



CODE OF CONDUCT

Think Innovation. Feel Life.®





COMPLIANCE, CORE OF OUR CULTURE

Message from the CEO	i
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Introduction to our Code of Conduct

Our Purpose	2
Our Mindsets	4
R&D Integrity	6
Social Engagement	8
Responsibilities	10

Working with Customers and Suppliers

Patient Safety	14
Patient Interactions	16
Healthcare Interactions	18
Gifts and Business Hospitalitys	20
Improper Payments	22
Anti-Trust and Competition Laws	24
International Trade Controls (ITC)	26
Anti-Money Laundering	28

Protection of Company Assets and Shareholders

Quality	32
Business Excellence	34
Data Security and Records Management	36
Intellectual Property	38
Conflicts of Interest	40
Branding and Communications	42
Confidential Information and Insider Trading	44

Grünenthal Community

Fair Employment Practices	48
Environment, Health & Safety (EHS)	50
Data Protection	52

Whom to contact	54
---------------------------	----

Message from the CEO



Dear Colleagues,

Based on our company's purpose and our mindsets, our code of conduct ('Code') defines the attitudes that all employees should adopt. It also describes the voluntary measures taken by Grünenthal, as well as those required by law, to ensure ethical and legal business conduct, as well as the personal integrity of all employees. Furthermore, it instructs us on how to do things the right way, and in doing so, helps us to protect our patients, customers, employees, owners and our own reputation.

Our Code is more than a simple guide to ensure we comply with laws and regulations. Rather, it encapsulates our principles and ethics, encouraging us to exhibit attitudes that reflect our purpose and our mindsets – in short our corporate culture.

It is up to all of us to put these words into action. I ask you to fully live our Code and encourage also your colleagues to read, understand and live the Code. Thus you will be equipped with good judgment when it comes to making the right decisions about our business. I invite you to speak up if you believe our Code is not being followed. A concern raised in good faith is exactly what we ask you for.

By adhering to the Code and taking the ethical route, we can best serve patients, achieve the financial performance our shareholders expect, and protect Grünenthal's employees and reputation. As a result, it will make Grünenthal the company it deserves to be, a unique and successful entrepreneurial specialist delivering true benefits to patients.

A handwritten signature in blue ink, appearing to be 'EP' followed by a stylized flourish, enclosed in a simple blue rectangular box.

Eric-Paul Pâques
Chief Executive Officer

Introduction to our Code of Conduct

Our Purpose	2
Our Mindsets.	4
R&D Integrity.	6
Social Engagement	8
– Our Social Responsibilities	
– Our Initiatives in the Field of Pain	
Responsibilities	10
– Employee’s Responsibilities	
– Leader’s Responsibilities	
– Reporting Responsibilities	

Our Purpose:

We are
an entrepreneurial
specialist, delivering
true benefits
to patients.

*"The purpose gives direction
about the contribution each of us
can make, and that leads
to a strong company dedicated
to the patients' needs."*

*Prof. Dr. Eric-Paul Pâques,
Chief Executive Officer, Grünenthal Group*



We need to know the reason why we are working for Grünenthal and how working for Grünenthal can make a difference. The purpose provides the answer. Patients and their needs are at the center of all our thoughts, decisions and actions. Everything we are doing is for the patient.

We want to use our excellent know-how and comprehensive experience to achieve best results for patients. By this, we are able to delivering true benefits to patients, which means addressing unmet patients' needs and offering products with better medical effects and at the same time with lower side effects.

As an entrepreneurial specialist we combine outstanding specialist (scientific) skills and business acumen in a unique way.

Our shared goal is to become a leader and role model among the mid-caps of the pharmaceutical industry. We want to prove ourselves in the market by drawing attention to the two main characteristics: first, our expertise, and second, our outstanding business skills.

Our Mindsets

Four mindsets offer concrete guidance for the everyday Grüenthal. They also define our desired attitudes.

INNOVATIVE
+
CLEVER

- + I seek and implement new solutions
- + I think outside the box
- + I anticipate and drive beneficial change
- + I take smart risks
- + I think and act like an entrepreneur
- + ...

RESULT DRIVEN
+
VALUE ADDING

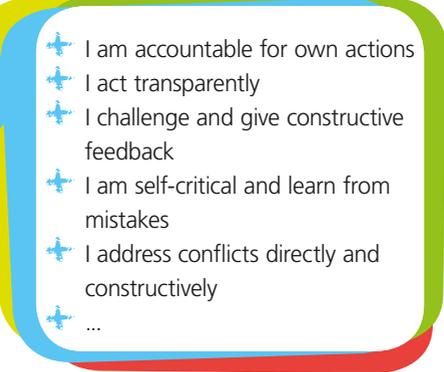
- + I strive to reach ambitious goals
- + I understand and respond to customers needs
- + I prioritise and act efficiently
- + I live continuous improvement
- + I cooperate and work with others to achieve the best for Grüenthal
- + ...

If we are honest and courageous, innovative and clever, result driven and value

behaviors of each individual and for us as one team at



HONEST
+
COURAGEOUS

- 
- + I am accountable for own actions
 - + I act transparently
 - + I challenge and give constructive feedback
 - + I am self-critical and learn from mistakes
 - + I address conflicts directly and constructively
 - + ...



CARING
+
INSPIRING

- 
- + I create an atmosphere of respect, fairness and trust
 - + I actively listen
 - + I develop people
 - + I trust and empower
 - + I give purpose and direction
 - + ...

adding, and caring and inspiring, we will  GRÜNENTHAL

R&D Integrity

Grünenthal is committed to identify, develop and make safe, effective and innovative medicines available that can deliver true benefits to patients and the healthcare system. Following this commitment, we have ethical responsibilities to ensure the quality and integrity of all our research and development (R&D) activities as well as of any interaction with health authorities.

These ethical responsibilities are based on the following principles:

- Honesty in interpretation and communication
- Reliability in performing research
- Objectivity
- Transparency and accessibility
- Duty of care
- Data protection and confidentiality

To ensure that these principles are consistently applied, we have set up clear policies, supported by robust training, mentoring and management methods. All this ensures awareness, implementation and adherence to high standards in our research, development and reporting activities.

This framework allows for early identification and -wherever possible- prevention of transgression. Falsification and deliberate omission of data are all considered serious violations of the ethos of R&D at Grünenthal.



Honesty in interpretation and communication

We consider it the responsibility of all our employees to be honest in presenting the goals, objectives and intent of any R&D activity conducted for and at Grünenthal. The results of all our R&D activities must be presented with appropriate reporting methods, following applicable procedures. In a culture of R&D integrity, honesty and accuracy must also be maintained in conveying, interpreting and communicating data both within Grünenthal and externally to e.g. health authorities, our partners and the public.

Reliability in performing research

All our R&D activities must be designed and carried out carefully and thoroughly in order to avoid negligence, haste, carelessness and inattention as these could potentially lead to the unnecessary exposure of humans, animals, biological materials or the environment. Falsification, deliberate omission of data and failure to meet ethical and legal requirements are considered to be misconduct and not acceptable at Grünenthal as it may harm individuals or the society, especially when it becomes the basis for admission and use of unsafe drugs.

Objectivity

Interpretation and conclusion from our R&D must be founded on unbiased reporting of facts and data capable of proof and secondary review. We require transparency in the collection, analysis and interpretation of data and verifiability of the scientific reasoning. All primary and secondary data are stored in a secure and accessible form, documented and archived as per legal requirements for a substantial period to allow for review and replication.

Transparency and accessibility

As a research-based pharmaceutical company, we recognize the importance of publicly registering the clinical trials we conduct. Thereby we make the information on these clinical trials, including their results, available to the public. We are committed to ensure that trial participants, healthcare professionals and researchers can easily find information on Grünenthal, our research and the clinical trials we sponsor. This information can be accessed via the Grünenthal website and, on freely accessible internet registries, e.g. ClinicalTrials.gov., EudraCT. Results from our R&D activities are also published in independent journals in an open, transparent and accurate manner at the earliest possible time. In addition Grünenthal is committed to enhance data sharing with researchers and to enhance public access to clinical trial information. In line with this commitment, the "Principles for Responsible Clinical Trial Data Sharing" issued

by the European Federation of Pharmaceutical Industries and Associations (EFPIA) and the Pharmaceutical Research and Manufacturers of America (PhRMA) are being implemented.

Duty of care

It is Grünenthal's obligation to ensure that all research subjects and materials, i.e. human, animal or non-living, should be treated with respect and duty of care. Protocols that govern our R&D should not be intentionally violated. Deviations from the desired research design, potentially resulting in misuse of research subjects and materials are not acceptable at Grünenthal. Likewise, the health, safety and welfare of our own employees, the community and the environment in general must not be compromised by our R&D activities.

Data protection and confidentiality

Our employees respect the privacy of the individuals participating in our clinical trials. Subject trial data will be stored in a manner maintaining confidentiality in accordance with applicable regulatory requirements. All precautions are taken to ensure that any documents or data given to Grünenthal or its representatives do not contain information that would affect the anonymity of the subjects who voluntarily participate in our research.

Social Engagement

Our Social Responsibilities

As a worldwide healthcare partner in the treatment of pain, we consider our business activity our most important social responsibility. It can increase peoples' quality of life by maximizing the positive effect of pain relievers, while minimizing side effects.

We do not provide political contributions, but are strongly committed to providing social support to the societies we are operating in. We see ourselves as part of those societies and assume responsibility beyond the scope of our actual business activities. For example, we are committed to palliative medicine; support the hospice movement; donate pain relievers to people in disaster areas; and encourage our employees' social commitment through individual and corporate volunteering.

Responsible social commitment should be a priority for everyone at Grünenthal, so that it will be as effective and credible as possible. As a family-owned company, social commitment has a long tradition at Grünenthal. We are expanding on this tradition through increasing involvement of our corporation and employees in international social engagement.



Our Initiatives in the Field of Pain

THE SOCIETAL IMPACT OF PAIN (SIP) PLATFORM

The "Societal Impact of Pain" (SIP) is an international platform created in 2010 as a joint initiative with the European Pain Federation EFIC® and aims at raising awareness of the relevance of the impact that pain has on our societies, health and economic systems exchanging information and sharing best-practices across all member states of the European Union developing and fostering European-wide policy strategies & activities for an improved pain care in Europe (Pain Policy).

The platform provides opportunities for discussion for health care professionals, pain advocacy groups, politicians, insurances, representatives of health authorities, regulators and budget holders.

The scientific framework of SIP is under the responsibility of the European Pain Federation EFIC®. Grünenthal GmbH is responsible for funding and non-financial support (e.g. logistical support). The scientific aims of the SIP symposia have been endorsed by a large number of international and national pain advocacy groups, scientific organizations and authorities.

www.sip-platform.eu

EFIC-GRÜNENTHAL GRANT (E-G-G)

Since 2004 Grünenthal GmbH cooperates with the European Pain Federation EFIC® to support up-and-coming pain scientists in gaining understanding of chronic pain and providing relief to patients suffering from chronic pain. The focus lies on novel ideas with potential for major advances in the understanding of pain mechanisms and the treatment of patients suffering from chronic pain. Grünenthal donates a total of 200,000 € as biennial grant, individual grants are valued at up to 40,000 € per project for a duration of up to two years. The decision on the winners of the awards is made independently by the Scientific Research Committee of the European Pain Federation EFIC®.

The EFIC-GRÜNENTHAL Grant aims to fund research projects that will become stepping stones toward a better understanding of pain and how to treat patients in the future. With these grants, Grünenthal demonstrates its commitment and ability to go beyond the horizon of short-term commercial interests. Grünenthal as a pain specialist appreciates the fruitful exchange of information and experience with promising junior scientists. It helps to identify treatment gaps and issues as well as potential solutions for new medications.

www.e-g-g.info

CHANGE PAIN®

This initiative aims at understanding the needs of pain patients and develops solutions to improve the management of pain in daily practice. It was founded in 2009 and is officially endorsed by the European Pain Federation EFIC® and a group of international pain experts. Change Pain offers a comprehensive set of services and tools for healthcare professionals as well as patients.

www.change-pain.com

MY PAIN FEELS LIKE...

It is crucial that patients are able to describe their symptoms as detailed as possible to allow early diagnosis and effective treatment – an insight which has motivated us to develop the “My pain feels like...” initiative, aiming at facilitating communication between patients and physicians.

www.mypainfeelslike.com

Responsibilities

Employee's responsibilities

Employee understanding and compliance with Grünenthal's Code of Conduct contributes to the building, maintenance and constant development of Grünenthal's compliance culture. Every employee has a personal responsibility to comply with our Code of Conduct, which will be documented through an annual acknowledgement.

Each and every employee should

- Be committed to doing the right thing within the spirit of our Code of Conduct. A basic understanding of each chapter of the Code is required.
- Be aware of and anticipate the risks related to their roles and responsibilities. This requires a complete understanding of the Code-chapter details relevant to your job.
- Contact their manager or other Grünenthal resources with any questions regarding the Code.

If you identify or suspect a violation, or have concerns regarding the Grünenthal Code of Conduct, please follow the guidance provided in the "Reporting Responsibilities" section on next page.

Non-compliance with our Code of Conduct can create serious risks for Grünenthal, as well as our patients, customers, shareholders and employees. Therefore, failure to comply with the Code may lead to disciplinary action up to and including termination.

Leader's responsibilities

Leaders, just like any Grünenthal employee, must comply with our Code of Conduct. However, as leaders, you have additional responsibilities to lead by example, communicate to and secure from your team members an understanding of our Code of Conduct and drive all your activities with the highest ethical standards. This encourages ethical conduct and ensures your team members can report concerns without any fear of retaliation.

As a leader, you build an infrastructure and environment which prevents, detects and reacts to ethical, compliance and regulatory risks or issues. This is very important as you are accountable for any misconduct by your team members or third parties engaged by you or your team.

Whenever possible, you as a leader, have to take opportunities to communicate and discuss ethical conduct, share challenges with team members and create an open working environment that encourages your team members to come to you with questions and issues. When issues are reported, make sure to respond promptly. If you are unsure how to answer a question or handle an issue, feel free to seek support from other company resources such as your direct manager, HR, or the Legal or Compliance departments. Those resources are available to support employees as well as leaders.

As a leader, you own the culture, create the right environment, build the processes and set the priorities. Therefore, your engagement is vital to fostering Grünenthal's ethical culture and compliant behavior.



Reporting responsibilities

It is every employee's responsibility to promptly report any compliance problem, concern or misconduct. We understand how difficult it can be for any employee, to bring this to our attention. Know that it is important to report anything that might create a problem. By raising an integrity concern, you are doing the right thing: you help us to protect our company, colleagues and stakeholders.

When raising a concern, we do not expect you to have all the facts of the case or an answer to all questions. It is much more **important that you raise your concern in good faith** any time the perception exists that something might be wrong, or not in line with the spirit of our Code.

Our mindsets and culture encourage and enable all employees to report in an open and transparent way. Therefore, we cannot accept anonymous reporting and we ask you to provide your contact information when reporting a concern. Confidentiality is guaranteed: The information you provide will be shared only when needed by those responsible for resolving your concern.

We protect our employees. Grünenthal absolutely prohibits any type of retaliation against any person who reports concerns or helped to report a concern.

How to report?

Reporting a concern or raising compliance questions can be done in several ways.

Internally:

Generally, your manager will be the right person to resolve an integrity concern, but there are alternative channels. If it's more comfortable for you, feel free to reach out directly to the next level of management or to your Compliance or Human Resources contact. You can also contact us via our Compliance email address: compliance@grunenthal.com, or the Compliance Support Line: +49 241 569 4949.

Externally:

There may be times when you might still not be comfortable, still feel unable to use the internal reporting channels because of missing trust in confidentiality management is obliged to keep. Therefore we offer you as well an external **Ombuds Hotline**, providing you maximal confidentiality. You can contact the **Ombuds Hotline** free from any phone in your country, 7 days, 24 hours and report in your own language.

For additional contact information, for reporting, for the Ombuds Hotline free phone numbers or for seeking help or guidance on our Code, please see the back of this Code.

Working with Customers and Suppliers

Patient Safety	14
Patient Interactions	16
Healthcare Interactions	18
Gifts and Business Hospitalities	20
Improper Payments	22
Anti-Trust and Competition Laws.	24
International Trade Controls (ITC).	26
Anti-Money Laundering.	28

▶ Patient Safety

PRINCIPLE/DEFINITION

- The mission of Global Drug Safety is to create trust in Grünenthal by ensuring protection of our patients through identifying, controlling and mitigating safety risks.
- It is of paramount importance to ensure a favorable benefit-to-risk balance for all Grünenthal medicinal products throughout their entire life cycle. Therefore, Grünenthal maintains and continuously develops an effective, global, quality-assured pharmacovigilance (PV) system which ensures patient safety. The PV system is in concordance with applicable legal, regulatory and ethical requirements.
- One key objective is the identification of new or changed safety risks associated with any Grünenthal medicinal product, as well as communication and minimization of these risks. For this purpose, all relevant sources of safety information are taken into account, including individual case safety reports (ICSRs), aggregated data from active surveillance systems, studies, and literature information.

WHAT TO DO

All Grünenthal employees:

- Immediately (within 24 hours) report any safety information on Grünenthal medicinal products of which you become aware (e.g. information discovered during the conduct of your work or which is reported to you directly) to the local Drug Safety department. If you are ever unsure, ask your manager or contact your local Drug Safety department.

Grünenthal employees responsible for the organization of solicited data collection:

- Inform and request input from Global Drug Safety prior to the start of the activities. Ensure that safety information is diligently collected and reported according to Grünenthal standards.

Grünenthal employees responsible for the communication of safety information:

- Ensure that any communication on safety aspects for Grünenthal products is in line with the reference safety information/ standard responses and/or is consolidated with the product-responsible person.



► RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- Be aware of the strict timelines for reporting safety information; report any information without delay within 24 hours!
- Be aware that safety information may not always be obvious. For example, a product complaint may be stimulated by an adverse drug reaction. If there is any suspicion that an adverse drug reaction may play a role, ask about this specifically, and report to Drug Safety as appropriate.

I am a sales representative and was asked by a physician about the occurrence of an adverse event in association with one of our Grünenthal products. This event is not included in the respective Summary of Product Characteristics but I am aware of a publication that is related to this event in question. What do I have to do?

Under no circumstances should you refer to any other document other than the current Summary of Product Characteristics/Reference Safety Information. Information that is provided in this document can be communicated as such. Information outside this document needs to be discussed with a Medical Affairs colleague.

 **Contact:**
drugsafety@grunenthal.com

▶ Patient Interactions

PRINCIPLE/DEFINITION

- As stated in our purpose, patients and their needs remain at the center of everything we do. Delivering true benefits to patients is what we aim for and in this context, every Grünenthal employee and every department is encouraged to seek opportunities to engage in direct dialogue with patients and actively collaborate with them in order to:
 - Raise internal and external awareness about the unmet needs and day-to-day challenges of patients.
 - Make informed decisions and find ways to bring better care to our patients as quickly as possible.
 - Ensure adequate information and access of patients to existing healthcare and drive its further improvement.
- All interactions of Grünenthal with patients and patient organizations must be conducted in an informed and sensitive way, as patient activities supported or organized by pharmaceutical companies are subject to specific strict regulations.
- There are legal, compliance and general ethical aspects to be considered when interacting or collaborating with patients or patient organizations. Disregard for these aspects creates significant risks for Grünenthal (legal, financial and/or reputational).

WHAT TO DO

- Our collaboration with patients and patient organizations must be transparent and must at all times fully comply with the highest ethical standards.
- When planning and executing activities with patients or patient organizations, Grünenthal employees must make an effort to be aware of, and behave in accordance with, all specific laws, codes and regulations that Grünenthal is subject to, and act with respect to internal procedures and standards.
- Collaboration with patients and patient organizations must not be used for the prohibited, indirect/direct promotion of our prescription medicines to the general public.
- When planning activities with patient organizations, those involved must liaise with the responsible Grünenthal interface for the specific patient organization on a corporate, regional or affiliate level to ensure a structured, consistent, compliant and well-informed collaboration of Grünenthal with patient organizations.
- Any financial or non-financial support of patient organizations must be clearly acknowledged by the patient organization and disclosed by Grünenthal. Any arrangements must be in accordance with internal and external regulations.



► RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- When planning and conducting activities with patients, Grünenthal employees must be aware of and sensitive to the physical condition, potential limitations or special needs (e.g. specific travel requirements) of the patients. We bear a special responsibility for the well-being of our patient partners in the context of joint interactions and activities that might exceed that of typical interactions with other stakeholders.
- In order to secure consistent and coordinated internal and external communication in the context of patient activities, the respective departments or teams planning such communication activities are asked to liaise with and align with other potentially affected areas of responsibility (e.g. Corporate/local Communications or regional headquarters).
- Appropriate training is required for those Grünenthal employees who are directly and regularly involved in the planning of activities with patients and/or patient organizations.
- Any third party interacting on behalf of Grünenthal with patients or patient organizations must adhere to and apply the Grünenthal standards of conduct.

I am working in a European affiliate and have received a request from a local patient organization to support a meeting organized by the organization to discuss the social impact of pain. What needs to be taken into account?

You must ensure that any financial and non-financial support of a patient organization is transparent and covered by a written agreement. Being a pharmaceutical company, Grünenthal must disclose these contributions to the public with respect to international and local pharma codes.



Contact:

Compliance@grunenthal.com

▶ Healthcare Interactions

PRINCIPLE/DEFINITION

- Grünenthal's interactions with healthcare professionals (HCPs) and healthcare organizations (HCOs) must enhance patient care and ensure the effective use of our products.
- Interactions with healthcare professionals and healthcare organizations may be for promotional, scientific, medical, educational or any other non-promotional reasons. This includes, but is not limited to, commissioning healthcare professionals to speak on behalf of Grünenthal, participate in meetings or consultancies.
- National laws and regulations, industry codes, internal procedures and high standards of integrity and honesty must be followed in all healthcare interactions to ensure that they are conducted in a transparent and compliant way.

WHAT TO DO

- Each Grünenthal employee is expected to be aware of, and behave in accordance with all applicable laws and industry codes adopted by Grünenthal when dealing with external partners in the healthcare environment.
- As a Grünenthal employee involved in any healthcare interaction, you must follow and apply the standard healthcare interactions processes as described in Grünenthal's procedural documents and the localized Grünenthal Healthcare Interactions Manual. Any interaction must be properly recorded (e.g. in @dVance where available). If further guidance is needed, please reach out to your Compliance contact.
- Transparency requirements for healthcare interactions must be followed (e.g. disclosure of payments to healthcare professionals, if applicable) and external partners should be encouraged to allow for individual disclosure of transfer of values where needed.
- Information provided by Grünenthal, whether for promotional or non-promotional purposes, must not mislead in any way. All promotional material (print and digital) must be reviewed and approved according to local applicable ethical, medical, scientific and legal standards before use.



- Communications and publications concerning our products must be medically and scientifically accurate, as well as ethically and legally compliant.

► RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- To ensure compliance with local requirements, close collaboration is required between Grünenthal headquarters and local Grünenthal affiliates for any cross-country healthcare interaction.
- The principles of “transparency”, “separation”, “equivalence” and “documentation” must be followed when interacting with healthcare professionals or healthcare organizations. These principles imply that any remuneration provided to a healthcare professional or healthcare organization must be reasonable, reflect the fair market value of the work performed, and are provided in accordance with a written agreement.
- Any third party interacting with healthcare professionals or healthcare organizations on behalf of Grünenthal must adhere to and apply our standards.



Contact:

Compliance@grunenthal.com



I am a product manager in Colombia and plan to invite healthcare professionals to an international pain congress. What needs to be considered from a compliance point of view?

Healthcare professionals may only be invited to international meetings organised by Grünenthal if there is an appropriate and relevant scientific programme, and the organization of the event is in compliance with all applicable regulations: i.e. the regulations of the country in which the activity takes place, and the regulations of the country in which the healthcare professional is located. Only appropriate venues, travel and hospitality can be provided, as described in the localized Healthcare Interactions Manuals.

Gifts and Business Hospitalitys

PRINCIPLE/DEFINITION

- In some countries, a business relationship may involve occasional business-related entertainment or the exchange of gifts of nominal value among business partners. The acceptance or provision of such gifts, entertainment or any advantage by an employee, is permitted only if it is in accordance with applicable laws and in line with Grünenthal's Code.
- In general, gifts and entertainment may be accepted or provided only if of nominal value, unsolicited, occasional but never in cash or cash equivalent.
- The exchange of gifts and business hospitalitys is never appropriate if it creates an obligation between the parties or if it is intended to create improper influence on business decisions.
- In addition, while interacting with our healthcare-related customers, Grünenthal employees have to strictly comply with the applicable pharmaceutical industry codes.

WHAT TO DO

- Never accept anything of value, including gifts or business courtesies, if it would constitute either an inducement to make, or a reward for making, any decision favorable to the interest of a third party or to your own personal interest. If you are unsure what is acceptable, please discuss with your manager or contact your Compliance department for advice.



► RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- Do not accept anything of value, including gifts or business courtesies, that may compromise our independence or that may lead to difficulties in making objective decisions regarding a third party.
- Provisions around gifts and entertainment may differ according to the type of third party you are interacting with. For example, guidelines are generally much stricter when dealing with healthcare providers (HCPs) and public officials or government employees compared to other customers and suppliers.

Whom should I ask if in doubt about the appropriateness of a gift or entertainment?

If in doubt about the appropriateness of a gift or entertainment, you should inform your manager and consult your local Compliance contact or the Compliance department.

If during Christmas season, I receive in my private home a valuable gift from a supplier who is also a social friend, should I return it, even though the gift was not delivered to my office but directly to my home address?

Place of delivery of a valuable gift does not make a difference, so the gift could not have been accepted or must be returned. Remember that any gift or entertainment received by an employee must not influence a business decision, nor even give the appearance that it might influence business decisions.



Contact:
Compliance@grunenthal.com

▶ Improper Payments

PRINCIPLE/DEFINITION	WHAT TO DO
<ul style="list-style-type: none"> ○ Improper payments or any other form of corrupt business behavior by any of our employees, or by any of our business partners, to any private or public person or institution could expose the employee or the third party to civil and criminal prosecution and may harm Grünenthal. ○ It is considered improper to give money or anything else of value either as an inducement to make, or as a reward for making, any decision favorable to the interest of Grünenthal. ○ An improper payment can include illegal rebates, bribes, kickbacks, grants, donations or any comparable action with the purpose of gaining a competitive advantage or to obtain or retain business. ○ Improper payments should not be confused with reasonable and acceptable customer travel, meals, gifts, etc. which are within the limits of local and international regulations, pharmaceutical codes and/or within the limits of Grünenthal guidelines. 	<ul style="list-style-type: none"> ○ Never offer or give any form of advantage with the intention to improperly influence your business partners or the government; and never allow any of our third parties to act in this manner. ○ Be familiar with existing laws, codes or company expense limitations before giving any gifts, or offering any business courtesies or customer entertainment. ○ Maintain complete transparency by recording correctly and completely any type of spending by ensuring timely and accurate books and records that are sufficiently detailed and documented. Ask your Accounting or Finance department for guidance if needed. ○ Never offer a business courtesy under circumstances that might create the appearance of being inappropriate. ○ Always carefully check whether the granting of an advantage complies with Grünenthal's standards and existing regulations. If in doubt, contact your manager, or your Legal or Compliance contact.



- Misleading accountings or altered records are strictly prohibited. Every gift, payment or any other type of contribution, whether made in cash or not, shall be authorized, documented, reviewed and fully accounted for.

► RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- If working via third parties, make sure to perform a risk based due diligence and to understand their business behavior. Watch out for any indications of improper practices, conflicting interests, family or other relationships which could improperly influence a customer's decision, etc.
- Be alert to
 - Any requests to make a payment in a country or to a person not directly related to the transaction.
 - Any request for payments or compensations outside the spirit of the existing pharmaceutical Codes of Conduct.
 - Any disproportionate payment related to the services provided.
 - Any payment without a clear and appropriate service provided.



Contact:
Compliance@grunenthal.com



I heard that mainly US companies have the need to avoid improper payments under the FCPA (Foreign Corrupt Practices Act)

US authorities started to focus on this in the 1970s, but shortly after, similar improper payment laws were created in almost every country in the world. Violations of these countries' laws can result in criminal and/or civil actions with penalties to companies and penalties and/or imprisonment of involved individuals.

I'm working with a distributor who is charging us on a monthly basis for marketing expenses incurred by the distributor's sales representatives. Is that OK?

It might be acceptable to reimburse certain expenses made by the distributor or another third party but we need to be very careful on this and make sure that those expenses are acceptable, transparent and within the limits of applicable laws and regulations. Any expenses which we cannot justify or clarify in detail might be perceived as an improper payment with co-responsibility of Grünenthal if related to our products or business activities.

Anti-Trust and Competition Laws

PRINCIPLE/DEFINITION

- Grünenthal firmly believes that customers and the society as a whole benefit from free fair and open markets and that is why we seek to be successful through the quality of our products and their competitiveness in the market. Therefore, we require all employees to comply with every applicable law and regulation regarding fair competition and anti-trust, and not to disturb, limit or hinder competition.
- Anti-trust and competition laws prohibit agreements and/or discussions between competitors that restrain trade, or reduce or undermine competition such as by fixing or controlling prices, allocating customers or geographic territories, limiting output levels or the sale of products or boycotting certain suppliers or customers.
- and fines, and may invalidate respective agreements.
- If you are not sure whether an intended action may raise anti-trust issues or if an answer to a specific anti-trust topic is not clear to you, you must obtain advice from the Global Legal department before you act.
- If you are a member of a trade association, or when you participate in industry gatherings, pay special attention to these rules, as these meetings involve interaction with competitors. There is no "association privilege". Make sure to have only acceptable topics on the agenda, a neutral witness registering the subjects discussed and to obtain and check the meeting minutes circulated afterwards. In case that a competitor discloses competitive information or in case the discussions lead in the direction of potential misconducts mentioned above, you should immediately object to such points, interrupt the discussions and, in case of continued discussions, leave the meeting after having recorded your objection.

WHAT TO DO

- Many countries have anti-trust or competition laws, and as an employee you have to ensure that your conduct and Grünenthal's conduct is consistent with all applicable laws in the countries where Grünenthal operates. These laws can be complex and may differ from one country to another. Violation of any anti-trust or competition law is subject to sanctions



► RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- Do not agree or even discuss with competitors, prices, bids, terms or conditions of sale, sale territories, customer allocation or product lines.
- Do not discuss with competitors research and development plans, production capacity, sales capacity or volume, cost, investments, profits and/or profit margins.
- Do not discuss with competitors market shares, product offerings and third party classification or distribution methods.
- Only gather information about competitors in an appropriate and lawful manner.
- Do not use informal or personal contacts with competitors to discuss or agree to any of the above. In personal relationships, competition rules must be strictly complied with at all times.
- Check the agenda of trade association or industry meetings in advance for possible problems and make sure that only acceptable topics are on the agenda.
- Seek advice of the Global Legal department if you are unsure whether any intended action could raise an anti-trust or competition concern.

We are looking for co-promotional and/or co-marketing possibilities within my country. How can I do this in the right way while adhering to applicable competition and anti-trust laws?

For successful co-promotion or co-marketing of our products in your country, you probably will want to interact with potential pharmaceutical competitors in your local market. As the applicable laws are very complex, and have a global reach, it is essential that you involve your Global Legal department as early as possible in the process of developing new commercial activities given the many uncertainties that arise in the application of these laws.



Contact:
GlobalLegal@grunenthal.com

International Trade Controls (ITC)

PRINCIPLE/DEFINITION

- Various national and international trade laws restrict or prohibit the import, export or domestic trade of goods, technologies or services, or deal with specific products, capital and payment transactions (embargoes). These restrictions and prohibitions may depend on the nature of the goods, the country of origin or end-use, or on the identity of the customer.
- All employees must comply with control regulations when buying, selling, producing or marketing goods or when transferring or acquiring technology. Necessary permits from the relevant authorities, as well as end-use declarations that are legally prescribed or voluntarily required by Grünenthal, must be obtained prior to dispatch, import or export.
- Failure to comply with international trade laws can subject Grünenthal or the relevant employee to civil and criminal penalties, including suspension or denial of trade privileges.

WHAT TO DO

- Follow the “Know Your Customer/Know Your Supplier” principle: All Grünenthal employees conducting business with third parties are responsible for understanding who our business partners are, how our products or business information will be used, and where the final destination of our products is. To ensure a good understanding of these aspects, adequate screening of your business partners is essential as defined in internal due diligence procedures.
- Take personal responsibility seriously: All employees responsible for Grünenthal’s international operations must be aware of relevant ITC laws. Consequences arising from violations of trade control laws have severe consequences and can lead to significant fines and penalties for both Grünenthal and the individuals involved.
- If in doubt whether ITC requirements have been met, contact the Compliance department.



► RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- Watch out for red flags! When entering into a business relationship, always remember to apply the “Know Your Customer/Know Your Supplier” principle. If your business partner seems reluctant to provide you with any information requested from our side, consider why he might react like this.
- Before entering into a business relationship request a check against the pertinent list of prohibited recipients! It is strictly illegal to conduct business with any third party suspected of being involved in the development of biological, chemical or nuclear weapons or subject to boycott or trade restrictions. A boycott or restricted persons list check can help you to discover if the third party you are dealing with is potentially subject to trade restrictions.

If I want to apply the “Know Your Customer/Know Your Supplier” principle to a new business partner, what kind of information should I request from him?

At Grüenthal, we are committed to complying with International Trade Controls. A boycott or restricted persons list check must be carried out before signing any contract or order with any business partner, all SAP users have the rights to perform that check. Furthermore, those potential business partners considered as “High Risk” must be screened following Grüenthal’s due diligence process, so that potential red flags can be identified early. For any questions concerning the screening process, contact your manager or ask advice from your Compliance department.



Contact:

Compliance@grunenthal.com

Anti-Money Laundering

PRINCIPLE/DEFINITION

- Money laundering refers to the process of concealing the source of illegally obtained or ethically-suspect monies in order to make those monies appear legitimate. In most countries, it is a criminal act to launder money. Anti-money laundering is the term used to describe the controls to prevent, detect and report money laundering activities.
- At Grünenthal we are fully committed to complying with all anti-money laundering laws. Grünenthal will conduct business only with customers and business partners involved in legitimate business activities and with funds from legitimate sources.
- Failing to detect customer relationships and transactions that place Grünenthal at risk might lead to legal problems and can severely damage Grünenthal's integrity and reputation.

WHAT TO DO

- "Know Your Customer" means understanding who your customer is, their way of working and the kind of transactions in which the customer is likely to engage. By knowing your customers you will be able to ensure that they are engaged in legitimate business and that their funds are from a legitimate source. Any unusual behavior should be reported to your manager, or the Finance or Compliance departments as it might be an indication of potential money laundering.
- If interacting with third parties:
 - Ensure compliance with applicable anti-money laundering laws and regulations.
 - Make sure to follow Grünenthal's third party due diligence process which prevent and detect unacceptable and suspicious forms of payment.



► RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- Pay attention to customers or business partners that are reluctant to give full disclosure or who provide insufficient or false information in support of our policy of “Know your Customer”.
- Do not accept any cash payments from customers. Instead, always insist on normal wire transfer from the customer’s bank account to Grünenthal’s bank account.
- Pay attention to requests to transfer money to a third party not involved in the transaction or to an unknown or unrecognized account.
- Carefully evaluate orders, purchases or payments that are unusual or inconsistent with the customer’s or proposed business partner’s business.
- Avoid any transaction involving locations that are identified as secrecy havens or are known for money laundering. Also, be on alert for requests for fund transfers to or from countries that are not logically related to, or have no connection to the transaction.

What should I do if I identify a suspicious money transfer or if I have doubts about the business behavior of a customer or business partner?

Any doubts or any impressions you might have about strange requests or business behavior of a customer or business partner should be escalated immediately to your manager and the Compliance department. In case of suspicious money transfers or transactions, the Finance department needs to be informed so that they can take corrective actions as soon as detected.



Contact:

Compliance@grunenthal.com

Protection of Company Assets and Shareholders

Quality	32
Business Excellence	34
Data Security and Records Management	36
Intellectual Property	38
Conflicts of Interest	40
Branding and Communications	42
Confidential Information and Insider Trading	44

Quality

PRINCIPLE/DEFINITION

- Quality is a cornerstone of our success, both in the present and for the future. The high quality of our processes, services and products ensures patient safety, corporate competitive advantage and business sustainability.
- Patients, healthcare professionals, the public, regulators and business partners rely on our commitment to meet the demanding regulations and standards for the pharmaceutical industry. We expect our business partners to also adhere to these regulations and standards.
- We, the employees of Grünenthal worldwide, commit ourselves to complying with regulatory requirements, ethical standards, internationally accepted good practices and our internal procedures to achieve the highest quality in everything we do.
- We continuously identify opportunities to further improve our performance. With our attitude of excellence we ensure efficient processes and global standards.

WHAT TO DO

- Know your job! Familiarize yourself with applicable regulations, standards, internationally accepted good practices and our internal procedures.
- Follow our procedures! If you are in doubt regarding the interpretation of any procedure, ask your manager for clarification.
- Report issues! If you notice or perceive any process, product or service that does not meet regulations and standards, immediately inform your manager, who will take the necessary actions, in collaboration with appropriate experts.
- Fix it! Respond to indicators of potential issues by taking timely and appropriate corrective measures.



▶ RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- Be part of the process! Continuously meet the regulations and required standards.
- Focus on customer needs! Understand feedback and complaints as great opportunities for continuous process-, service- and product-improvements.
- Take ownership! Consider the highest quality in everything you do to ensure sustainable business success.

I work on a packaging line. What should I do if I notice that some finished product units coming off the line do not meet expected quality standards?

Our brand stands for high quality products. If you notice products that do not meet the required standards, inform your manager immediately. He or she will take the appropriate steps, together with experts from our Quality Assurance department.

I am a Clinical Research Associate visiting a clinical trial investigator site and I realize patient information data might have been transcribed by the study nurse instead of being created by the investigator during the patient visit. What steps should I follow?

Integrity and correctness of patient data records are the foundation of reliable clinical trials. If you notice suspicious data entries that do not meet required standards, inform the Principal Investigator and your manager immediately and document the event in your monitoring report. Your manager will initiate the necessary corrective and preventive actions.

I am working in administration and notice that we routinely do not follow a Standard Operating Procedure (SOP), since the real process looks completely different. What should I do?

Internal procedures, like SOPs, are in place to ensure consistency of our processes. If you recognize that any procedure is not being followed, contact your manager immediately to get either the procedure or the practice corrected.



Contact:

QualityAssurance@grunenthal.com

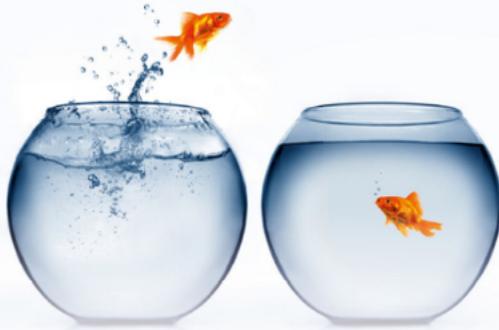
Business Excellence

PRINCIPLE/DEFINITION

- Grünenthal is subject to national, regional and international legislation and regulations designed to protect our patients and customers. We proactively implement and follow all laws and regulatory requirements governing the development, manufacturing, distribution, marketing, promotion and sales of our products.
- We understand Business Excellence as the continuous improvement of systems, organizations, processes and interfaces throughout the entire global organization to ensure at all times quality, efficiency, effectiveness and, consequently, competitiveness of Grünenthal's operations.
- Maximum simplification, standardization and the employment of best/leading practices are key prerequisites to achieve business excellence and minimum total costs of ownership (TCO) of the systems, processes and solutions operated by Grünenthal.
- In order to improve the quality of services and products, and in order to reduce operations costs, appropriate performance metrics as well as lean enterprise methodologies shall be applied to all key processes and activities.
- Grünenthal's operations must be continuously monitored and controlled with regard to potential risks which might lead to deviations from business objectives or even to disruption of business continuity. Therefore, a global risk management system must be maintained and supported on a regular and, in case of unforeseen events, on an ad-hoc basis.
- Integrated Business Planning (IBP) is the monthly process on how we actively steer our commercial activities towards better predictable business in an efficient way to achieve our plan. Aiming for having every month ONE aligned realistic bottom up plan on how much we think we will sell month by month for the next 24 months. IBP will help us to identify gaps and upsides between the bottom-up sales plan, strategic goals and current business performance to define gap closing activities. And it will help us to balance demand and supply to better achieve corporate objectives. The overall scope of IBP is an increased efficiency, transparency and predictability of our business.

WHAT TO DO

- Ensure through cultural development, continuous training and open communication that all employees are familiar with applicable laws, regulations, policies and industry standards.
- Make sure that Grünenthal's global standards are followed and that the processes and systems are implemented and executed in the most standardized and simple way - and without increase of complexity.



- Define, monitor and continuously review key performance indicators for all major processes.
- Implement a culture of continuous process improvement and strive for perfect processes and systems.
- Ensure that your area of work and responsibility is covered and controlled by Grünenthal's Global Risk Management System. Discuss any potential risks with the risk manager of your SBU/function, or directly with the Global Risk Management department.

► RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- Anticipate the impact of your decision on business processes and work load; also, implement and optimize a single process with respect to its total cost of ownership rather than to the costs of the single solution you are going to employ.
- If you need to set up a new process, determine whether a corresponding solution or system is already in use by other departments/functions.
- Workflows and activities should always be set up in a process, rather than in a department/function-oriented way. Roles and responsibilities of involved parties, as well as interfaces along the process, need to be clearly defined and communicated.

I'm a member of a local Pharmaceutical Association and became aware of an upcoming change in the regulations which will lead to the need to disclose certain data to the local authorities which was not required before. What should I do?

It's an excellent initiative to join local or international trade associations, as it can help you to identify early any changes in regulations. It's also important to share upcoming requirements with your manager, related department heads and colleagues internationally so that process modification can be built pro-actively and implemented as needed.



Contact:

Compliance@grunenthal.com

Data Security and Records Management

PRINCIPLE/DEFINITION

- Data Security starts with general security but the most important part is related to IT Security when handling digital information.
- Grünenthal's Records Management methodology defines the creation, classification, maintenance, storage and disposal of a business record and all the data contains in it. The most important task within this methodology is the way how business records have to be treated with regard to their level of confidentiality, integrity, availability and data privacy.
- As a research-driven company, Grünenthal operates with critical data and business records that have a high value for the success of the company.
- Be aware that Grünenthal's company data is an attractive target for competitors, hackers and thieves. Data Security is not only a technical or organizational task, but also a cultural value for all of Grünenthal's employees and business partners.
- All employees are accountable for the correct and secure use of the company's IT systems, especially those used for information exchange and data storage.

WHAT TO DO

- At Grünenthal we implement measures that are state of the art to protect Grünenthal's data from manipulation, loss, damage and theft. Ensure that you are familiar with these measures and act accordingly.
- Follow Grünenthal's Records Management methodology:
 - Classify your business records in terms of their level of confidentiality, integrity, availability and data privacy.
 - Apply appropriate security measures according to the business records' criticality level.
 - Manage the lifecycle of your business records accordingly to the law and company standards.
- Comply with Grünenthal's internal guidelines on the acceptable use of IT systems:
 - Define strong passwords and PINs and do not share them.
 - Use your IT equipment carefully; log it when leaving your workplace and do not leave it unattended or unsecured.
 - Only use encrypted and approved portable storage devices (e.g. USB sticks).
 - Do not use unauthorized devices, such as personal home computers, or public cloud services to store Grünenthal data.
 - Use e-mail only for business purpose and be aware of phishing and fake mails; use email encryption when sending confidential data.



- Use the internet precisely and carefully; do not harm the interests or the public reputation of Grünenthal.
- When sharing Grünenthal data internally or with third parties, mark the confidentiality level, and only use technologies for electronic data transfer that have been approved by Grünenthal's IT department.

► RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- Be familiar with the content of all IT user handbooks and guidelines provided by Grünenthal's IT. They describe how to operate Grünenthal's IT systems correctly. You can find these documents on Grünenthal's Intranet.
- Encrypt confidential data before transferring it over public networks, like the Internet.
- If further guidance is needed, please contact Global IT or your Compliance contact.

How can I check if email encryption is implemented between Grünenthal and an external partner?

You have to write an email to the external email address and type #info in the subject field. A few seconds later our email gateway will send you a response email which will notify you if, and which kind of, email encryption is implemented.

More details on secure data exchange methods can be found on Grünenthal's Intranet. Use the topic "encryption" in the search menu.



Contact:

InformationSecurity@grunenthal.com

▶ Intellectual Property

PRINCIPLE/DEFINITION

- Grünenthal's intellectual property is one of its most valuable assets as it is essential to maintaining the company's competitive advantage. It includes inventions, know-how, patents, trademarks, industrial design rights, regulatory data, copyrights, trade secrets, domain names, scientific and technical knowledge and any other potential intellectual or industrial property right.
- All Grünenthal employees are expected to support and safeguard the establishment, protection, maintenance, defense and enforcement of Grünenthal's intellectual property rights.
- At Grünenthal, we are committed to respect the intellectual property rights of third parties. Unauthorized use of third party intellectual property may expose the company and the employee to lawsuits, fines, damages and even criminal penalties.
- At Grünenthal we vigorously defend Grünenthal's intellectual property, as violations of intellectual property rights not only harm Grünenthal's assets but, in many cases, also threaten the health and safety of patients.

WHAT TO DO

- Identify and vigorously protect, maintain, defend and enforce Grünenthal's intellectual property rights.
- Respect valid patents, copyrighted materials and other protected intellectual property of third parties.
- Promptly report any potential issue with or actions against Grünenthal's intellectual property, so that appropriate legal actions can be taken.
- Involve Global Legal department or Global Patents & Trademarks department in any contractual matter that relates to a material right, obligation or liability, or with any issues related "fair use" of intellectual property rights.



► RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- Always protect Grünenthal's intellectual property. Intellectual property rights include the right to stop others from using Grünenthal's intellectual property without permission.
- Never disclose Grünenthal proprietary information to customers or suppliers without taking appropriate measures for non-disclosure and confidentiality.
- Avoid any activities that could involve or lead to involvement in any unlawful practice or harm to Grünenthal's intellectual property.
- Information about a new idea, project or product must not be introduced or provided to third parties without appropriate measures being taken, such as filing a patent application and/or signing respective confidentiality or non-disclosure agreements.
- Before using any third party to develop new products or software, a written agreement is required to cover confidentiality, intellectual property ownership and other rights to the information exchanged, and results developed during the collaboration.



Contact:

GlobalLegal@grunenthal.com

Conflicts of Interest

PRINCIPLE/DEFINITION

- A conflict of interest exists when your private interests, including personal, social and financial, interfere in any way with the performance of your responsibilities to Grünenthal, or with your capacity to act in the best interests of Grünenthal.
- Even the appearance of a conflict of interest may damage Grünenthal's as well as your own reputation.
- You therefore must separate your own personal interest from those of Grünenthal and avoid any situations which can create even the appearance of a potential conflict of interest.
- Potential conflicts of interest may exist
 - Whenever you manage directly any business with partners who are your relatives or close friends; or with companies you or your relatives have a direct interest in;
 - Whenever a personal gain may influence or appear to influence your correct judgment and objective decision making for Grünenthal.

WHAT TO DO

- Disclose any potential conflict of interest in writing to your manager and your Human Resources contact so that an evaluation of potential risks can be made and necessary protection and guidance can be obtained. Your local organization may require you to fill out a specific conflict of interest form in order to make this disclosure.
- If you have doubts whether it is appropriate to accept entertainment or a gift, promptly disclose the situation to your manager and your Compliance contact.
- Ensure that any business relationship is at arms' length.
- Do not misuse Grünenthal resources, assets, time or facilities for personal gain.



► RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- Acceptance of gifts and entertainment from business partners, e.g. suppliers and/ or customers, are only allowed if they are occasional and of nominal value.
- Get approval from your manager and your Human Resources contact before taking any professional opportunities outside Grünenthal.
- Use caution when directing business to suppliers who are owned or managed by relatives or close friends.

Thanks to my position in the company I have easy access to Grünenthal suppliers. I have even become close friends with some of them. One supplier even offered me personal services at an unbelievable discount, including free delivery to my home. Can I accept these kinds of services?

This situation might create a clear conflict of interest if this supplier is offering services at a value that you would never be able to get if it wasn't due to your professional relationship with that supplier as part of your professional activities at Grünenthal. You should not accept the offer, and immediately disclose the situation to your manager and your Human Resources contact. The evaluation and documentation of this disclosure will help to protect you and Grünenthal in case of any accusation.

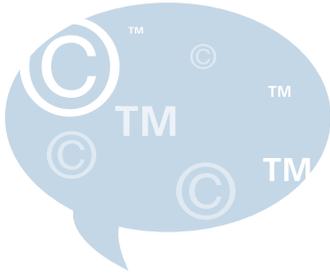
Branding and Communications

PRINCIPLE/DEFINITION

- Brands are the cornerstone of recognition and image in the marketplace. A strong brand connects to the hearts and minds of its stakeholders, creating personal references to its values and emotional assets, thus constituting a unique and iconic profile. Our Brand Identity summarizes the core aspects of the brand, describing the essential facets of Grünenthal's personality.
- Any corporate positioning of Grünenthal is in the responsibility of the Corporate Communications department. Medical/scientific statements are in the responsibility of the Medical Affairs department.
- All corporate media relations and inquiries are handled at corporate level by the Corporate Communications department. At local level, only authorized and designated employees are entitled to talk to the press on local matters and depending on the topic only in alignment with the Corporate Communications team in Headquarters.
- If engaging in communications that are related to our company keep the following guidelines in mind:
 - Our corporate design is unalterable. Our logo must not be changed, adapted nor used for other purposes than positioning our company. This also applies to any internal use.
 - Whenever you create a brochure, presentation or any other communications tool, use our Corporate Design, the manual for which is available on the Intranet.
 - Preserve business secrets, and only communicate publicly accessible data.
 - Rely on official company statements which are aligned with the Communication department
- Always use the actual corporate presentation that can be found on the Intranet.
 - Be aware that we have specialized departments and spokespersons within our company who speak on behalf of the company. Media inquiries are only answered by the official spokespersons in Corporate Communications
 - Align with the communication experts in the company before starting a communication on behalf of the company and be aware of approval processes.

WHAT TO DO

- All communications must create and support a unique, strong Grünenthal brand to build or protect the company's reputation.



- If you would like to conduct online activities on the name of company, contact Global/ Local Communication department to get their review and approval.
- Provide Corporate Communications with information about new external digital communication channels to be added in the Grünenthal digital inventory.
- If you want to register domains for online communication activities on behalf of Grünenthal please follow the instructions of the domain guideline and get in contact with Global Trademarks.

▶ RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- If you communicate with outside parties, make sure that your statements do not violate any local or international law, regulation or pharmaceutical code.
- To make sure that Grünenthal is presented uniformly to the outside world and that we “speak the same language” seek guidance on all communications. Reach out to the:
 - Corporate Communications department before starting any corporate positioning of Grünenthal, before creating any corporate

design-related material and before conducting any online activity (e.g. websites, apps or social media activities) on behalf of Grünenthal;
- Medical Affairs department before starting any Grünenthal product-related, medical or scientific communication.

- Be aware that to an external person, private statements can be attributed to you in your capacity as a representative of Grünenthal (e.g. at conferences, on the Intranet, etc.). Therefore, ensure people understand when you are expressing a personal opinion.
- Always be aware that you are representing Grünenthal. You will ultimately be responsible for what you publish, including on social media platforms like Facebook, Xing, LinkedIn, etc.
- Do not start social media activities without consulting Corporate Communication



Contact:

Info@grunenthal.com

Confidential Information and Insider Trading

PRINCIPLE/DEFINITION

- Confidential information is all information that is not publicly available. It's a valuable company asset and any unauthorized disclosure could cause damage to the interest of Grünenthal or our third parties. Much like keeping Grünenthal's non-public information confidential, we respect and protect received confidential information of third parties in the same way.
- Insider trading generally refers to buying, selling or exercising securities (e.g. stocks or shares) after receiving non-public information about that security. It's illegal to use any non-public information about Grünenthal or other companies to influence your, or anyone else's, decision to purchase or sell securities.

WHAT TO DO

- Identify which information is confidential or not, and handle confidential information properly.
- Protect confidential information from improper disclosure by only allowing access to it to individuals who have a need to know.
- Respect the contractual confidentiality obligations that apply for you and for Grünenthal.
- Obtain a signed confidentiality or non-disclosure agreement with any third party before entering in conversations with third parties that may include confidential information.
- Only act on confidential information of third parties if it has been obtained by lawful means or from publicly accessible sources.
- Notify your manager, Legal department or Compliance department if you identify a misuse or misappropriation of confidential information.



CONFIDENTIAL



► RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- Never discuss or divulge confidential information in public places (e.g. planes, trains or restaurants)
- Ensure that confidentiality or non-disclosure agreements are in place with third parties with whom confidential information is shared.
- Never use non-public information to buy and sell securities, nor recommend that others buy or sell securities.
- Seek guidance from your Legal department and/or Compliance department if the necessary measures of protection are unclear, or in case a potential risk has been identified.

I just hired an employee coming from a competitor. May I ask this new employee about confidential information of his previous employer?

No, you can only share information which is available to the general public. Even if this employee would voluntarily share confidential information make sure to refuse any discussion which might cover confidential information.



Contact:

Compliance@grunenthal.com

Grünenthal Community

Fair Employment Practices	48
Environment, Health & Safety (EHS)	50
Data Protection	52

Fair Employment Practices

PRINCIPLE/DEFINITION

- At Grünenthal we guarantee equal employment opportunities and favor the professional growth of each individual.
- All employment decisions are made without regard to personal characteristics such as race, ethnicity, religion, gender, sexual orientation, age, national origin, disability or any other relevant category.
- At Grünenthal we promote and live a culture of respect, and value diversity. We do not tolerate any form of discrimination, retaliation or harassment.
- Management is committed to providing a safe and healthy work environment, which fosters mutual respect, loyalty and trust. We believe these are indispensable elements to be a successful organization.
- At Grünenthal we do not tolerate threats or acts of violence, nor any unprofessional or discriminating behavior.
- Grünenthal respects the right of all employees to join any legally recognized employees' association and will comply with any law relating to employee representation.

WHAT TO DO

- Each Grünenthal employee is expected to behave in line with these principles and to:
 - Avoid any form of discrimination, harassment, intimidation or bullying;
 - Treat colleagues and business partners fairly, courteously and respectfully;
 - Contribute to establishing a culture of diversity, mutual trust, loyalty and respect;
 - Report any workplace harassment or discrimination you are aware of to your manager or your HR contact.



► RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- Understand and learn how to manage cultural diversity in order to avoid misunderstandings or conflicts with your colleagues or business partners.
- Third parties performing activities on behalf of Grünenthal are also required to follow these principles and comply with all applicable employment laws and regulations.

Environment, Health & Safety (EHS)

PRINCIPLE/DEFINITION

- Grünenthal is committed to conducting business in compliance with all applicable environmental regulations, health and safety laws and any other pertinent regulations and company policies.
- Grünenthal employees are provided with a safe, healthy and clean working environment and they are constantly encouraged to identify areas for improvements towards a safer, healthier and better working environment.
- At Grünenthal we recognize the value and importance of sustainable development. We promote an efficient and responsible use of resources and avoid the generation of any unnecessary waste.

WHAT TO DO

- Each Grünenthal employee is responsible for maintaining a safe and healthy workplace and to comply with all applicable laws, regulations and company policies.
- Grünenthal employees are expected to integrate considerations regarding environment, health and safety into all their business processes and activities.
- All environment, health and safety non-compliant activities or concerns should be timely reported by employees to their manager and to the local or global EHS representative.



► RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- Be aware! Make sure you are familiar with EHS compliance requirements and - in case of doubts - ask for support from the EHS team.
- Be careful! Act with extreme care, always follow safety instructions and consider and control EHS risks connected to your activities before acting.
- Speak up! Report all EHS concerns you might have and share your thoughts with the EHS team if you believe there are areas where improvements are needed.

Data Protection

PRINCIPLE/DEFINITION

- Grünenthal is committed to handling any personal data responsibly and in compliance with applicable laws by protecting it during the course of our business activities and by ensuring high standards of data protection in all Grünenthal operations worldwide.
- Grünenthal, as a company, is responsible for ensuring the correct handling of personal data by Grünenthal and by any third party engaged to act on Grünenthal's behalf.
- It is our duty to handle personal and sensitive personal data with due care, not only because it is a legal requirement, but even more importantly as a demonstration of our respect for employees, current and former business partners and product users - especially patients. In this respect we are dedicated to restricting access to this information and using it only on a need-to-know basis, as well as destroying it properly as soon as we no longer need to retain the data.

WHAT TO DO

- Only collect personal data when you have obtained a valid and detailed consent from the owner of the data (=Data Subject).
- Use personal data only for the purpose for which the data was provided, and never for any personal benefit. This purpose has to be clear and acceptable. Whenever possible, try to use anonymous or aggregated data to avoid identification of any individual.
- Minimize your data collection, make sure not to ask anything which is not necessary to cover the specific purpose of the collection.
- Ensure that access is limited only to those individuals who need to know and that unauthorized access by anybody else is prevented.
- Share personal data only with business partners if and insofar as this is necessary for the business relationship and only after ensuring that the business partner complies with applicable data protection regulations. With those partners, always include a data protection clause in the contract.
- Upon a person's request, Grünenthal must be able to disclose any personal information Grünenthal has about him or her and how it is being used.



- Feel free to ask! If you are not sure about the use or distribution of personal data, seek advice from the Grünenthal Data Protection Officer or the Compliance department before collecting, accessing, using or distributing such information.

► RECOMMENDATIONS/ WHAT TO PAY ATTENTION TO

- If you notice inappropriate handling of personal data, such as leaving it easily accessible or emailing it to a large group of people, please take the necessary measures to prevent the further spread of the personal data, educate the responsible person on the importance of protecting personal data.
- Beware of data transfers between countries. It is important to consider all applicable legal requirements when transferring data across country boundaries as data protection laws vary widely between countries. Protection of personal data may not be guaranteed in the destination country and it is imperative to establish clear rules on how personal data should be handled.

What can be considered as basic rules or actions which every employee can take to protect personal data?

Some basic rules which everyone should apply: obtain a valid and explicit consent for any personal data collection; do not collect personal data without a clear purpose; only collect personal data that is strictly necessary; use the personal data only for the specific purpose it was collected.

We do have technical and organizational measures to ensure information security. Hence, why do I have to care about data protection if it is already technically ensured?

Data Protection starts already when collecting personal data. Consequently it might be a data protection problem to just “have” the data, even if the data is stored securely. Data Protection and Information Security both require your awareness.



Contact:

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Whom to contact

Global Compliance Management

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Chief Compliance Officer Europe and Australia
+49 241 569 2771

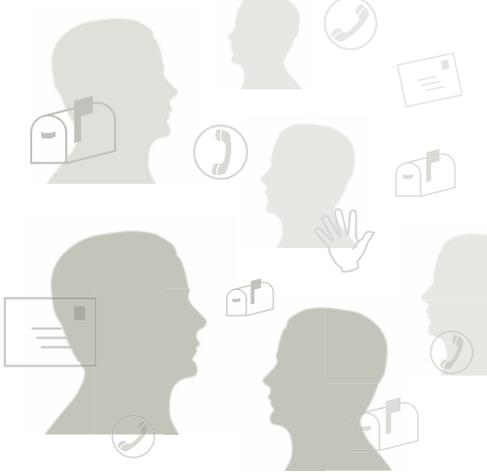
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International Compliance Support Line:
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Local and Regional Compliance Contacts + Department or Functional Contacts

can be found on the Intranet under:
[Group Intranet/Company/Compliance/Whom to Contact](#)



External: Ombuds hotline - Free phone numbers

Country	Free phone number
Australia	1800 121 889
Austria	0800 281700
Belgium	0800 71025
Bolivia	Use international collect call +44 1249 661 808
Brazil	0800 891 8807
Chile	123 002 004 12
Columbia	01800-944 4796
Denmark	8088 4368
Ecuador	Use international collect call +44 1249 661 808
Finland	0800 116773
France	0800 900240
Germany	0800 182 3246
Ireland	1800 567 014
Italy	800 783776
Mexico	01800 123 0193
Netherlands	0800 022 9026

Country	Free phone number
Norway	800 14870
Panama	Use international collect call +44 1249 661 808
Peru	080053611
Portugal	800 880 374
Spain	900 944401
Sweden	0200 285415
Switzerland	0800 563823
United Kingdom	0800 374199
USA	1877 533 5310
Venezuela	0800 100 3199

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Notes



COMPLIANCE, CORE OF OUR CULTURE