

"COMPLIANCE"

In accordance with MedTech Europe Code of Ethical Business Practice, with the legal and regulatory provisions in force, in particular the Monaco Law's n°1.362, 1.462 and n°1.503 relating to combating money-laundering, terrorist financing and corruption ; Decree n°2013-414 of May 21, 2013 on the transparency of benefits granted by companies producing or marketing products for human health and cosmetic purposes, adopted for the application of Article 2 of the Law n° 2011-2012 of December 29, 2011 on strengthening the health safety of medicinal products and health products ; Law no. 2016-1691 of December 9, 2016 on transparency, on combating corruption and the modernization of economic life; Decree No. 2020-730 of 15 June 2020 on the benefits offered by persons who manufacture or market products or health benefits taken for the purposes of Ordinance No. 2017-49 of January 19, 2017 on benefits offered by persons who manufacture or sell health products or services

Any person acting on behalf of ATLANTIS DIFFUSION SAM and/or AXIADIS SAM shall not seek to offer, give, authorise, ask for or accept any payment, service, present or compensation from a health professional (customer, supplier, etc.) in order to obtain or retain in an improper way a commercial benefit or to influence an administrative act.

The term compensation shall include, but not be limited to, the following: cash payment, donations, jobs opportunities, hobbies, gifts, subsidies, use of equipment or loans, without deposit agreement or contract, meals or payment of travels or accommodation or premises.

We undertake:

- not to disclose confidential information;
- to have a correct behaviour towards our colleagues, our hierarchy and, more generally, anyone with whom we are in contact (customers, suppliers, etc.);
- not to commit acts of corruption and to prohibit the granting of compensations in favour of a health professional so as to unduly obtain or retain a commercial benefit or to influence an administrative act;
- to never falsify or hide transactions or agreements;
- to communicate all information regarding our relationships with health professionals;
- to immediately inform ATLANTIS DIFFUSION SAM and/or AXIADIS SAM of any changes regarding the information provided, including any new third party which would be involved in promoting or presenting a product sold by ATLANTIS DIFFUSION SAM and/or AXIADIS SAM;
- to keep and provide adequate documentation in order to demonstrate the respect of the present « Compliance » for any payments, services and supplies of valuables in favour of health professionals;
- to conduct an appropriate due diligence of all individuals or entities which may be involved in ATLANTIS DIFFUSION SAM's and/or AXIADIS SAM's activities and ensure that they will be in conformity with the present « Compliance »;
- not to cooperate with contracting authorities before or during a public tender in such a way that might compromise the impartiality of the procedure.

The present « Compliance » shall be known and applied by all the employees, permanent or occasional, of our companies.

ATLANTIS DIFFUSION SAM and/or AXIADIS SAM reserve the right to take any necessary action in case of violation of compliance obligations, ethic and infringement of applicable codes of conduct, including the present « Compliance », as well as any other documents relating to standards and policies that may be communicated at a later stage.