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ANTI-CORRUPTION PROGRAM CPC BIOCON LLC

Version 3, implemented on 02 August 2021
Valid through 02 August 2023

Status	Position	Full name	Signature	Date
Developer	Anti-Corruption Authorized Person	V.S. Stopykin		23-07-2021
Agreed	Deputy Head of Drug Quality Assurance	T.I. Shabatura		23-07-2021

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ANTI-CORRUPTION PROGRAM OF CPC BIOCON LLC version 03 of 02 August 2021

By this Program, CPC Biocon Limited Liability Company (hereinafter referred to as the "Company") declares that its employees, officials, the head and founders (participants) in their internal activities as well as in legal relationship with business partners, governmental authorities, local self-government authorities shall be guided by the principle of "zero tolerance" to any manifestations of corruption and will take all measures prescribed by law to prevent, detect and combat corruption and related actions (practices).

GENERAL PROVISIONS

1. The Anti-Corruption Program of CPC Biocon LLC (hereinafter referred to as the "Program") is a set of rules for detecting, combating and preventing corruption and meeting requirements of anti-corruption legislation in the activities of the Company.

2. The Program has been developed in compliance with the Law of Ukraine "On Preventing Corruption" No. 1700-VII dated 14 October 2014 (hereinafter referred to as the "Law") and Standard Program approved by decision of the National Agency on Corruption Prevention, other legislation of Ukraine, articles of association, internal documents of the Company and taking into account generally accepted principles and norms of international law in the field of anti-corruption.

3. The purpose of Program implementation is as follows:

- ✓ ensuring compliance of the Company's activities with the requirements of anti-corruption legislation;
- ✓ development of a unified approach to ensuring the work of detecting, combating and preventing corruption at the Company;
- ✓ minimization of the risk of involving the Company and Company's employees in corruption activities;
- ✓ prevention of corruption and ensuring responsibility for corruption offenses;
- ✓ establishment of the obligation of the Company's employees to know and meet the requirements of this Program and the norms of anti-corruption legislation.

SCOPE

1. The Program shall be binding upon all employees of the Company, including officials of all levels, a General Director, founders (participants), as well as upon all economic entities (branches, subdivisions and subsidiaries) which it controls.
2. The Program shall also be used by the Company in its legal relationship with business partners, including governmental authorities and local self-government authorities.
3. Measures for the fulfillment (implementation) of the Program within personal powers shall be carried out by:

✓ founders (participants) of the Company [hereinafter referred to as the "founders (participants)"];
✓ head of the Company (hereinafter referred to as the "head");
✓ official of the Company held responsible for the implementation of the Program (hereinafter referred to as the "Authorized Person"), the legal status of whom shall be determined by the Law and the Program;
✓ Company's officials of all levels and other employees of the Company (hereinafter referred to as the "employees").

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PROHIBITION OF CORRUPTION

1. The Company ensures the development and implementation of measures that are necessary and sufficient to prevent, detect and combat corruption in its activities.
2. In its activities, the Company does not allow corruption in any form. Under no circumstances shall all persons covered by the Program directly or through intermediaries participate in or facilitate the commission of any corruption or corruption-related offenses.

ANTI-CORRUPTION MEASURES, STANDARDS AND PROCEDURES

1. Anti-corruption measures shall include:

- periodic assessment of corruption risks in the activities of the Company;
- anti-corruption standards and procedures in the activities of the Company.

2. The main anti-corruption standards and procedures of the Company are:

- familiarization of new employees with the content of the Program, conduct of training events on matters of preventing and combating corruption;
- anti-corruption inspection of business partners;
- regulations on mandatory compliance with the Program;
- criteria for selecting business partners of the Company;
- restrictions on the support of political parties by the Company, the implementation of charitable activities;
- mechanism of reporting the detected signs of violation of the Program, signs of committing a corruption or corruption-related offense, as well as the confidentiality of such reports and the protection of whistleblowers;
- implementation of anti-corruption functions by the Authorized Person and employees;
- the procedure for reviewing reports of whistleblowers, including internal investigation and disciplinary action;
- norms of professional ethics and duties and prohibitions for employees;
- mechanisms for preventing and resolving conflicts of interest;
- restrictions on gifts;
- supervision and control over meeting the requirements of the Program.

3. Norms of professional ethics of employees.

3.1. An important element of anti-corruption activities is the introduction of norms of professional ethics in the corporate culture of the Company, the establishment of rules and standards of conduct governing the general ethics of business relations, which are aimed at forming ethical and conscientious conduct of employees in general. To this end, the Company has implemented the **Code of Corporate Ethics of the Company**, which, among other things, includes anti-corruption standards of conduct of Company's employees.

3.2. Provisions on the need to meet the requirements of the Program shall be included in the employment contracts of the Company and the internal labour regulations of the Company.

4. Norms of professional ethics of Company's employees.

4.1. Employees of the Company shall, in the performance of their duties, strictly adhere to generally accepted ethical standards of conduct or the requirements of the Company's Code of Ethics.

4.2. Employees of the Company shall be tolerant and respectful of the political views, ideological and religious beliefs of others, and shall not to use their powers in the interests of political parties and/or politicians.

4.3. Employees of the Company shall act impartially, regardless of personal interests, personal attitude to any persons, their political views, ideological, religious or other personal views or beliefs.

4.4. Employees of the Company shall conscientiously, competently, timely, effectively and responsibly perform their respective functional duties, decisions and instructions of the bodies and officials to whom they are subordinated, accountable or by whom they are controlled, as well as prevent abuse and inefficient use of funds and property of the Company.
4.5. Employees of the Company shall not disclose or use in any other way confidential information that became known to them in connection with the performance of their duties, except as prescribed by law.
4.6. Employees of the Company shall, irrespective of personal interests, refrain from implementing decisions or instructions of the Company's management if they pose a threat to the rights protected by law, freedoms or interests of certain individuals, legal entities, state or public interests or contradict the law.
4.7. Employees of the Company shall independently assess the legitimacy of the decisions or instructions provided by management and the possible damage that will be caused in the event of execution of such decisions or instructions.
In the event of receiving decisions or instructions for execution, which an employee of the Company considers illegal or posing a threat to the rights protected by law, freedoms or interests of certain individuals, legal entities, state or public interests, he/she shall promptly report it in writing to his/her immediate supervisor, or the General Director of the Company, or its founders (participants) and the Authorized Person.

5. Principles of interaction with counterparties

5.1. The Company shall not use counterparties to perform any illegal actions.
5.2. The Company shall make efforts to minimize the risk of cooperation with contractors with questionable business reputation. For this purpose, the Company shall introduce inspections of counterparties for their business reputation, legal and financial reliability.
Counterparties shall be inspected in order to preliminary assess the possibility of entering into a contract with the counterparty of the Company.
The responsibility for organizing the inspection shall rest with a lawyer.
To conduct an inspection, the following shall be submitted:

- Identification code of the legal entity (EDRPOU code);
- Articles of association and (or) another document that regulates the establishment and operation of the legal entity;
- Tax identification number (TIN) of the private entrepreneur.

If the inspection reveals information that indicates or may indicate potential legal, ethical, reputational risks to the Company, the lawyer shall make a relevant note, which is subject to consideration by the General Director with a further decision on this contractor.
5.3. When selecting counterparties, the Company shall take into account that the legislation of Ukraine establishes restrictions on part-time and combination of jobs as well as restrictions related to the termination of activities for persons duly authorized to perform the functions of state or local self-government. The Company shall not make transactions in the field of entrepreneurship and shall not enter into employment agreements (contracts) that would violate such restrictions.
5.4. The Company has an anti-corruption clause on the obligation to comply with anti-corruption legislation to be incorporated in contracts with counterparties. At the same time, it is allowed to incorporate in contracts a similar anti-corruption clause proposed by another party to the agreement. When negotiating with counterparties, the Company shall insist on the need to include the anti-corruption clause in agreements. The draft anti-corruption clause shall be Appendix 1 to this Program.
5.5. Charity.

5.5.1. It shall be prohibited to offer or provide charitable assistance in the activities of the Company in order to provide illegal benefits. Charitable assistance shall be provided without agreement or intention to receive any tangible benefit or anything valuable in exchange for such assistance. The Company shall provide charitable assistance in accordance with the norms of Ukrainian legislation, taking into account the above-mentioned provisions on a conflict of interest and inspection of counterparties.

RIGHTS AND OBLIGATIONS OF THE FOUNDERS (PARTICIPANTS) AND EMPLOYEES (EXCEPT THE AUTHORIZED PERSON) OF THE COMPANY AND LIMITS ON HOSPITALITY (GIFTS)

1. Founders (participants), the head, employees and other persons acting on behalf of the Company shall have the right to:
- provide proposals for improving the Program;
- approach the Authorized Person for consultations on the implementation of the Program and clarifications on its provisions.

2. The founders (participants), head and employees of the Company shall:
- meet with the relevant requirements of the Law, the Program and related internal documents as well as ensure the practical implementation of the Program;
- perform their direct duties taking into account the interests of the Company;
- immediately inform the Authorized Person, General Director or founders (participants) of the Company about cases of violation of the Program (or cases of incitement to such actions), commission of corruption or corruption-related offenses by other employees of the Company or other natural persons or legal entities with which the Company is or plans to be in a business relationship;
- immediately inform in the manner prescribed by the Program about the occurrence of a real or potential conflict of interest;
- refrain from the conduct that could be interpreted as willingness to commit a corruption offense connected with activities of the Company;
- not commit and not participate in the commission of corruption offenses connected with activities of the Company;

3. Employees and General Director of the Company shall not be allowed to:
- use their official powers or position and related opportunities in order to obtain illegal benefit for themselves or others;
- use any property of the Company or its funds in private interests;
- demand or receive any tangible or intangible benefit (for themselves or their close persons) in connection with the performance of their official duties, which is not provided for in the employment or other agreement between them and the Company;
- organize, be an intermediary or personally make any cash or cashless payments or settlements with business partners of the Company, if such payments or settlements are not prescribed by current legislation;
- either directly or indirectly influence the decisions of the Company's employees in order to obtain any tangible or intangible benefit for themselves or for their close persons, which is not provided for in the employment or other agreement between them and the Company;
- take any actions that directly or indirectly incite other employees, the General Director of the Company to violate the requirements of the Law or the Program.

4. Upon dismissal or other termination of cooperation with the Company, a person shall be prohibited from disclosing or otherwise using in his/her interests (confidential) information, which became known to him/her in connection with the performance of his/her powers, contractual obligations, except as prescribed by law.

5. Extortion, request and receipt of gifts for themselves or third parties from legal entities or natural persons by employees, the General Director of the Company (directly or through others) in connection with the performance of their duties or their position and related opportunities shall not be allowed.
6. Employees, the General Director may accept gifts that correspond to generally accepted notions of hospitality (for example, gifts in the form of souvenirs, food and beverages, invitations to entertainment events, reimbursement of transportation and hotel accommodation costs), except as provided for in this Program, if the cost of such gifts does not exceed in value the equivalent of 50 (fifty) US dollars.
7. The restriction on the value of gifts provided for in this paragraph shall not apply to gifts that are:
- presented (made) by close persons;
- received as discounts on goods, services, winnings, prizes, awards, bonuses accessible to everyone.
8. In case of detecting a gift in respect of which there is a prohibition to receive it, in the office, as well as in case of receiving a gift offer, employees, the head of the Company shall immediately, but no later than one business day, take the following measures:
- refuse the offer;
- if possible identify the person who made the offer;
- involve witnesses, if possible, including those from among the employees of the Legal Entity;
- inform in writing about the proposal of the Authorized Person and immediate General Director (if any) or the General Director of the Company.
9. An act shall be drawn up on the discovery of property that may be an illegal benefit or gift, which shall be signed by the person who has discovered the illegal benefit or gift, and by the Authorized Person or his/her immediate supervisor or Deputy General Director of the Company.
10. If the property, which may be an illegal benefit, or a gift is discovered by a person who is the General Director of the Company or Authorized Person, the act of discovery of such property shall be signed by this person or the person duly authorized to perform the duties of the General Director of the Company in the event of his/her absence.
11. Employees, the General Director as well as persons acting on behalf of the Company shall refrain from offering gifts to civil servants, people's deputies of Ukraine, members of local councils, their close persons, actual or potential business partners, their employees or representatives, as well as from any other conduct, which can be interpreted as willingness to commit a corruption offense related to the activities of the Company.
12. The general policy of the Company concerning offers of gifts on behalf of the Company within the framework of generally accepted notions of hospitality shall be defined by the head, taking into account requirements of the legislation.
13. Employees and the General Director of the Company shall notify the Authorized Person in writing within one business day of each fact of offering a gift or receiving a gift within the framework of generally accepted notions of hospitality.

RIGHTS AND OBLIGATIONS OF THE AUTHORIZED PERSON AND HIS/HER SUBORDINATES (IF ANY)

1. The Authorized Person of the Company shall be appointed by the founders (participants) or its head in accordance with the labour legislation and constituent documents of the Company.
2. Authorized Person may be an individual who is capable, according to his/her business and moral qualities, professional level, health, to carry out the relevant duties.
3. A person shall not be appointed to the position of the Authorized Person in the presence of circumstances referred to in part three of Article 64 of the Law.

4. The work on positions referred to in paragraph 1 of part one of Article 3 of the Law as well as any other activity that creates a real or potential conflict of interest with the activities of the Company shall be incompatible with activities of the Authorized Person.
5. In the event of occurrence of incompatibility circumstances, the Authorized Person shall be obliged to notify the General Director of the Company of it within two days from the day such circumstances occur with simultaneous submission of application for termination of employment contract on his/her own initiative.
6. The Authorized Person may be dismissed early in cases provided for in part five of Article 64 of the Law.
7. The main tasks of the Authorized Person shall be to prepare, ensure the implementation and control over the implementation of measures to prevent, combat and detect corruption at the Company.
8. The Authorized Person shall directly exercise his/her rights and duties. The Authorized Person may involve (with the consent of the General Director) other employees of the Company in the performance of his/her functions.
9. The performance of the Authorized Person's functions by the Authorized Person at the Company is independent. Interference in the activities of the Authorized Person by employees, founders (participants), head, business partners of the Company as well as other persons shall be prohibited.
10. It shall be prohibited to impose duties on the Authorized Person that do not belong to or go beyond his/her powers as defined by the Law and the Program, or which limit the performance of his/her powers.
11. The founders (participants) and General Director of the Company shall:
- ensure proper material and organizational labour conditions for the Authorized Person;
- contribute to the performance of functions provided for in the Law and the Program by the Authorized Person;
- promptly respond to written and verbal requests, proposals and recommendations of the Authorized Person provided by him/her within the implementation of the Program;
- at the initiative of the Authorized Person, send inquiries to governmental authorities, local self-government authorities, companies, institutions and organizations, regardless of their form of ownership, in order to receive the relevant information and materials from them that are necessary to perform the tasks assigned to the Authorized Person.
12. The Authorized Person, in order to perform the tasks assigned to him/her, shall:
- perform his/her functions objectively and impartially;
- organize the development of internal documents of the Company on matters of elaboration and implementation of the Program;
- develop and submit for approval to the General Director the internal documents of the Company on matters provided for in the Program;
- ensure supervision, control and monitoring of observance by employees and the General Director of the Company of the Law and the Program;
- assess the results of implementing the measures envisaged by the Program;
- ensure the development of a report on the progress of Program implementation;
- ensure cooperation with persons who report possible violations of the requirements of the Program, commission of corruption or corruption-related offenses in good faith;
- ensure the formulation and submission to the head of proposals for the plan of inspections of meeting the requirements of the Program;
- participate in the conduct of inspections and internal investigations conducted in accordance with the Program;
- participate in the periodic assessment of corruption risks in the activities of the Company;
- ensure the development and maintenance of registers of:

- employees of the Company brought to responsibility for violating the requirements of the Program, committing a corruption offence or corruption-related offence;
- contributions made by the Company to support political parties and charitable activities;
- inspections conducted in accordance with the Program;
- internal investigations and inspections conducted in accordance with the Program;
- reports of conflict of interest and violations of the requirements of the Program, commission of a corruption offence or corruption-related offence;

- organize and conduct anti-corruption inspection of Company's business partners;
- ensure the confidentiality of information and protection of employees, who have reported violations of the Program, commission of a corruption offence or corruption-related offence;
- provide the founders (participants), General Director and employees of the Company with explanations and consultations related to the application of the Program;
- ensure public awareness of the measures taken by the Company to prevent corruption;
- participate in cooperation with governmental authorities, local self-government authorities, other legal entities, non-governmental and/or international organizations on the prevention of corruption;
- organize advanced training events for employees of the Company on matters related to the prevention of corruption;
- participate in the procedures of Company's personnel selection;
- perform other duties provided for in the Law, Program and employment contract.

13. The Authorized Person, in order to perform the tasks assigned to him/her, shall have the right to:

- receive written and verbal explanations from employees and the General Director of the Company on matters related to the assignment of powers to him/her (including during periodic assessment of corruption risks, anti-corruption inspections of business partners, inspections, internal investigations and expert examination);
- receive from subdivisions of the Company the information and materials (certified true copies of financial, accounting and legal documents, internal official correspondence) concerning activities of the Company, including documents related to the procurement (or participation in the procurement) of the goods, works or services, in competitions, etc.

14. If necessary, the Authorized Person shall be granted access to the original documents, copies of which were provided to him/her. In cases of inexpediency of making a significant number of copies of documents, the Authorized Person may, by decision of the head of the subdivision, submit the originals of the relevant documents, which shall be returned within 5 business days after completion of the event by him/her for which they were requested;

- receive draft financial, organizational and administrative documents, agreements for their inspection for the presence of corruption risks;
- be granted access to warehouse and production premises of the Company, carry out control measures on them;
- be granted access to the electronic data storage and processing media available at the Company and, if necessary, demand registration of the relevant data on the certified paper medium;
- involve employees of the Company in the performance of the functions with the consent of the head;
- initiate requests to governmental authorities, local self-government authorities, companies, institutions and organizations of all forms of ownership in order to obtain information and materials related to the activities of the Company from them;
- initiate the issue of bringing employees and the General Director to responsibility, including the dismissal from current positions in accordance with the law;

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- approach founders (participants) and the General Director for the implementation of personal powers and performance of duties in accordance with the provisions of the Program;
- exercise other rights prescribed by the Law, Program, employment contract and job description.

PROCEDURE FOR REPORTING BY THE AUTHORIZED PERSON TO THE FOUNDERS (PARTICIPANTS) OF THE COMPANY

1. The Authorized Person shall develop a report on the results of the Program implementation (hereinafter referred to as the "Report") at least once a year within the term and in the manner determined by the founders (participants) or the head.

1.1. The Report shall include information on:
- the state of taking measures defined by the Program;
- the results of introducing measures defined by the Program;
- identified violations of the requirements of the Law, Program and measures taken to eliminate such violations;
- the number and results of inspections and internal investigations;
- facts of impeding the proper performance by the Authorized Person of his/her functions, establishment of unreasonable restrictions for him/her, cases of interference in his/her activities by third parties;
- proposals and recommendations available.

2. If necessary, the content of the Report submitted shall additionally be discussed by the Authorized Person with the founders (participants) or the head of the Company.

NOTIFICATION AND CONSULTING, SUPERVISION

1. The Authorized Person shall supervise and exercise permanent control of compliance with the Program by employees and the General Director of the Company.

2. Supervision and control over the compliance with the Program shall be exercised by the Authorized Person in the following forms:
- review and response to reports of violations of the Program, commission of corruption or corruption-related offenses;
- conduct of scheduled and unscheduled inspections of activities of the Company's employees regarding the fulfillment (implementation) of the Anti-Corruption Program;
- expert examination of organizational and administrative, legal, production and financial documents as well as drafts of these documents.

3. The Company shall ensure the development of the appropriate level of qualification of employees in the field of anti-corruption. To this end, all new employees of the Company shall be trained in accordance with the requirements of the Program, related documents and provisions of anti-corruption legislation. Such training shall be conducted on a regular basis for current employees.

4. The Company expresses its willingness to assist in the organization of training in accordance with the requirements of the Program, related documents and provisions of anti-corruption legislation for the Company's counterparties.

5. Employees of the Company shall read the Program and confirm in writing their readiness to meet the requirements of the Program.

The text of the Program shall be placed in open access for all employees of the Company on the website: http://www.biocon-bc.com/

6. Employees of the Company and other persons covered by the Program, who doubt the compliance of their actions with the requirements of the Program and/or anti-corruption legislation, may apply for individual clarifications (consultation) to the Authorized Person.

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TERMS OF CONFIDENTIALITY OF REPORTING VIOLATIONS OF ANTI-CORRUPTION REQUIREMENTS TO THE AUTHORIZED PERSON BY EMPLOYEES

1. Employees of the Company shall be guaranteed the confidentiality of their reports to the founders (participants), General Director or the Authorized Person on detected signs of violations of the Program, corruption or corruption-related offenses in the activities of other employees of the Company and reports of incitement to corruption or corruption-related offenses.
2. Reports of identified signs of Program violations as well as reports of incitement of Company's employees to commit corruption or corruption-related offenses may be made verbally or in writing through communication channels determined in the Anti-Corruption Program. Reports may also be made by employees and officials of the Company's business partners.
3. The General Director shall ensure 24/7 operation of the aforementioned communication channels and their protection from external interference and leakage of information.
4. Submission of knowingly false reports shall not be allowed.
5. Reports from employees of the Company of detecting signs of corruption or corruption-related offenses may be anonymous.
6. An anonymous report of detecting signs of corruption or corruption-related offenses may be considered only if the information contained in it relates to a certain employee of the Company or business partners of the Company and contains verifiable factual data.
7. Information contained in the report shall be verified by the Authorized Person, and if the report concerns the actions of the Authorized Person himself/herself – by an employee designated by the founders (participants) or the head.
8. Any data that makes it possible to identify the person, who has reported to the Authorized Person about the facts of incitement to commit a corruption or corruption-related offense or about the detection of signs of violating the requirements of the Anti-Corruption Program, commission by employees or other persons of corruption or corruption-related offenses, shall be the confidential information and protected pursuant to the law.
9. The Authorized Person and the persons involved by him/her in the verification of the information contained in the report shall not have the right to disclose it.
10. In case of reasonably justified suspicion of violating the requirements of the Program, the Company shall conduct an internal investigation according to the decision of the General Director of the Company.

RESOLUTION OF A CONFLICT OF INTEREST IN THE ACTIVITIES OF COMPANY'S EMPLOYEES

1. Employees of the Company shall, no later than the next business day from the day when they learned or should have learned about the existence of a real or potential conflict of interest, report to their immediate supervisor about it in writing, not take action or make decisions in the case of a real conflict of interest and take measures to resolve a real or potential conflict of interest.
2. In the event of a real or potential conflict of interest, the General Director of the Company shall inform the Authorized Person and the founders (participants) about it in writing.
3. In the event of a real or potential conflict of interest, the Authorized Person shall notify the General Director of it in writing.
4. The immediate supervisor of the person shall, within two business days after receiving a notice of existence with his/her subordinate of an actual or potential conflict of interest, take a decision on the method of resolving the conflict of interest and notify the employee accordingly.
5. The immediate supervisor, who became aware of a conflict of interest with his/her subordinate, shall be obliged to take statutory measures to prevent and resolve a conflict of

interest (including in the case of independent discovery of a conflict of interest with a subordinate without relevant notification by the latter).

6. A conflict of interest shall be resolved through one of the following measures:
- removal of an employee from performance of task, performance of actions, decision-making or participation in decision-making;
- establishment of additional control over the employee's delivery of the relevant task, performance of certain actions or decision-making;
- restrictions on the employee's access to certain information;
- review of the scope of employee's functional responsibilities;
- transfer of an employee to another position;
- dismissal of an employee.

7. The procedure for taking measures to resolve a conflict of interest and its peculiarities for different categories of employees of the Company shall be established by the Authorized Person.

8. A decision on resolving a conflict of interest in the activities of the General Director of the Company shall be made by founders (participants).

9. Employees of the Company may independently take measures to resolve a conflict of interest by depriving them of the relevant private interest with the provision of supporting documents to the immediate supervisor and the Authorized Person. Deprivation of private interest shall exclude any possibility of its concealment.

PROCEDURE FOR PROVIDING EXPLANATIONS AND CONSULTATIONS TO EMPLOYEES BY THE AUTHORIZED PERSON

1. If there are any questions regarding the interpretation of certain provisions of the Program, the founders (participants), head and employees of the Company may approach the Authorized Person for verbal or written explanation.

2. The essence of the request for the provision of explanation or consultation shall be disclosed directly to the Authorized Person (on the days and hours of personal reception scheduled by the Authorized Person) or by submitting an office memo in his/her name or sending a written request to his/her e-mail address in any form.

3. The Authorized Person shall provide a verbal explanation during a personal reception or in writing – no later than within 5 business days upon receipt of the request.

4. The Authorized Person may extend the term for consideration of the request, but no more than by 10 business days, which shall be communicated in writing to the person who requested explanation.

5. If during the explanation the Authorized Person detects signs of violation of the Anti-Corruption Program or signs of committing a corruption or corruption-related offense, he/she shall initiate an internal investigation before the General Director in the manner prescribed by the Program.

APPLICATION OF DISCIPLINARY RESPONSIBILITY MEASURES TO EMPLOYEES VIOLATING THE ANTI-CORRUPTION PROGRAM

In the presence of information certifying signs of employees' violation of the requirements of the Program, the following measures shall be taken:
- an internal investigation shall be appointed in accordance with the procedure established by the Program in order to confirm or refute the information about a possible violation;
- if there are sufficient grounds in accordance with the results of the internal investigation, the General Director shall impose a disciplinary action in accordance with the law.
- disciplinary actions shall be imposed by the General Director on employees of the Company in accordance with the norms of labour legislation.

IMPLICATIONS OF ANTI-CORRUPTION PROGRAM VIOLATION

1. Any violation of the requirements of the Program, including failure to report actual and possible violations of the Program and/or anti-corruption legislation, may be qualified as a violation of labour discipline and lead to the application of disciplinary measures (penalties), including, in some cases, dismissal in accordance with the legislation of Ukraine. Some of the actions prohibited by this Program may entail administrative and/or criminal liability under Ukrainian law.
2. Compliance with the requirements of the Program by the employees of the Company shall be taken into account when deciding on incentives and promotion.

MONITORING AND REPORTING, AMENDMENT PROCEDURE

1. The General Director of the Company shall ensure the organization of feedback mechanisms and other internal processes aimed at Program maintenance and continuous improvement.
2. The content of the Program can be viewed based on the results of:
- report on assessing corruption risks in the Company's activities;
- supervision and control over the observance of the Program as well as assessment of the results of implementing the measures envisaged by it;
- analysis of the practice of the Authorized Person's performance of his/her official duties;
- conducting survey by the Authorized Person, discussion and consultation with employees, the head and founders (participants) of the Company as well as with business partners of the Company to improve the Program.
3. The Authorized Person, as well as the founders (participants), General Director and employees of the Company may be the initiator of amendments to the Program.
4. Proposals for amendments to the Program shall be submitted to the Authorized Person, who studies and systematizes them.
5. The head, having received a summary of proposals for amendments to the Program from the Authorized Person, shall initiate an open discussion by the labour collective and, if necessary, the founders (participants).
6. In cases when the founders (participants) or the Authorized Person insist on urgent amendments to the Program, the head shall, as soon as possible but no later than 10 days upon receipt of such proposals, initiate the relevant discussion.
7. As a result of approval of the proposals by the General Director and in some cases by the founders (participants) and employees (labour collective) of the Company, the General Director shall approve the relevant amendments to the Program, which are an integral part hereof.

V.S. Stopykin
23-07-2021

T.I. Shabatura
23-07-2021

V.V. Pavlova
23-07-21

Appendix 1
to the Anti-Corruption Program
CPC BIOCON LLC

Anti-corruption clause

The Law of Ukraine "On Prevention of Corruption" and the Anti-Corruption Program prohibit any corrupt payments, offers, promises, gifts or approvals of payments or the transfer of any values or benefits either directly or indirectly to any Civil Servant or any other legal entity or natural person, if it is known that all or part of such payments, values or benefits will be offered, given, promised or transferred to the Civil Servant and/or other legal entity or natural person in order to influence the actions or decisions of the Civil Servant and/or other legal entity (represented by the head, deputy head, accountant or authorized person) or a natural person in his/her position; incline any legal entity or natural person to act or omit in breach of the legal obligation of such legal entity of natural person, provide any undue advantage, and incline to use influence on the actions or decisions of a public authority or any other body/company in respect of any activities performed in connection with the Agreement.