

***Policy on Global Trade Law***  
*(Corporate Transparency Project)*

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**APPROVALS**

<i>Areas Involved</i>	<i>Date of Approval</i>	<i>Name (s) and Surname (s)</i>	<i>Signature</i>
Legal	18.10.21		
Corporate Finance	18.10.21		

**CHANGE CONTROL**

<i>Responsible (s)</i>	<i>Changes Originated</i>	<i>Version and Date of Change</i>

## **OBJECTIVE**

This policy on Global Commercial Laws establishes and informs the procedures and principles used by FARMA GROUP to direct its actions towards third parties, with whom it maintains a relationship in the Pharmaceutical Industry.

FARMA GROUP undertakes to comply with the provisions of this policy and in accordance with current legislation on International Trade, which is applicable to it.

## **SCOPE**

The provisions of this policy will be of mandatory application in the treatment of relationships with other natural or legal persons, as well as with clients, suppliers and other participants in the commercialization processes.

## **WHO IS IT AIMED AT**

This policy is aimed at FARMA GROUP collaborators whose responsibility involves acting on behalf of the organization, in relations with other companies or persons of interest, such as: clients, suppliers, shareholders, investors, allies, contractors, subcontractors, and in general, all those with whom some contractual or cooperation interaction is directly or indirectly established, seeking to maintain transparent, responsible and sustainable commercial relations with the same quality standards.

## **GENERAL CONSIDERATIONS**

The application of the Global Commercial Laws by FARMA GROUP in front of the different people who interact with the organization is of vital importance, since ethical behavior must prevail at all levels of the organization.

All FARMA GROUP collaborators must guarantee compliance and application of this Global Commercial Law Policy, implementing and applying the regulations in force where it operates, in line with the FARMA GROUP's organizational principles and the Manufacturing and Supply Chain Policies.

## **POLICY**

For the fulfillment of the mission and vision, FARMA GROUP is related with other actors that participate in industrial, manufacturing, commercial and financial activities, in accordance with the provisions of this policy and the internal regulations or legislation in force. Likewise, in the development of these relationships, the transparency and questioning policy will be applied in order to guarantee transparent, responsible, ethical and socially beneficial interactions.

FARMA GROUP collaborators who act on behalf of the organization must take into account the following:

- The commercial negotiations by FARMA GROUP must be carried out taking into account the principles and international trade rules established in the different regulations in force.
- The materialization of these business negotiations must be done by transparent and legal means.
- Trade negotiations must comply with the organizational principles of FARMA GROUP, summarized in integrity, transparency and zero tolerance for acts that contradict said principles.
- Commercial negotiations on behalf of FARMA GROUP will always be carried out with ethics, clarity and commitment, in order to achieve the objectives defined by the organization.
- Trade negotiation processes must be adapted to the changes in the industry in order to remain competitive in the market, but without neglecting its fidelity to the values of the organization.
- The updating of records and information of third parties with whom commercial negotiations are carried out and with whom business relationships are maintained, is a duty of FARMA GROUP collaborators, as well as the protection of such information, so that it is not used in the wrong way.
- When making a commercial decision on behalf of FARMA GROUP, the collaborator must take into account the following:
  - The values and objectives of the organization.

- The regulations, norms and international treaties applicable to the negotiation.
  - Tools to evaluate, control and manage the risks of the decision.
  - The effect that this commercial decision can have on consumers and patients, on the organization and on ourselves.
- The exchange of information or the interactions that take place during commercial negotiations must be timely, precise and consistent with the values of FARMA GROUP, as well as comply with the approval procedures established in the organization.
- The exhaustive record and documentation of the commercial negotiations carried out must be ensured, to guarantee that each commercial operation is traceable, responsible and inspected without difficulties.
- The collaborators of FARMA GROUP will disclose the information of the commercial negotiations when the authorities so require, through the legally existing mechanisms, to comply with labor and tax regulations, and meet administrative and judicial requirements.

## GLOSSARY

**Collaborator:** Term used to refer to the FARMA GROUP worker.

**Global Trade Laws:** They are all those international norms and rules applicable to commercial activity between people from different countries and cultures, including INCOTERMS.

**INCOTERMS:** these are rules drawn up by the International Chamber of Commerce, which are used in international sales contracts. Its name comes from international commercial terms (international terms of trade).

**Materialization:** it consists of the execution of the commercial negotiations agreed between FARMA GROUP and the persons of interest.

**Commercial Negotiations:** these are those processes in which FARMA GROUP interacts with another natural / legal person, to initiate a commercial relationship.

**Commercial Relationship:** it is the result of the commercial negotiation, consisting of the development of the agreements established between FARMA GROUP and the other contracting natural or legal person.