

CODE OF CONDUCT (4)

1 May2023

Content Ed Net Group of Companies (CEN) List of Companies & Affiliates covered by the code:

Argentina

Content Ed Net S.A.

Australia

Content Ed Net Pty. Ltd.

Brasil

Content Ed Net Editora Ltda.

China

Content Ed Net LLC

Colombia

Content Ed Net SAS

Czech Republic (& Slovakia)

Content Ed Net s.r.o.

France

Content Ed Net PSI S.A.S.

Germany

Content Ed Net GmbH

Hungary

Content Ed Net Kommunikációs KFT

India

Content Ed Net Pvt. Ltd

Italy

Content Ed Net S.r.l.

Japan

Content Ed Net YG (Inc.)

Kazakhstan

LLC Reprints Unlimited

Korea (Republic of)

Content Ed Net Quest Pvt. Ltd.

México

Content Ed Net, S.A. de C.V.
Reprints Unlimited S.A. de C.V.

The Netherlands

Content Ed Net Medicom BV

New Zealand

Reprints Unlimited Asia Pacific Ltd.

Poland

Content Ed Net Sp. z o.o.

Portugal

Content Ed Net Lda.

Romania

Content Ed Net SRL

Russia

OOO Content Ed Net
ООО КОНТЕНТ ЭД НЭТ
Reprints Unlimited LLC

Singapore

Content Ed Net Pte. Ltd

South Africa

Content Ed Net (Pty) Ltd

Spain

Content Ed Net Communications, S.L.

Reprints Unlimited SL

Switzerland

Content Ed Net GmbH

Taiwan

Content Taiwan Limited

Turkey

Content Ed Net Yayıncılık ve Tic.San.Ltd.Şti

United Kingdom

Content Ed Net (London) Limited
Content Ed Net Advertising and Media Limited

USA

Content Ed Net LLC

Venezuela

Representaciones Content Ednet CA

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A. GENERAL TERMS

The Code set out general principles to guide employees in making ethical decisions, and they cannot and are not intended to address every specific situation. As such, nothing in the Code prohibits or restricts the Companies from taking any disciplinary action, whether or not they are expressly discussed in this document.

All employees have to comply with the applicable local laws. In case of conflict between this Code of conduct and the local company laws, the local company laws prevail. In case of differences between this Code and other internal regulations, the most restrictive prevails.

This Code was approved by the companies' management on 1 July 2020 and supersedes any previous Code of Conduct.

B. APPLICABILITY

The Code applies to all employees, officers and directors of the Companies.

By signing the Code (whether on paper or via email agreement) the employee adheres to the Code.

A violation of the Code may result in appropriate disciplinary action including the possible termination from employment with the Companies.

C. INTRODUCTION

Since its founding, the Companies' business practices have been governed by integrity, honesty, fair dealing and full compliance with all applicable laws. Our employees worldwide have upheld and lived this commitment in their everyday responsibilities ever since and CEN's reputation remains one of the its most important assets today.

The Companies' business principles prescribe certain values which CEN has committed to worldwide. This Code of Conduct specifies and assists the continued implementation of those business principles by establishing certain non-negotiable minimum standards of behaviour in key areas.

The nature of this Code is not meant to cover all possible situations that may occur. It is designed to provide a frame of reference against which to measure any activities. Employees should seek guidance whenever they are in doubt about the proper course of action in a given situation, as it is the ultimate responsibility of the employee to "do the right thing", a responsibility that cannot be delegated. Employees should always be guided by the following basic principles:

- Avoid any conduct that could damage or risk CEN or its reputation
- Act legally and honestly, comply with the laws and regulations of every country in which we do business.
- Put CEN's interests ahead of personal or other interests.

D. OUR MISSION AND VALUES

At our Companies we have a clear mission which informs everything we do; to create and deliver world class resources to the pharmaceutical industry for the reproduction and translation of medical journals and articles and to make them available across the world.

- We believe that our professional services will materially assist medical education and research to change lives for the better and so we create high quality resources to further that vision.
- We believe that trust underpins all of our work, from building strong relationships with publishers, suppliers, customers and colleagues to ensure that everything we do is honest and appropriate.
- CEN has established an excellent reputation and a strong global brand and we believe that our actions must support those important assets.
- We believe that we must continue in order to maximise the value we bring to the dissemination of pharmaceutical resources.

E. POLICIES AND PRACTICES

A conflict of interest may arise in any situation in which an employee engages in any activity that detracts from or interferes with his or her full, loyal and timely performance of services to the Companies, or has a financial interest that might influence the employee's judgement on behalf of the Companies.

All such conflicts should be avoided and employees must report any actual, potential or apparent conflicts to their manager or the CEO.

The following set of principles guides all of our work around the world.

1 ACCEPTING OR OFFERING OF GIFTS, HOSPITALITY AND ENTERTAINMENT

We compete and do business based only on competence and quality

In accordance with CEN practice and Bribery Act legislation, it is unacceptable to give or receive bribes - or gifts to gain influence – no matter what the local business practice may be. This applies to current or prospective suppliers, partners, customers, agents or affiliates.

We are happy to provide hospitality and entertainment to those with whom we work but adhere to the principle that such hospitality should not exceed what pharmaceutical professional recipients would normally be prepared to pay for themselves.

Payments in cash or cash equivalents will not be offered to those with whom we work.

Employees shall not be influenced by receiving favours and shall not accept gifts, meals or entertainment if such behaviour could create the impression of influencing the respective business relationship.

2 OUTSIDE ACTIVITIES

It is unacceptable to engage in anti-competitive practices, such as price fixing or collusion with any competitors of CEN.

We do not make personal investments which might affect our business judgement.

Outside of CEN, no activities will be pursued if such activities will interfere with the employee's responsibilities to CEN, or if they create risks for CEN's reputation or if they in any other way conflict with the interests of CEN

3 SUPPLIERS/PRINCIPALS

We value the confidence and trust of our customers and will always communicate honestly, openly and reliably with them.

We undertake to respond to suppliers/principals within contractual timescales in a professional manner.

We seek to ensure in all cases that our product information, advertising and other forms of communication are clear, accurate and honest.

4 OUR RECORDS AND DATA

We maintain records and data that fairly and accurately reflect our business transactions as they occur.

We adopt strict control and financial policies, which are adhered to at all times.

We are responsible for protecting information when handling other people's personal data, whether it relates to an employee or a customer.

We comply with local data protection laws.

5 CONFIDENTIALITY

We value and respect our confidential information and we respect the confidential information of others. Confidential information consists of any information that is not or is not yet public information. It includes trade secrets, business marketing and service plans, consumer insights, product information, databases and any non-published financial or other data.

CEN's continued success depends on the use of its confidential information and its non-disclosure to third parties. Unless required by law or authorised by senior management, employees shall not disclose confidential information or allow such disclosure. This obligation continues beyond the termination of employment.

All employees of the Companies are expressly aware of their duty to keep confidential all documentation provided by publishers and suppliers, as well as all documentation provided by the Companies to their customers. The Companies and their employees acknowledge the duty not to disclose the content of any such documentation to any third party, unless previously authorised to do so by the supplier, customer or publisher.

The employees of the Companies are expressly aware of their duty to CEN in keeping confidential all documentation in which CEN has a legal interest.

6 INTELLECTUAL PROPERTY

We respect and protect our suppliers' intellectual property (trademarks, design rights, copyrights, proprietary information and trade secrets) at all times.

7 THE USE OF COPYRIGHT

It is the policy of the company to adhere to all contracts with suppliers in all respects. In the event that we wish to use copyright material falling outside the scope of the agreement with the supplier, then written permission of the supplier will be sought.

We respect the trust placed in us by suppliers and take all reasonable steps to ensure that the integrity of the supplier's documents is guaranteed in both reproduction and translation.

In seeking to ensure the preservation of the supplier's copyright, we actively police the relevant markets to attempt to detect any infringement of copyright by competitors of our company.

All employees of this company have been made specifically aware of the company policy and also of the company's zero tolerance policy towards any incident of corruption.

8 RELATIONS WITH THE MEDIA

No employee of the Companies shall engage in dialogue of any description with accredited members of the Press, or any other form of Media, in relation to any matter howsoever concerning the Company. Should any employee of the Company be contacted by the Press or media, he/she should refer the matter to the CEO or the Companies' duly appointed spokesperson without further comment.

No employee of the Companies will engage in any form of defamatory statement regarding affiliated companies, in public, which includes for the avoidance of doubt all social media and networking sites, as well as the accredited press.

9 EQUAL OPPORTUNITIES

We embrace diversity and respect the personal dignity of our fellow employees

We confirm our commitment to equality of opportunity in all areas of our work. All individuals will be treated in a fair and equal manner and in accordance with the law regardless of gender, marital status, race, religion, colour, age, disability or sexual orientation. We respect the personal dignity, privacy and personal rights of every employee and we are committed to maintaining a workplace free from discrimination and harassment. Employees will not engage in any form of verbal or physical harassment based on any of the above or for any other reason.

We will not discriminate in any area of employment, or in the provision of our services to the public and we accept our responsibilities to comply with all relevant legislation.

It is the responsibility of all officers of the company to act in a fair and proper manner and in accordance with the company's policy. The responsibility for central co-ordination, advice and the review of the policy lies with the chief executive.

Anyone who feels that he or she has been subjected to unfair discrimination should take the matter up with the CEO or their line manager.

10 EMPLOYEE WORKING ENVIRONMENT

A safe working environment for all employees is of paramount importance to us

The Company operates in accordance with Health and Safety requirements laid down by the relevant legislation. The Company adheres strictly to a policy of a safe working environment for the benefit of its employees. All employees of the Company are required to follow the health and safety policies laid down by the Company.

Regarding employment, the Company warrants that:

- it does not employ engage or otherwise use any child labour in circumstances such that the tasks performed by any such child labour could reasonably be foreseen to cause either physical or emotional impairment to the development of such child;
- it does not use forced labour in any form (prison, indentured, bonded or otherwise) and its employees are not required to lodge papers or deposits on starting work;
- it provides a safe and healthy workplace, presenting no hazards to its employees;
- it does not discriminate against any employees on any ground (including race, sexual orientation, religion, disability or gender);
- it does not engage in or support the use of corporal punishment, mental, physical, sexual or verbal abuse and does not use cruel or abusive disciplinary practices in the workplace;

- it pays each employee at least the minimum wage, or a fair representation of the prevailing industry wage, (whichever is the higher) and provides each employee with all legally mandated benefits;
- it complies with the laws on working hours and employment rights in the countries in which it operates;
- it is respectful of its employees right to join and form independent trade unions and freedom of association.

11 TRAINING

The Company is committed to the ongoing development and education of all its employees. The Company will therefore ensure that all employees receive ongoing training appropriate to their role within the company.

12 PROTECTION OF CEN ASSETS

We insist upon honesty and we respect all CEN assets and property.

Employees must never engage in fraudulent or other dishonest conduct involving the property or assets or financial reporting and accounting of CEN or any third party.

We treat the Companies' property with respect and ensure that it is not used for personal purposes unless the company authorises.

13 THE ENVIRONMENT

CEN conducts its business in an environmentally conscious manner and insofar as is feasible from renewable resources. We understand that we have an impact on the environment, primarily through the use of energy, paper, the use of print and production technologies and the recycling of waste.

We are committed to reducing this impact where we can. We aim to:

- minimises the resources used and waste generated
- use sustainable and recyclable resources and materials with a minimum of associated waste
- use technologies, materials and processes that have a minimal impact on the environment, where possible

14 MAKING SURE OUR CODE IS WIDELY UNDERSTOOD

Everyone working for Content Ed Net will receive a copy, either electronically or on paper. This will be part of a New Employee's Information Pack and will be available on our corporate web site.

All senior managers are responsible for discussing the Code with their teams and reporting back on how they have done it, and what the response has been.

If there is anything in the Code of Conduct that you do not understand, or if you want some guidance you can ask for help from your manager.

If you think that someone is acting in a way that is inconsistent with our Code of Conduct, then it is important that you can take action by reporting it to your manager.

All employees will receive an annual reminder about our Code of Conduct, whether or not there are any changes to the content of the document. It is assumed that every individual will read the document on receipt or at their earliest convenience and that they will retain easily accessible copies for reference on a day to day basis.

A company email is provided for whistle blowers as follows: confidential@contentednet.com