comes to fulfilling our *Ethical Commitment*.



ACTING WITH INTEGRITY

Complying with this **Ethical Commitment**, Local Codes of Conduct, Laws, and Regulations.

This *Ethical Commitment* helps us to understand what it means to act with integrity, and it defines the minimum expectations regarding ethical conduct at Promedon. Consequently, our duty is to follow both the spirit and the letter of this *Ethical Commitment*.

This means that we must understand and adjust our actions and behavior so that they are in accordance with the provisions of this *Ethical Commitment*, as well as Local

Codes of Conduct, the Company's Policies & Procedures, and Laws & Regulations applicable to our work.

However, we are also aware that this *Ethical Commitment* cannot cover every situation that we may encounter on a daily basis. As a result, it is expected that we will act using our best judgment, and, if we have any concerns, we will contact our Leaders, the Corporate Legal & Compliance Department, or the Local Human Resources Department.



How to make the right *DECISION?*

If we are faced with a difficult situation in which we have to make a decision, we must first ask ourselves the following:

Is this behavior contrary to this *Ethical Commitment* or the *Promedon Code of Ethics for Interacting with Health Professionals?*

Is this behavior contrary to the *Local Code of Ethics* or the *Company's Policies & Procedures?*

Is this behavior contrary to applicable *Laws & Regulations?*

If any of the answers was "Yes" or "I Don't Know," we should ask for help.



We believe that acting with integrity means being honest, being responsible, and doing the right thing. Although this sounds relatively simple, in practice, it may sometimes be challenging.

Whenever we have concerns regarding decisions to be made or conduct to follow, we must ask questions. Depending on the situation, we can contact different people:

Your **Leader** is always available to answer general questions regarding the appropriate performance of your role and any questions related to Policies & Procedures applicable to your work area.

The **Corporate Legal & Compliance Department** will be able to answer any question and receive any concerns regarding the interpretation and application of this *Ethical Commitment*, Local Codes of Conduct, the Company's Policies & Procedures, and applicable Laws & Regulations.

The **Local Human Resources Department** will be able to help you with questions regarding Local Codes of Conduct, the Company's Policies & Procedures, and everything related to employment at the Company, including benefits and other topics related to your day-to-day experiences.

The **Auditing and Finance & Management Departments** will be able to help you resolve concerns regarding Policies & Procedures related to financial and accounting issues.

For issues related to the quality of our products and services, you can always contact the **Quality Department**. Likewise, you can contact the **Regulatory Department** if you have concerns regarding Regulations that are applicable to us.

With regard to the appropriate use of our computer assets, you can contact the **Information Systems (IT) Department**.

The importance
of asking questions.
Points of contact
TO FIND HELP.





Non-Retaliation Policy.

Our Company does not and will not tolerate retaliation against anyone that has a concern, doubt, question, or contribution, or who files a claim regarding noncompliance or contributes to an investigation related to expected conduct under this *Ethical Commitment*, Local Codes of Conduct, the Company's Policies & Procedures, and applicable Laws & Regulations.

Regardless of their position or role at Promedon, anyone who engages in retaliation will be subject to the Consequences for Conduct Contrary to Our *Ethical Commitment*.

Consequences for Conduct Contrary to this **Ethical Commitment** and other rules.

At Promedon, we take noncompliance with this *Ethical Commitment*, Local Codes of Conduct, the Company's Policies & Procedures, and applicable Laws & Regulations very seriously.

When appropriate, disciplinary measures will be taken, which may include termination of the work relationship. These measures will be applied based solely on the nature, severity, and frequency of the inappropriate conduct, regardless of the position and role at Promedon of the person who has committed the infraction.



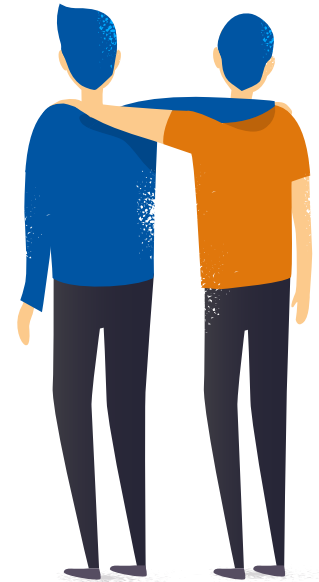
Chapter

The commitment
between Us.



At Promedon, we are united by a common purpose. In order to achieve it, we rely on a team of people who work hard for one another. We are aware of our relationships, and we are responsible for the bonds we create daily.

Our interactions are based on considering the person as a whole. As a result, we must always be respectful, friendly, and tolerant, but, at the same time, we must be guided by effort, a call to service, commitment, and passion.



RESPECTFUL, FRIENDLY, AND TOLERANT



Fair and respectful treatment.

At all times, we must create a fair and respectful environment. It is everyone's responsibility, but especially that of our Leaders, to create relationships based on trust and the free exchange of ideas and perspectives that allows us to develop our potential and to be recognized for our efforts.

Healthy and safe environment.

The health and safety of everyone who works at Promedon is one of the top priorities at each of our offices. Each of us is responsible for the health and safety of those around us, and so:

- We must always do the right thing to avoid the possibility of injuries, diseases, or damage to the environment.

Seeing the individual as a complete being.

We believe in every person, and this belief is part of our essence. We work with an atmosphere of respect and friendliness towards others, and seek to strengthen our long-term relationships. We value our people by respecting their ideas and opinions.

We have a comprehensive perception of people. As a result, we encourage actions that foster a balance between professional and personal life. We support our Colleagues through the different stages of their lives.

At Promedon, we have a zero tolerance policy for any type of discrimination or harassment. Anyone who behaves in such a way, regardless of their position and role at Promedon, will be subject to disciplinary action, as established in the section related to Consequences for Conduct Contrary to Our *Ethical Commitment*.

- We must follow applicable environmental, health, and safety Regulations, as well as all related Promedon Policies & Procedures.
- We must report unsafe or hazardous conduct or situations to our Leaders

We are united by a common purpose, and so we are also committed to our community. In order to achieve our Mission and Vision, we rely on a team of people who work hard for one another. We are passionate and committed to our work.

Chapter



The commitment
to the Company.



We live in a complex, dynamic, and challenging world, where rapid changes can easily create uncertainty regarding how to make the right decision in a difficult situation. As a result, we must always take into account that the long-term sustainability of the Company is directly linked to our daily conduct and actions, and that complying with our Mission is intrinsically related to our reputation and integrity.



OUR DAILY CONDUCT AND ACTIONS

Decision making and Conflicts of Interest.

A Conflict of Interest occurs when a relationship or a personal interest influences our ability to make decisions or to perform our work in an objective manner. Even the appearance or perception of a Conflict of Interest can put our Company at risk. As a result, our personal interests must not be factors that influence any action or put the Company's best interests at risk.

In this regard, we must not forget that our ultimate responsibility is to our Shareholders. Managing Company resources and Assets, as well as decision making, must always take place within an ethical framework, and must be based on Promedon's best interests.

Whenever we face a Conflict of Interest, we are responsible for disclosing it to our Leader or to the Human Resources and/or Legal & Compliance Departments.

Proper Book and Record-Keeping.

Proper Book and Record-Keeping is very important, not only because it is the right thing to do and Laws and Regulations require it, but also because our Books and Records are a key source of information for decision making. At all times, we must keep the Company's Books and Records properly, which includes all aspects regarding how we operate, report, document, and comply with our record-keeping obligations.

All transactions conducted by the Company must be recorded properly, in the appropriate fiscal period, and must be supported by corresponding documents.

Improperly kept Books and Records may disrupt the confidence placed in us by everyone who interacts with Promedon, may affect our reputation and that of our Shareholders, and may expose the Company to penalties and sanctions.

Steps to manage Conflicts of Interest. The "3 Steps"

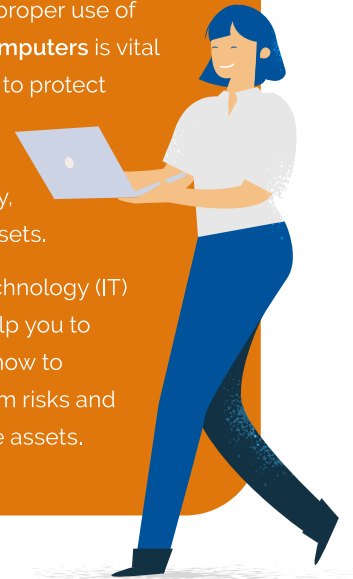
Managing Conflicts of Interest involves three big steps:

- **Speak/Communicate:** This is the most important step.
- **Debate:** This entails evaluating the situation.
- **Decide:** Make a decision about how to proceed.

You can find more information regarding how to manage these steps in the Corporate Conflicts of Interest Policy.

The importance of proper use of **cell phones** and **computers** is vital to our commitment to protect Confidential Information, Intellectual Property, and Promedon's Assets.

Our Information Technology (IT) Department can help you to better understand how to protect yourself from risks and to appropriately use assets.



Protecting Confidential Information.

Promedon's Confidential Information is valuable and must be protected by avoiding its disclosure to third parties. Similarly, we must respect and protect Confidential Information entrusted to us by third parties.

We are responsible for maintaining the confidentiality of such information, and if there is even merely the perception of its unauthorized disclosure, we should report it immediately to our Leaders and to the Corporate Legal & Compliance Department.

Intellectual Property.

Promedon has its own Intellectual Property, and it is authorized to use the Intellectual Property of Third Parties. The ownership and use of Intellectual Property can be crucial for our long-term success and sustainability.

Consequently, as part of our role, we may come into contact with Patents, Trademarks, and Copyrights, as well as other types of Intellectual Property. We must be very careful when handling them, especially in those cases in which we may possibly infringe on the Intellectual Property of Third Parties.

When in doubt, we should always check with our Leader and/or the Legal & Compliance Department.

Use of Promedon's Assets.

Promedon's Assets include all real estate, property, facilities, equipment, tools, vehicles, and other goods or items that provide us with support and allow us to perform our work on a daily basis. Reimbursed expenses, paid and/or authorized in relation to our role at Promedon, are also included under this category.

We must value and preserve Promedon's Assets, since a great deal of our project as a Company depends on our ability to use them effectively in our work.

Under no circumstances should we use them for personal purposes, non-business-related purposes, or purposes contrary to those stated herein. Leaders are responsible for all expenses incurred or authorized by their respective departments or teams.

Confidential Information in the workplace.

We handle a large amount of Confidential Information on a daily basis. As a result, we must be very careful with it. Some examples of Confidential Information include:

- Sales details.
- Business goals.
- Marketing and product development strategies.
- Information about new products or projects.
- Product production, research, and design processes.

It is impossible to list every type of Confidential Information. If you have a concern about the confidential nature of a piece of information, you should always consult with the Legal & Compliance Department and/or your Leader.

Corporate credit cards and computer equipment: Are they Promedon's Assets?

Yes, they are. They are tools that Promedon entrusts to Colleagues who perform certain roles so that they can complete their work. Corporate credit cards should not be used for personal expenses.



Chapter

Commitment
to our
Environment.

We endeavor to be market Leaders in innovative technology. We do so proactively as a team. We encourage ourselves to take on new challenges by constantly building an engaging culture.

We know that our Products & Services have a great impact on the people who need them. As a result, our main goal is to continually seek to add value to what we do while providing quality Products & Services in an ethical and transparent manner.



ADDING VALUE TO WHAT WE DO



Interacting properly *WITH THIRD PARTIES.*

In order to fulfill our Mission and Vision, we must interact with Third Parties. These relationships must always be set within a legal, ethical, and transparent framework. This practice is the basis for generating healthy long-term relationships. We are all responsible for maintaining the trust placed in us by our peers, by Promedon, and by the environment.

a. Patient Interactions.

We strongly believe that all Patients have the right to be treated with courtesy, honesty, respect, and empathy. They are the reason for our Mission, and our work should be focused on their benefit.

We also understand that Patients have a right to privacy. As a result, it is part of our commitment to protect all Confidential Information related to them.

b. Interactions with Private Sector Third Parties, Business Gifts and Hospitality.

At Promedon, we respect the local culture, but we also know that we should not request, accept, offer, or give gifts or entertainment that may influence the ability to make objective business decisions. These situations may not only cause Conflicts of Interest, but they may also be contrary to the commitments assumed by Promedon, as well as applicable Laws & Regulations.

If you have any concerns, you should consult with the Legal & Compliance Department before giving or receiving gifts or entertainment to Private Sector Third Parties.

c. Interactions with the State and the Government. Anti-Corruption.

In many countries, interactions with the Government are strictly regulated, so we must be very careful and always conduct ourselves with the highest degree of integrity possible. In this regard, we should not engage in any action that could be, or could be understood to be, an attempt to influence a decision by a Government and/or a Public Official.

It is our commitment not to offer or pay bribes or make illegal payments of any type, including those described as Facilitation Payments. In this same regard, we should not request, accept, offer, or give gifts or entertainment to or from Public Officials.

What is a Third Party?

A Third Party is a person or an entity (business, association, foundation, etc.) that does not have a working relationship with Promedon, but one we might interact with due to our work or the Company's business efforts.

Public Sector Third Parties

(also called "Public Officials") are officials, agents, employees, or any other person acting for or on behalf of: (1) a Government; (2) any ministry, department, agency, or instrument of a State, including companies owned or controlled by it; (3) any international public organization; (4) a political party; or (5) any candidate for a political position. Those designated as such by local Laws are also included in this definition.

Private Sector Third Parties

are defined as people or entities who are not Public Sector Third Parties.

Ensuring Quality and *REGULATORY COMPLIANCE.*

We work every day to ensure that our Products & Services are of the highest quality, safety, and reliability. It is possible to achieve this goal only by complying with all applicable Laws & Regulations, as well as with Promedon's related Policies & Procedures.

In addition to our responsibility, we hold our suppliers, vendors, and other Third Parties involved in the value chain accountable for complying with these rules in order to ensure the quality of their services and of our Products & Services.

We should always remember that in order to ensure that Patients can benefit from our Products & Services, we must follow the rules established by local Regulatory Agencies. This includes obtaining regulatory approvals and the appropriate records in order to sell our Products & Services; ensuring that packages and labels are correct and comply with the applicable Regulations for each territory; and complying with all regulatory requirements related to our Products & Services.

Commitment to Quality is a Call to Action!
Our commitment to Quality requires that:

- We report any quality risks related to our Products or Services, or to their production processes.
- We report any safety risks for our co-workers.
- We immediately report any complaints related to our Products & Services.
- We ask questions whenever we have concerns.





Driving *INNOVATION.*

Our Vision calls us to be a successful company in every market where we operate. In order to achieve this goal, we recognize that it is vital for us to continually innovate and to foster an environment filled with creativity, participation, respect, and freedom in order to transform new ideas into Products & Services that create value.

We aim to keep our Products & Services performing at a high level for a long time. As a result, we listen to and strive to understand the information that Patients, Health Professionals, the Government, and its Regulatory Agencies provide to us in order to create innovative solutions.

When we innovate, we aim to understand and address both the legal and ethical considerations that may arise, including those related to new Products & Services. That is why we understand that the innovative process must be respectful of not only all Laws & Regulations, Promedon's Policies & Procedures, and Third Party Intellectual Property, but, above all, of the dignity of all the people involved, especially Patients.

Innovators from day one!

Our company's origins are linked to a specific innovative and entrepreneurial event. It was 1985, and Raúl Olmedo, a curious, determined, and prestigious urologist focused on innovation, was designing and developing some handcrafted implants for his field of specialization. He had identified that his profession needed implants that were not available at that time. From his conscientious and team-oriented work focused on Patients, the first revolutionary "Dr. Olmedo Male Impotence Prosthesis" and the first testicular prostheses were created by what would then become Promedon.

It is our duty to continually innovate so as to be market Leaders and be able to meet tomorrow's challenges.

COMMUNITY.

At Promedon, we are aware of our capacity to create an impact in the communities where we work and live. That is why we must be socially responsible and work with the highest ethical standards.

In this regard, we are committed to supporting the development of different organizations that contact us due to their socially-relevant causes.

We also support the members of our team who chose to volunteer their time and abilities in order to make a difference in society by donating their time to actions for the public good.

ACTIONS FOR THE PUBLIC GOOD





DEFINITIONS



- **Books and Records:** All of Promedon's books and commercial and corporate records. This definition includes, for example, accounting books, Board and assembly minutes, financial balances, audit results, contracts, and business plans.
- **Colleagues and Leaders:** Promedon's Colleagues are all the people who work for and hold a position at Promedon. Colleagues who coordinate activities, projects, and tasks for other Colleagues, and who are responsible for the final outcome of their work teams, are called "Leaders." Promedon's Directors that are not part of the Company's Board are included here as Leaders.
- **Confidential Information:** All of Promedon's technical or business information, regardless of how it exists or has been transferred. Promedon's Confidential Information includes, for example, data bases, formulas, prototypes, designs, models, drawings, technical specifications, purchase requirements, samples, informative programs, forecasts, client or project details, techniques, inventions, discoveries, "know-how," and trade secrets.
- **Conflict of Interest:** A situation that arises when a relationship or personal interest influences our ability to make decisions or to perform our work impartially.
- **Copyrights:** All moral and proprietary rights granted by law to authors due to the mere fact of creating a literary, artistic, musical, scientific, or didactic work, whether it is published or unpublished.
- **Directors:** The top Leaders of the company, who are part of the Board, and who have a strategic role in directing the organization and setting goals.
- **Government:** Authorities that direct, control, and manage the bodies and institutions of the State. All members of the Government are Public Sector Third Parties, but not all Public

Sector Third Parties are part of the Government; for more information, see the definition of Public Sector Third Parties.

- **Health Professionals:** Individuals or entities involved in the provision of healthcare services or product supply for Patients.
- **Intellectual Property:** Type of intangible asset consisting of human creations protected by law. There are various types of Intellectual Property (Patents, Trademarks, Copyrights, etc.), and all of them can be the property of Promedon or of a Third Party.
- **Laws & Regulations:** Laws and Regulations are compulsory rules created by national or foreign State bodies. Laws are general rules issued by the legislative body, while Regulations are standards, guidelines, and rules issued by State agencies that regulate Laws in greater detail. For example, Regulatory Agencies issue Regulations, while a congress, parliament, or legislature passes Laws.
- **Local Codes of Conduct:** Supplemental documents to this *Ethical Commitment* that contain a conduct agreement and commitment to comply with each subsidiary's rules.
- **Patent:** Right granted under certain conditions and for a certain time by a State by which its holder has the right to exclude Third Parties from manufacturing, using, and selling an invention.
- **Patient:** Individual who is under medical treatment or care.
- **Policies & Procedures:** Promedon's internal documents that, in accordance with their scope, regulate the activities of Directors, Leaders, and Colleagues. Policies have principles, rules, and guidelines established and adopted by Promedon in order to achieve their

long-term goals. Procedures, on the other hand, are documents that are based directly or indirectly on a Policy and which describe the steps that must be followed in order to properly perform a particular task for various activities or courses of action.

- **Private Sector Third Parties:** Defined as Third Parties who are not Public Sector Third Parties.
- **Products & Services:** Products are tangible goods, along with accessories and complements that Promedon sells. Services, however, are intangible goods, which may or may not be related to a Product, that are sold by the Company. Together, both concepts encompass the entire value proposal offered by Promedon to its clients.
- **Promedon Group:** All legal entities that make up Promedon; together with other entities, the various subsidiaries from each country form the Promedon Group.
- **Promedon's Assets:** All the tangible and intangible goods owned by Promedon that are available to Directors, Leaders, and Colleagues so that they may fulfill their roles.
- **Public Sector Third Parties ("Public Officials"):** Any official, agent, employee, or any person acting for or on behalf of: (1) a Government; (2) any ministry, department, agency, or instrument of a State, including companies owned or controlled by it; (3) any international public organization; (4) a political party; or (5) any candidate for a political position. Those designated as such by local Laws are also included in this definition.
- **Regulatory Agency:** State agency that sets the standards, guidelines, and rules under which certain activities shall be performed.

- **Shareholders:** Individuals or legal entities that own part of the Company's share capital.
- **State:** Form of social organization made up by a set of bodies and institutions. The bodies and institutions of the State include, for example, ministries, departments, Regulatory Agencies, State-run businesses, and private companies controlled by the State.
- **Third Party:** Individual or entity with no working relationship with Promedon, but with which Promedon, its Directors, Leaders, and Colleagues might interact while performing their tasks. They could be Public Sector Third Parties ("Public Officials") or Private Sector Third Parties.
- **Trademark:** Any symbol, figure, word, or other distinctive sign used to exclusively identify a company, its products, or services.



I hereby certify that I have received a copy of Promedon's *Ethical Commitment* and have read and understood and shall comply with the provisions herein.

I will consult with my Department Leader or the Human Resources and/or Legal & Compliance Departments whenever I have a concern, question, or suggestion.

I understand that all of Promedon's Colleagues, Leaders, and Directors are individually responsible for knowing and complying with the principles, standards, and obligations as Stated in Promedon's *Ethical Commitment*.

I also understand that failure to comply with Promedon's *Ethical Commitment*, Local Codes of Ethics, the Company's Policies & Procedures, and applicable Laws & Regulations could lead to disciplinary sanctions according to the corresponding section herein.

First and Last Name: _____

Date: _____ Place: _____



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