



**BIOMAPAS**

Clinical Trials & Regulatory Solutions

# **CODE OF ETHICS**

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Dear Colleagues,

Over the years, Biomapas has developed into a successfully working company driven by both integrity and innovation. We are proud of this earned reputation and understand the responsibilities that lie on us.

Our Code of Ethics ("Code") is a guide to help us always work with the highest ethical and legal standards. All of us are personally responsible for this. We encourage to speak up without fear of retaliation if anyone suspects that someone in Biomapas has broken the Code or other policies and laws.

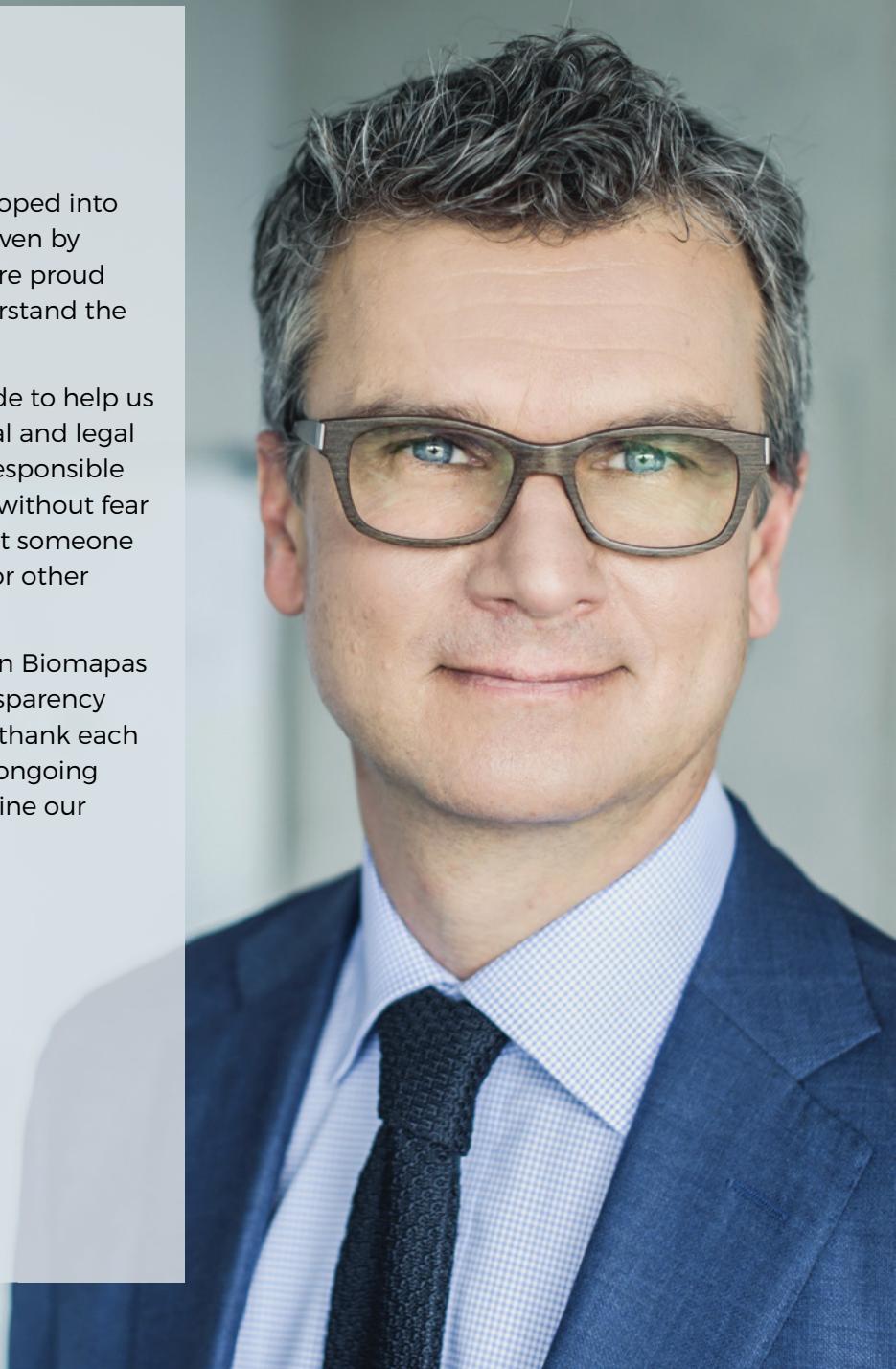
What binds all of us together here in Biomapas is our values – teamwork, trust, transparency and integrity in everything we do. I thank each of you for your hard work and your ongoing commitment to the values that define our success here at Biomapas.

We keep promises. Always.

Best regards,



Audrius Sveikata  
CEO  
Biomapas



# INTRODUCTION

## INTRODUCTION AND PURPOSE

Biomapas is a privately-owned contract research organization, established in 2001. The company started its activities by conducting Bioequivalence studies. One year later, Biomapas launched phase I-IV clinical research services and medical writing services. In year 2005 Pharmacovigilance services were launched. In 2009, due to the growing workload and number of projects, the Regulatory Affairs Department was established. Biomapas Quality Management System was certified to the ISO:9001 standard in 2012.

Successfully working over 15 years, Biomapas provides a proven track record in Phase I-IV clinical trials, regulatory affairs, pharmacovigilance services and quality assurance.

The Code of Ethics is Biomapas guide to appropriate conduct. Most of the Policies in this Code are based on laws, regulations and business, ethical and basic work rules and principles. We require all staff to comply with high standards of honesty and integrity and always act with accountability.

The purpose of the Code is to set common ethical and lawful standards which must be adhered by the Company. We should refer to it as we work and seek guidance if we are unsure of the proper course of action.

## SCOPE

The Code applies to all service areas of Biomapas and must be followed by all staff, which include but are not limited to members of board, employees, vendors and contractors.

## COMPLIANCE WITH THE CODE

We should ensure that we have read and understood the content of the Code and act accordingly. The Code is a set of ethical principles and cannot cover all situations that may occur. We seek guidance when in doubt about the proper and correct behavior in certain situations. If unsure, we should rely on basic principles:

- Avoid any illegal or dishonest behavior;
- Avoid any behavior, which does not comply with the Code and other Biomapas procedures and policies;
- Avoid any behavior, which could damage or risk Biomapas reputation and have negative consequences.

# PRINCIPLES

## VIOLATION OF THE CODE

We do not tolerate violations of the Code. Any violation or suspected violations of the Code must be reported as soon as possible to Quality Assurance Department using general e-mail [quality@biomapas.eu](mailto:quality@biomapas.eu). Known or suspected violations of this Code will be investigated and may result in appropriate actions. These actions include but are not limited to re-training, discipline or termination of employment.

Anyone who violates the law within the scope of his or her employment, or who commits a serious violation of this Code, is not entitled to incentive compensation, including annual or long-term bonuses, annual salary increases or other awards, unless prohibited by local law.

We are expected to speak up when encounter violations of the Code. All reports of suspected violations are confidential and taken seriously.

## FAILURE TO REPORT A VIOLATION

Failure to report a violation of the law or this Code is itself a violation of this Code and may result in disciplinary action, including possible termination of employment.



# PRINCIPLES

## SAFE AND HEALTHY WORKPLACE

The safety and security of our workplace is one of the main concerns of Biomapas. We should comply with requirements in appropriate Biomapas procedures related to physical security of workplace and other applicable local policies, laws, regulations, permits and licenses. We must ensure that Biomapas properties and resources are protected and kept secure from damage. We are expected to involve safety, health and environmental considerations in our daily working practice.

We promptly report hazardous situations or other risks to the department manager. We also know the emergency and evacuation actions and telephone numbers for our work location.

### WORKPLACE SECURITY

All of us working in the office must comply with the requirements of the *Physical Security of the Office* procedure.

### IT SECURITY. CLEAR SCREEN POLICY

Information and information systems of Biomapas must be protected and kept secure from disclosure of information. We are responsible for protecting the confidentiality of Company's information: information should be secured using passwords and other security systems; paper files should be secured in locked cabinets and essential original documents in fire-proof cabinets; business information, related to Biomapas, should not be discussed in public.

The clear screen policy refers to practices related to ensuring that sensitive information, both in digital and physical format, are not left unprotected at personal and public workspaces when they are not in use, or when we leave workplace, either for a short time or at the end of the day.

### DRUG- AND ALCOHOL- FREE WORKPLACE

The use of alcohol and drugs or being under the influence of controlled substances while on Biomapas property or performing work related duties is not tolerated.

### ENVIRONMENTAL PROTECTION

We are responsible to keep with environmental laws and regulations and minimize our actions and services which may have impact on the environment.

# PRINCIPLES

## STAFF RELATIONS AND EQUALITY

### EQUALITY AND EQUAL OPPORTUNITIES

A Company of Biomapas maintains a culture of respect and equality. We provide equal employment opportunities to all applicants and decision about hiring is made only relying on applicant's qualification, experience, abilities, potential and skills needed for applicable position. Discrimination of race, religion, age, gender, gender identity, skin color, sexual orientation, disability, marital status, family status and other characteristics protected by law is prohibited. The same principles of equality are applicable for recruitment, hiring and promotion.

We will provide reasonable accommodation for employees who have disabilities.

### DISCRIMINATION, HARASSMENT AND BULLYING

We do not tolerate any unwelcome conduct, whether it is verbal, non-verbal, racial, physical, sexual or any other form. We expect professional behavior by all staff members.

### RETALIATION

Retaliation against anyone who seeks an advice in good faith , raises a concern, reports misconduct or provides information in an investigation is strictly prohibited. Any act or threat of retaliation will in itself be considered a serious violation of this Code.



# PRINCIPLES

## BUSINESS ETHICS

### CONFLICT OF INTEREST

A conflict of interest is a situation where our personal interests conflict, or appear to conflict, with the interests of the Company. Conflicts of interest can arise in every area of Company operations. We expect our staff to distinguish between their professional and personal lives.

Having a second job is not necessarily prohibited, but it must not interfere or conflict with employee's regular duties, or undermine working effectiveness. This has to be reported to Human Resources for further approval. Having outside interests or employment which may interfere with employee's ability to perform his / her responsibilities are considered to be conflict of interest.

Members of Biomapas Board of Directors are subject to different restrictions on outside employment or activities as outlined in their governing documents.

Hiring relatives of current staff members is not prohibited, although there should be no direct or indirect reporting relationship between the employee and his or her relative or partner. However, all candidates, despite family relations, are treated equally (see Equality and equal opportunities).

A conflict of interest could arise if an employee, a spouse, a relative, or a close personal friend is a Biomapas customer or potential customer, employee in other CRO or otherwise involved in business relationship with Biomapas. Such conflicts of interest should be reported to Human Resources for approval.

We do not make procurement decisions that could benefit a friend, relative, or ourselves.

### ANTI-BRIBERY AND ANTI-CORRUPTION

We do not tolerate any form of corruption. Anti-corruption principles are described in detail in *Anticorruption Policy* which is compliant with relevant U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. It is unlawful to make a payment to a government official for the purpose of obtaining or retaining business, or for a competitive business advantage. Corruption carries consequences both for the Company and for individual employees. We follow anti-corruption legislation in the countries where we conduct business.

If you suspect an employee, contractor or third party is paying bribes or makes other corruptive actions or intermediates in it, you must immediately contact the Biomapas Management and Quality Assurance Department.

# PRINCIPLES

## FAIR DEALING

We conduct business in line with antitrust and competition laws. We deal fairly with our customers, vendors, competitors and employees. We do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair dealing practice.

We never agree with a competitor on limiting our competition. We do not communicate with competitors on sensitive topics such as pricing policies, marketing strategies and expansion plans.

Information about competitors is a valuable business tool, but it must be obtained from public sources. These sources include websites, public presentations, journal articles or advertisements. We do not seek competitive information illegally or in any improper way. We always keep the information of our customers, vendors and competitors confidential. We do not use customers' or competitors' employees as sources of non-public information. We do not discuss the confidential information of a former employer.

## GIFTS, ENTERTAINMENT, HOSPITALITY

We do not accept or offer anything of value (gifts, entertainment, meals) that may influence business decision or may seem inappropriate in any way. We never accept or offer anything of value (money, loans, kickbacks, etc.) in order to receive improper advantage and influence.

We may only accept symbolic gifts or meals which are appropriate under the circumstances.

## POLITICAL ACTIVITY

We are free to participate in political activities, including belonging to a political party and/or supporting a candidate, as long as the political activities are clearly separated from the activities related to our employment.

## MAKING COMMITMENTS ON BEHALF OF BIOMAPAS

When we enter into formal or informal agreements or sign documents on behalf of Biomapas, we can create legal obligations and financial risks for the company. No employee may approve any legal or other commitment without obtaining appropriate authority.

# PRINCIPLES

## COMMUNICATION, CONFIDENTIALITY AND DATA PROTECTION

### COMMUNICATION

We follow *Communication policy* and always assure professional and appropriate communication with all relevant interested parties. Our reputation depends on providing information that is timely, accurate and consistent.

### DATA CONFIDENTIALITY

We work according to the *Confidential Information* procedure. It is mandatory to protect and value confidential information that we create in the course of our work. Confidential information received from Customers, partners or third parties should be treated with the same care. We each sign a Confidentiality Agreement as part of our work with Biomapas. Confidential information includes but is not limited to general information about business, marketing and service plans, ideas, employee's information and any non-published financial data, projects documents, procedural documents and other.

Upon discovery, we immediately report any inadvertent disclosure of confidential information, misdirected email or mail package containing confidential information to our Manager and Quality Assurance. Then, we take steps to retrieve the information or have it deleted or destroyed by the recipient.

Violation of confidentiality will be investigated and may result in appropriate actions (e.g. reimbursement of losses).

When we leave Biomapas, we promptly return all documents, information and other materials relating to Biomapas services. We are prohibited from using any information or procedures relating to Biomapas or its customers for the benefit of ourselves. This obligation continues beyond the termination of the employment.

### PERSONAL DATA PROTECTION

We comply with local and EU regulations governing the collection, use, distribution, and security of any Personal Information we create, receive, maintain or transmit. Personal Information is any information that identifies, or when used in combination with other information identifies, individual or from which identification or contact information of an individual can be retrieved.

We follow *Data protection* procedure. We follow our internal and external requirements to respect privacy of trial subjects and patients and do not disclose patient-identifiable Personal Information.

# PRINCIPLES

## PATIENT SAFETY AND ETHICAL PRINCIPLES

### PROTECTION OF TRIAL SUBJECTS AND PATIENTS

We are committed to ensure that clinical trials conducted by us are scientifically valid, have an appropriate benefit-risk profile, sufficient informed consent process, adequate oversight and are approved by ethics committees. We follow globally accepted ethical and good practice principles described in the Declaration of Helsinki, ICH-GCP and GVP. Protecting safety of the clinical trial participant and the patient using marketed medicines is a primary concern of ours.





**BIOMAPAS**

Clinical Trials & Regulatory Solutions

A Code of Ethics is a listing of values and principles based on desired conduct. It is more than a set of rules and policies – it serves as a touchstone by which professional judgement can be made. Code does not cover all ethical dilemmas we may face. However, it can guide us to make the right choice.

If you have any questions related the Code, need any help or advice, please contact us at [quality@biomapas.eu](mailto:quality@biomapas.eu)