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CODE OF CONDUCT

DESITIN ARZNEIMITTEL GMBH

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FOREWORD

DEAR DESITIN EMPLOYEES,

Do we even need a Code of Conduct?

We do not bribe or accept bribes and we certainly do not betray or accept discrimination or environmental offences. Quite the contrary: We have a tight mutual value system and behave in compliance with the law. Our interactions with all our partners and with each other are based on respect.

That is why it is so important that we summarise these values for ourselves as an internal guideline, but also document them confidently to the outside world. In our business relations we attach importance to working with partners who share these values.

We encourage you all to disclose any behaviours and/or actions that may deviate from our values and bring them to clarification. Details on the practice are defined in the Code. This is the only way to maintain and strengthen the ethical foundation on which our common company is built. It is an essential, if not the decisive factor for a successful common future.

We therefore ask you all to read our Code of Conduct and, above all, to take it to heart. Please do not hesitate to address any uncertainties regarding its comprehension or to point out any necessary additions. Design this Code together with us for the future, as a living document and a link within the company.

In this spirit we send you our best regards,

Your general management

PREAMBLE

COMMITMENT TO ETHICS AND COMPLIANCE

We commit ourselves to fulfilling our responsibility in all business, social and scientific matters.

We comply with the laws, regulations and ethical standards of the countries in which we operate or become active.

Our main focus is on people. We deal openly and act with social responsibility towards employees, colleagues and business partners.

We respect human rights, labour and social standards.

The responsible treatment of our nature and environment is important to us and determines our actions.

We are committed to responsible, transparent handling of donations of all kinds and to adherence to data protection.

This Code of Conduct documents that we want to live up to our social responsibilities.

We commit ourselves to its adherence.

We place our business partners under an obligation to adhere to our Code of Conduct.

This Code of Conduct not only helps us to comply with it, but also protects our business partners and us from disciplinary and legal action.

TERMS AND ABBREVIATIONS

AKG

In January 2008, the association "Arzneimittel und Kooperation im Gesundheitswesen" ("Medicinal Products and Cooperation in Healthcare" – AKG e. V.) started its work in Berlin. Pharmaceutical companies based in Germany have joined forces in this voluntary self-regulatory body in order to prevent infringements of the law through information, advice and training. The slogan of the association is therefore: Prevention before sanctions.

Bribery

Bribery is committed by anyone who offers, promises or grants an unfair advantage to an office holder (e.g. a holder of an electoral office, an official, a public service employee), a person specifically obliged to serve the public, a soldier of the German Armed Forces, an employee and (since 1 June 2016) a member of the professional circles in return for having performed an official act, or will do so in the future, that is of dishonest benefit for himself/herself or a third party.

Compliance

Compliance means adherence to laws, internal company guidelines and voluntary industry codes.

Corruption

Corruption is the mirror-image act on the receiving end if bribery is the active part of a crime.

Ethics

Ethics in the sense of this Code means morally impeccable action.

GxP

GxP summarises all guidelines for "Good Practice" which are particularly important in medicine, pharmacy and pharmaceutical chemistry. "G" stands for "good" and "P" for "practice". "x" is replaced by the abbreviation for the specific field of application. Examples: GMP = Good Manufacturing Practice, GLP = Good Laboratory Practice, etc.).

Members of the professional circles

Members of the professional circles within the meaning of this Code are members of the healthcare professions or industry, institutions serving human health, or other persons, insofar as they trade legally in prescription-only medicinal products or use them in the exercise of their profession.

CODE ADHERENCE GUIDELINE

This Code cannot predict all the situations that arise every day, nor answer every question that arises in day-to-day business. It therefore often remains abstract and relies on our ability to think abstractly ("to know what is meant"), our initiative and our sense of responsibility.

Wherever possible, the Code tries to give advice and help, referring to supervisors and colleagues who are particularly committed to helping identify and solve problems.

When we are faced with ethical problems, we first ask ourselves a few questions that help us to find the right answer:

- Is my behaviour legally and ethically correct?
- Could my actions compromise patient safety, product safety/quality or damage our reputation?
- Do my actions reflect our corporate culture?
- Do my actions comply with this DESITIN Code of Conduct, the Corporate Guidelines and process procedures?
- In marketing, in medicine, in sales: Do my actions also comply with the AKG Code of Conduct?
- Do I want to see my actions described in a publication with my name on it?
- How would our customers, owners and the public judge my actions if they learned of them?

If we are in doubt about a situation, we are never afraid to ask for advice. Each of us can find ourselves in a situation where it is difficult, especially under time pressure, to think about what to do and to define it correctly.

We are all required to know, understand and comply with all applicable laws, this Code and related policies and process procedures. Infringements may result in disciplinary action, termination without notice in serious cases, civil or criminal prosecution.

If we know or learn of an infringement, which can harm the reputation of DESITIN or has criminal relevance, but do not report it, also threaten disciplinary measures.

There are various bodies at DESITIN to which we can turn for advice and for help with the reporting of an infringement.

These are:

- Our direct supervisors
- In Marketing, Sales, Medical, Finance and Purchasing departments: our compliance officers
- Our directors
- Our Human Resources department
- Our general management
- Specifically designated responsible persons and representatives (e.g. data protection officer, compliance coordinator)
- Our trusted authority – trusted lawyer Pro Honore e. V. (in case of criminal law relevant anomalies, see chapter compliance (national)).

We all have the greatest interest in maintaining the integrity of our company.

General management and executives are there for us and will answer any questions that arise or solve a recognised problem together with us.

OUR EMPLOYEES

DYNAMICS AND INNOVATION

Our corporate culture combines innovation and tradition, short communication channels and long-standing responsibility for our employees. Today, we operate in a rapidly changing industry in which health policy conditions are constantly changing and becoming more difficult.

In order to achieve our corporate goals and continue to live up to our responsibility in the future, we are dependent on committed, creative and innovative employees. We promote a corporate culture in which we place trust in our employees and encourage them to contribute their suggestions and ideas. We require employees who are open to new ideas, have initiative and are willing to take on responsibility, who can think outside the box and who are motivated by a collegial and respectful working environment to reach above-average performance.

These are the qualities that make DESITIN an agile and flexible company with a high degree of integrity and customer orientation. And we want to become better and better!

We are offered a sustainable workplace, a pleasant working atmosphere, opportunities for further development as well as appropriate remuneration.

DIVERSITY

Our collegial working environment and attractive jobs enable us to attract and retain innovative and creative talents.

We adhere to the principles of equal opportunities in the workplace. Personnel decisions (e.g. hiring, selection, training, promotion and remuneration) are based on qualifications, experience and other work-related criteria.

We do not discriminate against anyone on the basis of gender, race, ethnic origin, religion or belief, disability, age or sexual orientation.

We expect all employees to treat their colleagues politely, objectively, fairly and respectfully, and to treat doctors, pharmacists, patients, suppliers and other business partners with impeccable manners.

WAGES AND FRINGE BENEFITS

We offer fair working conditions. This includes employee rights such as fair pay, equal pay for work of equal value and safe working conditions. We adhere to applicable laws on wages, benefits and working hours.

We pay at least the minimum wage and benefits laid down by law in the countries in which we work.

Wages are paid by bank transfer. Exceptions may apply in certain countries and cases. Wages are paid monthly. We do not apply wage deductions for disciplinary reasons.

Exceptional, self-initiated services that go beyond the requirements of the job description are additionally rewarded if the success of the company permits this.

SAFETY AND HEALTHY WORKPLACE

We are committed to creating a safe and health-promoting working environment. We provide our employees with a safe working environment that complies with applicable laws and regulations regarding health protection as well as occupational safety regulations and international standards.

We strive to develop and improve the working environment and our working conditions and adapt them to new developments.

We are continuously developing our occupational safety management system (OSM system). This regulates responsibilities, tasks, rights and duties. We thereby comply with regional and national regulations.

OCCUPATIONAL HEALTH AND SAFETY

We regularly analyse the work environment to identify and protect ourselves from potential physical, chemical and biological hazards. The same applies to health and occupational safety risks.

HAZARD INFORMATION AND TRAINING COURSES

We ensure that all employees are adequately trained and meet the work requirements in their areas of responsibility.

To protect ourselves, we are provided with safety information on possible risks at the workplace. This includes safety information on hazardous substances used, such as chemicals, medicinal products, active ingredients and intermediate products.

WORKING HOURS

We adhere to the legally regulated working hours.

HUMAN RIGHTS

We respect and comply with international human rights standards, in particular the United Nations Universal Declaration of Human Rights (UDHR).

FREEDOM OF EXPRESSION, SPEECH AND ASSEMBLY

We are granted freedom of association and co-determination rights in accordance with applicable laws and regulations.

OUR PRODUCTS

PRODUCT SAFETY AND PRODUCT QUALITY

Patient safety is our top priority. Therefore, we will comply with all applicable laws and regulations throughout the life cycle of our products through our research, development, manufacturing, warehousing and sales activities up to product discontinuation. We will always follow our internal guidelines and standard operating procedures and process procedures to protect patient safety and ensure the required product quality.

We apply only recognised scientific and quality management principles and comply with all applicable laws relating to good business practices that meet the standards of the pharmaceutical industry.

To ensure the continuous availability and the required degree of safety, quality and efficiency of our medicinal products, we have established a pharmaceutical quality assurance system in accordance with the requirements of the EU GMP guidelines and defined its basic principles of good manufacturing practice in the quality management manual. Adherence to the GxP principles is mandatory for all employees of the company.

We also expect our business partners and suppliers to establish recognizsed quality management procedures and to adhere to appropriate GxP principles to ensure our quality requirements.

We are open to an audit of our facilities by business partners and international health and monitoring authorities and are proud of our many years of successful audit history.

We take great care in accurately and conscientiously describing the indications and side effects of our medicinal products in order to enable healthcare decision makers to make their benefit-risk analysis on the basis of optimal information and to provide patients with the best possible information.

We are committed to the timely investigation, evaluation and resolution of quality and performance issues related to product quality and safety. Our commitment to public health also means that we take product complaints seriously and report and address them promptly and carefully. This includes responsibly responding to any indications on adverse drug reactions.

In accordance with our company's internal guidelines, we immediately report all potential adverse drug reactions to the qualified person responsible for pharmacovigilance.

If new findings or indications arise, we take all steps to ensure patient safety and work closely with the competent authorities.

We comply with the GCP (Good Clinical Practice) regulations when researching and developing our products. Our activities take into account all the provisions of the Helsinki Declaration. For each research project, we check whether the targeted research objectives are not also achievable through lower-risk research, whether the risks are justifiable in relation to the opportunities and align our approach accordingly.

COMPLIANCE (INTERNAL)

HONESTY

Honesty is an essential, non-negotiable part of our professional conduct.

We have a duty to the company to achieve its business objectives everywhere and with all our skill and commitment. We must not exploit business opportunities for ourselves or third parties that may arise from company information that we become aware of or have. We must not use our position at DESITIN for personal gain.

We must avoid any conflicts of interest that may arise at any time or place. Conflicts of interest are understood to mean the risk that personal interests are placed above company interests in order to achieve an advantage.

We therefore make every effort to strictly separate the interests of DESITIN and our private interests. This applies both to business partners who supply us and business partners whom we supply. Each of our actions or decisions is to be performed independently of personal advantages or extrinsic considerations. This applies without exception.

FRAUD

We insist that there must be no fraud at DESITIN. Deception, theft, misleading or concealment/omissions are also prohibited.

Examples:

- Embezzlement of assets or misuse of company property
- Incorrect expense reports
- Disclosure of business secrets
- Increase in turnover by shipping stocks that are known to be faulty
- Intentional inclusion of financial statements that are incorrect and do not comply with proper accounting principles

We must all be aware of the consequences of these actions; they are subject to strict disciplinary measures and, in serious cases, criminal prosecution.

ACCEPTANCE OF GIFTS

As a general rule, we are prohibited from accepting gifts – with the exception of low-value office items. We should inform our customers/suppliers/service providers of this prohibition so that gifts are not given to us from the outset.

If we nevertheless receive a gift, the recipient must complete the "receipt of benefits" form in full and hand it over to the management or head of Human Resources without delay. We then receive binding feedback on how to proceed with the gift. If the gift may not become our property, we are informed of this and the reasons explained.

Acceptance of monetary payments is prohibited without exception.

GIFTS TO BUSINESS PARTNERS

Gifts from us to business partners are only possible on "special occasions", but the special occasion for this group of people may be broader than for members of the professional circles. However, they too should not exceed the limit of €35.00 (incl. VAT).

Gifts worth €35.00 to €50.00 (incl. VAT) are possible in exceptional cases, but must be approved in advance by the general management.

For gifts to members of the professional circles: see chapter compliance (national).

CONFLICTS OF INTEREST WITH SUPPLIERS

Business relations with suppliers may only be initiated and continued on the basis of objective criteria. Established business relations must not be influenced by individual interests or personal material or immaterial benefits.

Personal material or immaterial benefits (gifts, payments, invitations or services) in return for preferential treatment of business partners must neither be offered, promised, granted or approved, nor demanded or accepted by us. DESITIN expects us to inform supervisors or general management about any promised preferential treatments or benefits.

CONFLICTS OF INTEREST WITH EMPLOYEES, CIVIL SERVANTS AND PUBLIC OFFICIALS

We do not grant any direct or indirect personal benefits to civil servants, company employees, public service employees or members of the professional circles in order to achieve preferential treatment for DESITIN. We strictly refrain from even suggesting or announcing such benefits.

PROHIBITION OF HARASSMENT

Harassment is not only a serious infringement of this Code, but also a conduct that is a criminal offence under the term "stalking" (Section 238 of the German Criminal Code (StGB)).

Harassment can be many things. It can range from solicitation or intimation of a sexual nature to situations in which hurtful behaviour leads to a hostile working environment. This includes insults, inappropriate, offensive jokes, gestures or slander, verbal and non-verbal threats, abuse and intimidation, mockery or assault.

We respect and defend the dignity of every human being and our differences. It is important that we report when we become a victim or witness of harassment in the workplace or at business events.

We are all responsible for ensuring that we do not tolerate such behaviour. If it is brought to light, it is severely punished.

NO RETALIATORY MEASURES

Retaliation against employees who seek advice in good faith, express concerns, report misconduct or provide information in an investigation are strictly prohibited at DESITIN.

COMPLAINTS

With an official complaint, we contact our direct supervisor or the Human Resources department. They are responsible for receiving and handling complaints. We formulate the complaint fairly and objectively without offending.

If the complaint is directed against the direct supervisor, the next-higher-level supervisor is our contact person.

A member of the works council may be called in to support or mediate in the event of a complaint.

We can also lodge our complaint directly with the works council, which in this case is obliged to seek redress from the employer if it considers the complaint to be justified.

The general management provides the following assurance: Anyone who lodges a complaint with DESITIN will not suffer any disadvantages. However, there is no protection for you if you infringe legal regulations.

If, regardless of our position, we retaliate against an employee who truthfully and in good faith reports an infringement, this will be severely punished.

BAN ON DRUGS AND ALCOHOL

Drug abuse poses a serious threat to our safety and health and endangers DESITIN's productivity.

It is therefore forbidden to possess or use illegal drugs or to abuse legal drugs (e.g. medication) at the workplace or on the premises, or to work under the influence of illegal drugs or the influence of alcohol. It is fundamentally prohibited to enter the premises when drunk. Alcohol consumption is prohibited on the entire premises; this includes work breaks.

This does not include the use of prescribed medication which may contain alcohol.

Other exceptions require general management approval and may be exceptionally granted, e.g. for a corporate event. If alcoholic beverages are served at an event, we maintain our personal integrity through moderate consumption.

DEALING WITH AND COOPERATION WITH PUBLIC AUTHORITIES

We also strive for good cooperation with the authorities. We will work with them on the basis of the applicable law in a spirit of trust. Therefore, we comply with all legal orders issued by state authorities, while at the same time exercising the legal rights of DESITIN.

Within the framework of an official investigation, representatives of public authorities or public officials can make specific enquiries to DESITIN. All persons working for DESITIN who are confronted with official enquiries (especially from criminal prosecution and supervisory authorities) or investigations must immediately involve the general management, cooperate and observe the relevant internal regulations.

POLITICAL ACTIVITIES

We can only engage in party politics on a private basis. Any political engagement or support of political parties – also in the form of donations or fees – in the name of DESITIN must always be approved by the general management. This also applies to any organisation of political events on the company premises or in the offices of DESITIN.

In health policy terms, DESITIN is committed to the right of patients to freedom of therapy and the best possible individual medicinal product supply. We demand fair framework conditions for medium-sized pharmaceutical companies in Europe.

NEPOTISM

We are all prohibited from placing orders for DESITIN with family members or other related parties (friends, good acquaintances) without the prior consent of our supervisors. Insofar as the supervisor is also not free from such relations, general management shall decide.

COMPLIANCE (NATIONAL)

FAIRNESS

We strive for fair and honest competition. Competitive advantages and turnover targets can be achieved through innovation, the price and quality of our products, and through our sense of responsibility, diligence and commitment, but never through unfair competitive practices. We tolerate neither bribery nor corruption.

DEALING WITH AND COOPERATION WITH MEMBERS OF THE PROFESSIONAL CIRCLES

We commit ourselves to complying with all applicable laws, regulations and industry codes when working with members of the professional circles.

Members of the professional circles within the meaning of this Code are members of the healthcare professions or industry, institutions serving human health, or other persons, insofar as they legally trade in prescription-only medicinal products or use them in the exercise of their profession.

Cooperation with them is subject to many laws and regulations which we know and which we must strictly follow.

We will not offer, promise or grant an advantage to any member of the professional circles in order to be unfairly preferred when prescribing and purchasing our products.

Since 1 June, 2016, an infringement of this rule has been punished with a prison sentence of up to three years or a fine (Section 299 a/b, Section 333 et seq. of the German Criminal Code (StGB)).

In order to document our demands on our conduct, DESITIN joined AKG e.V. (Berlin) in 2008 and thus committed itself in writing to complying with the AKG Code of Conduct.

The purpose of the association is to sustainably strengthen confidence in the integrity and credibility of the pharmaceutical industry by supporting and ensuring transparent, fair and loyal corporate conduct, particularly in the area of marketing, as an institution of self-regulation. Particular emphasis is placed on information on prescription-only medicinal products and their possible applications, the contents and methods of advertising for prescription-only medicinal products, and the cooperation between companies and members of the professional circles.

Further information can be found on the AKG website: www.ak-gesundheitswesen.de

With the AKG Guide, our Marketing and Sales department has at its disposal an easy-to-understand handbook that provides answers to the most important questions in our day-to-day business.

Our Compliance Officers and the Compliance Coordinator deal particularly intensively with the Code and the resulting questions and provide us with advice in the areas of Marketing, Sales, Medical, Finance and Purchasing.

For difficult questions that we cannot answer, we also have the lawyers of the AKG office in Berlin at our disposal, who can be contacted via the Compliance

Coordinator.

GIFTS TO MEMBERS OF THE PROFESSIONAL CIRCLES

A gift from us to a member of the professional circles is only permitted to a very limited extent. As an advertising gift (the Pharmaceutical Advertising Act calls it a "low-value small item" in Section 7) it may cost a maximum of €5.00 (including VAT). On "special occasions" a gift may not cost more than €35.00 (including VAT). A special occasion can be a round birthday, the appointment as chief physician or senior physician or retirement. Religious holidays (Easter and Christmas) are not considered a special occasion in the present sense.

CONFLICTS OF INTEREST IN THE CONTEXT OF BUSINESS RELATIONS WITH MEMBERS OF THE PROFESSIONAL CIRCLES

The rules explained in the previous section also apply to our relationships with members of the professional circles.

In addition, the AKG Code of Conduct applies – in particular to the following statements:

- The invitation to a working lunch
- Catering within events
- The ban on catering for accompanying persons
- Gifts

We comply with all provisions of the AKG Code of Conduct, which are explained in detail and in an understandable manner in the AKG Guidelines.

TRUSTED AUTHORITY – TRUSTED LAWYER

We report any irregularities which are relevant under criminal law to the general management, our direct supervisors or the Human Resources department.

In addition, our company's trusted authority, which is currently staffed by a trusted lawyer, is available to us for any conspicuous criminal law-related matters. This is currently Dr. jur. Malte Passarge.

We can reach him via:
Pro Honore e. V.
Große Johannisstrasse 19
20457 Hamburg
Germany
Phone: +49 (0)40 4142 5511–0
Email: passarge@pro-honore.de

On the homepage www.pro-honore.de further information can be found under the keyword "*Vertrauensstelle*" (trusted authority).

We can ask him to accept our report anonymously. In this case he is subject to the legal duty of confidentiality.

Dr Passarge will initially examine our reports in all cases from a legal point of view. If it turns out that our report is or could be based on a criminal offence, he will immediately inform our general management, who will take the necessary steps to clarify and remedy the reported situation.

If his check reveals that the reported anomaly is criminally irrelevant, no report is made. The matter is then closed.

If the reporter wishes, Dr Passarge explains to him/her why the facts in question are not relevant under criminal law.

COMPLIANCE (INTERNATIONAL)

FAIR PLAY

We are committed to complying with all laws of the countries in which we sell our products. This includes money laundering laws. We must not make arrangements or enter into agreements internationally that hinder normal competition.

In addition, we comply with all regulations and codes of conduct applicable in the respective country.

We document all payments to business partners abroad (as to German business partners) conscientiously and completely. We behave in such a way that no personal dependence, obligation or influence, or the appearance of such, arises.

We note that legislation can vary from country to country. In many countries it is illegal to share information about pricing, profit margins, costs and other sensitive data with competitors.

TRADE AND EXPORT CONTROLS

We respect all laws and regulations relating to export bans or trade restrictions such as economic sanctions, embargoes and boycotts.

PAYMENT TRANSACTIONS

We only do business with honest customers, suppliers or partners who do not support or carry out terrorist activities. Designated software is used to identify (potential) business partners with whom we are not allowed to cooperate ("sanctions list check").

We do not make payments to, or accept payments from, entities that are not involved in the transaction or that are not legally authorised to receive payments.

FINANCIAL INTEGRITY

We perform financial reporting properly and transparently and record all business transactions accurately, on time and in compliance with applicable laws.

We take a very responsible approach to documenting and storing documents, making sure that they are accurate and complete. Relevant documents for financial accounting must not contain false or misleading entries.

PROHIBITION OF FORCED LABOUR AND CHILD LABOUR

We reject all forms of child labour. We respect both the human rights provisions and the rights of children formulated by the International Labour Organisation (ILO).

The minimum age for employment is in accordance with the applicable national regulations and may not be less than 15 years, regardless of the type of work. The minimum age for employment or work which, because of its nature or the circumstances in which it is carried out, could endanger the health, safety or morals of young people must not be below 18 years old.

Where national or community legislation on child labour provides for a stricter framework, this takes precedence.

We are free to choose our employer. Any form of forced labour is prohibited. Any employee may terminate the contract. The retention of identity papers, passports, training certificates or other documents is prohibited.

Prisoner labour is accepted on the sole condition that it is voluntary and paid.

PROHIBITION OF ILL TREATMENT

Inhuman treatment, physical punishment, insult, harassment and psychological or physical coercion are prohibited.

ENVIRONMENT AND SUSTAINABILITY

We must all comply with applicable laws, regulations, industry codes of conduct and internal requirements.

SUSTAINABILITY

We are committed to environmental protection and the principle of sustainability. DESITIN is certified according to the ISO 50001 (Energy Management) standard. With this we want to continuously improve and reduce the impact on our environment.

OPERATION AND MAINTENANCE OF TECHNICAL EQUIPMENT

We ensure that the functional condition of technical equipment and rooms is guaranteed at all times. For this we follow the principle of preventive maintenance. This is ensured by regular internal maintenance and inspections and supported by manufacturers of technical equipment by regular external maintenance.

We aim to provide a safe working environment. We regularly analyse and evaluate hazardous chemical processes, pharmaceutical processes and technical equipment. By using the findings, we derive measures and contingency plans to minimise risks and avoid catastrophes as well as damage to the company and the environment.

ENVIRONMENTAL PROTECTION

We are committed to environmental protection and the principle of sustainability. Our goal is to protect the environment and the climate as well as the health and safety of every individual who works at DESITIN. We see the efficient use of existing resources as an important prerequisite for the careful treatment of the environment.

We are committed to contributing towards meeting the economic, ecological and social needs of present and future generations.

NON-DISCLOSURE AND PRIVACY

DESITIN protects and respects the confidentiality of information protected by copyright as well as the privacy of employees, patients and customers.

CONFIDENTIAL INFORMATION

We are committed to protecting trade and business secrets. With respect to such information, which is marked as confidential information or identifiable as such, there is a strict duty of confidentiality.

We are prohibited from making secret documents or other confidential information available to third parties without clear authorisation to do so, or from using confidential information for our own purposes or for the purposes of third parties. Confidential information includes, but is not limited to:

- Technical and business know-how relating to products
- Scientific data
- Clinical test data
- Product development data and inventions
- Patent applications
- Patent disputes
- Trademarks that have been applied for
- Services
- New concepts or technologies
- Business and marketing plans
- Sales and turnover figures
- Supplier and customer information

We are obliged to exercise special caution in handling confidential information entrusted to us by third parties and to implement the agreements made with us in this regard accordingly.

DATA PROTECTION

We comply with the data protection regulations in all countries in which we operate or become active.

We are committed to meeting the reasonable expectations of the privacy of those with whom we work. This includes doctors, pharmacists, customers, consumers and employees, among others.

Please contact our executives or our data protection officer to ensure that you comply with the applicable regulations in case of doubt.

MODERN COMMUNICATION AND ITS LIMITS

We must always use good judgement and common sense, act ethically, legally and professionally and follow all company policies when accessing and using content by utilising the technology, devices or services provided by the company.

Except in cases required by law, we do not acquire a data protection guarantee for information sent to, from or stored on corporate systems. Subject to local laws, all documents, including electronic correspondence, are liable to review or monitoring at all times to ensure compliance with business or legal requirements.

HANDLING AND COOPERATION WITH THE MEDIA

Our reputation also depends on the public image conveyed by the media. Therefore, it is essential for our public image to show a consistent public appearance and answer questions truthfully.

All enquiries from the media are passed on by us to the general management. We are not permitted to make written or oral statements to media representatives in the name of, or about, DESITIN without the consent of DESITIN.

Publications, lectures and interviews that are related to DESITIN must also be agreed with the general management in order to maintain a uniform public image.

When – after receiving permission – we talk about our business with media representatives or in public, we should always rely on our good judgement. If we have concerns about certain media enquiries, the general management will provide us with all the necessary information and assistance.

SOCIAL NETWORKS

In today's society, social networks and social media in general are an effective and versatile means of creating and sharing content, opinions, insights, experiences and perspectives with a variety of people.

We are not permitted to make statements on Internet forums and networks on behalf of DESITIN without the consent of the general management. Similarly, we are not permitted to make statements that merely identify employment at DESITIN if they involve the risk of damaging the public image of DESITIN.

DOWNLOADS

We must not use the technological possibilities of the company in such a way that copyrights are infringed.

If company electronic devices (e.g. computers, smartphones, tablets, servers, websites, applications) are used, we may not download and/or store copyrighted material, post copyrighted material, transmit copyrighted material to others or burn copyrighted material to storage devices using company resources, unless the copyright-protected material is appropriately licensed.

Copyright-protected material includes software, files containing images, artistic works, live images or graphics, computer games, films and music, as well as video files.

In cases of doubt, we consult the IT department (information management) or our supervisors.

ETHICS AND COMPLIANCE STANDARDS FOR SUPPLIERS

We inform our suppliers about our Code of Conduct. This Code of Conduct is also intended to support our suppliers in experiencing and implementing our corporate culture. In this way, we also oblige our suppliers to live up to our responsibility in all business, social and scientific matters.

We expect our suppliers to provide all services in accordance with this Code of Conduct. We also expect our suppliers to comply with all laws, regulations and ethical standards of the countries in which they operate.

We also insist that our suppliers respect human rights as well as labour and social standards. We expect our suppliers to treat our nature and environment responsibly.

This Code of Conduct is binding for all suppliers of DESITIN Arzneimittel GmbH. We will support our suppliers in successfully implementing this Code of Conduct and fulfilling their obligations.