

# ABAC policy





# About Our Company

Modern healthcare environment is a very challenging area that demands an experienced partner who can creatively **Think** how to successfully deliver innovative solutions in the **Health** sector using all modern **IT** advancements, while operating on time and on budget, aiming at providing the best possible outcome.

Inspired by the synthesis of key words Health, IT and Think and their combined significance to current demands, HealThink was founded to provide high class research, innovation and development services in the health and social care sector. HealThink realizes the importance of bioethics and the ethical challenges that arise relatively to healthcare and health research, offering full scale bioethics consultancy in the healthcare sector.

# Anti-Bribery & Anti-Corruption Policy

HealThink conducts its business professionally, with integrity and in compliance with national laws and regulations. Our Company provides services to pharmaceutical industry concerning a high-risk activity (public health, assessment, reimbursement of medicines etc.), so the cornerstone of HealThink's values is to ensure integrity.

Our reputation for acting fairly is built on our values as a Company and the values of our employees. The ABAC policy applies to all individuals working at all levels and grades, including senior managers, directors, employees, consultants, contractors, or any other person associated with us. As part of our commitment to ethical business practices, we have zero tolerance towards all forms of corruption.



# Anti-Bribery & Anti-Corruption Policy

Corruption includes, but is not limited to:

- **Bribery**

It is strictly prohibited, to promise, offer, authorize, solicit, or accept any financial (cash, loans, travel expenses) or other advantage (gifts, services, entertainment, hospitality) directly or indirectly, to or from anyone to influence business, or obtain advantage.

- **Fraud**

We do not conduct transactions resulting from crime including bribery, fraud and tax evasion. This applies to our interactions with government officials, pharmaceutical companies, healthcare professionals and any third party.

- **Tax evasion**

We are against facilitating evasion of taxes.



## Books and records

All Company business transactions must be fully and fairly recorded in accordance with the Company's accounting principles and other appropriate requirements established by law.

We fully record and audit all our business transactions with transparency, and we disclose that HealThink's financial condition and results or operations are accurate and in accordance with the applicable laws.



# Healthcare Professionals and Government Officials

Many of our services require continuous communication and/or in person meetings with healthcare professionals and government officials.

*There is a high degree of risk when we interact with the government officials who may be in an actual or perceived position of influence which could affect our business. HealThink prohibits facilitation payments to government officials to expedite the performance of routine governmental actions (e.g., obtaining permits, or other needed government documents).*



# Healthcare Professionals and Government Officials

Laws and regulations may apply to such relations. If any project requirements involve interaction with government officials or healthcare professionals, we must make certain such interactions:

- Act in accordance with our policies and procedures, applicable regulation, and ethics
- Adhere to a business purpose such as training or medical research
- Do not interfere or appear to interfere with a healthcare professional's independent medical judgment or a Government Official's performance of duties.

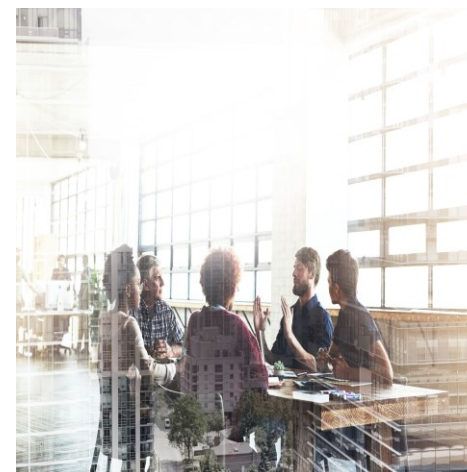
Gifts, meals, and other benefits must never be for the purpose of, or of such value, that they are likely to improperly influence the medical or professional judgment or decisions of government officials or healthcare professionals. No gifts, meals, or entertainment may be offered to without the prior written approval of the Legal & Corporate Affairs Director. In addition to complying with our general standards of integrity and ethical conduct, HealThink's employees must act with integrity in interactions with government officials and healthcare professionals.



# Training

The Company provides mandatory ABAC training to its employees and third parties aligned with their roles, responsibilities and risks they face. The Legal Department is responsible to raise awareness with regards to the ethical importance and critical role of this ABAC policy.

- All new hired personnel must receive training and confirm that they have understood this policy as part of their on-boarding process.
- Additional training is provided for certain employees, as decided by Legal Department.
- Training programs should also be extended to third parties if it is envisaged that the work profile allocated to them carries a significant risk as per the anti-bribery policy.





# Employee Interaction

Employees should refrain from:

- Instigating inappropriate or illegal financial procedures or influencing HealThink's internal accounting controls or create false or deceptive books and records.
- Being involved in bribery by improperly influence third party actions using anything of value.
- Accepting an improper advantage.
- Offering anything of value, to obtain improper advantage (e.g., bribes, gifts, or favors) or acting with an improper motive, or wrongly influence the recipient of a payment.
- Being involved in money laundering (e.g., financial transactions that are designed to conceal or disguise the nature, location, source, ownership of the proceeds of an illegal activity).
- Making facilitation payments (e.g., payments made directly or indirectly to a Government Official to secure, avoid, or speed up the performance of a routine government action to which an Employee or the Company is legally entitled).
- Accepting or soliciting any personal benefit from a supplier or a potential supplier that might compromise or appear to compromise their objective assessment of the suppliers' products and prices. Employees dealing with suppliers should carefully guard their objectivity.



# Conflict of Interest

A conflict of interest is a situation indicating a risk that personal interest will interfere with the legitimate business interests of HealThink. Any conflict of interest creates an appearance of impropriety, which may undermine confidence in our Company and for this reason it is essential to identify any potential conflict of interest and handle it effectively. To ensure our business judgement is not influenced by personal interests, we will disclose and manage potential, perceived and existing conflicts of interest.

We respect everyone's right to be involved in personal activities outside the scope of their job as long as they do not interfere with their work responsibilities and Company's interests. Any activity or relationship that might conflict with the Company's interests must be avoided.

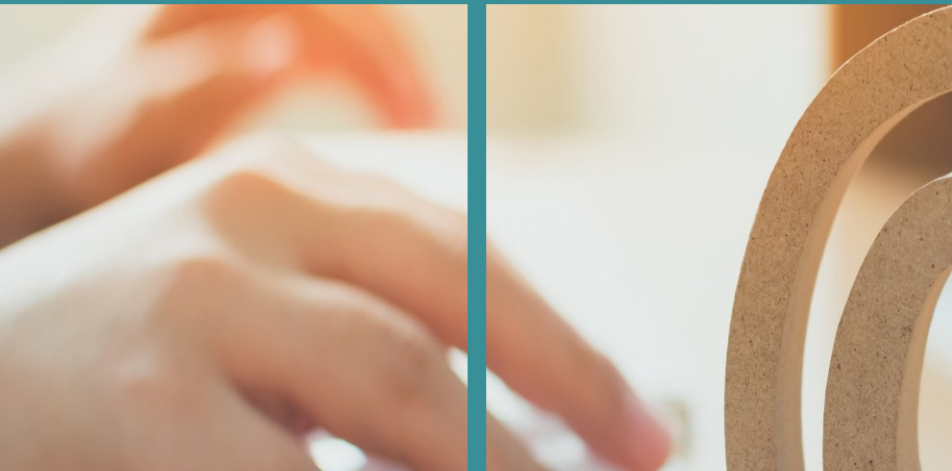


# Donations / Sponsorships

Donations and sponsorship activities are made to third parties for a charitable or social cause. Before conducting any payments of such, we are ensuring that they are:


- Legal, ethical and in accordance with local regulations.
- Transparent and properly documented.
- Not made to pass any undue favor or advantage to specific third party/ government official/political party/politically connected person.

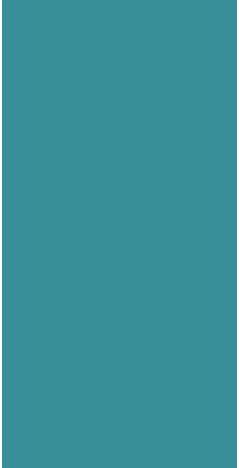




## Get in Touch With Us

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# HEALTHINK

Medical Research & Innovation

