



Fair Trade Practices




HEALTHINK
Medical Research & Innovation





About Our Company

HealThink

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.

Fair Competition

Competition drives innovation and leads to greater choice of higher quality products and services at competitive prices, benefiting patients and society. HealThink competes vigorously and fairly for business based on the merits of our services.



Fair Competition

- We conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which we conduct business.
- We refrain from all unfair behavior towards competitors.
- We do not seek competitive information illegally or in any improper way and we use only from public sources (websites, public presentations, journal articles, or advertisements etc.).
- We do not use customers' or competitors' employees as sources of non-public information.
- We do not make false claims or remarks that unfairly disparage competitors, or improperly interfere with a competitor's business relationships.
- We do not misrepresent who we are or for whom we work.
- We always keep confidential the information of our customers, vendors, and competitors.



Anti-Bribery and Anti-Corruption

HealThink does not tolerate any form of bribery or corruption.

- We comply with all applicable anti-bribery and anti-corruption laws.
- We do not give, offer or promise to give anything of value or accept, request or agree to receive anything of value for the purpose of improperly influencing any decisions.
- We do not use third parties to commit acts of bribery or corruption.
- We prohibit facilitation payments.
- We seek guidance from Legal & Corporate Affairs Director in case of any doubt.



Anything of value *may include but is not limited to:*

- *cash gifts*
- *entertainment, accommodations and meals*
- *travel expenses, services, employment offers, loans*
- *donations or contributions*
- *any transfer of value, even of nominal value.*

Financial Integrity

Financial integrity is essential for the healthcare and pharmaceutical sectors. HealThink provides services to the above-mentioned, so we strongly believe that our financial status/ statements should be disclosed and reliable.



Financial Integrity

- We keep accurate financial records, and we disclose them in accordance with the applicable law.
- We maintain regular controls to ensure accuracy and completeness of the records.
- We watch for inaccurate transactions, invoices and payments.
- All payments and transactions are approved by the General Manager.



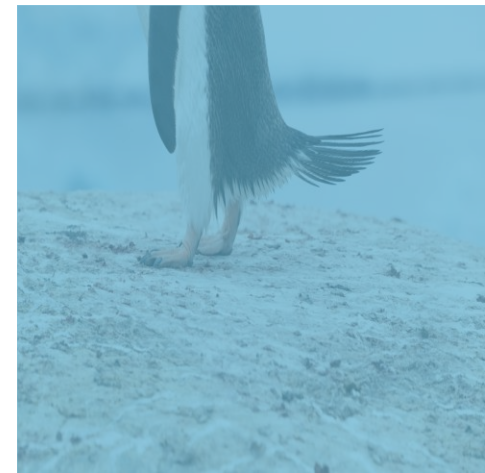
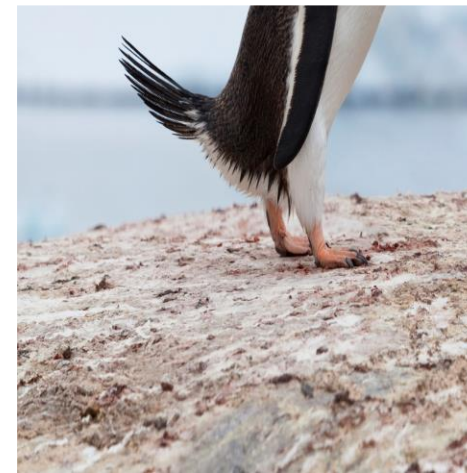
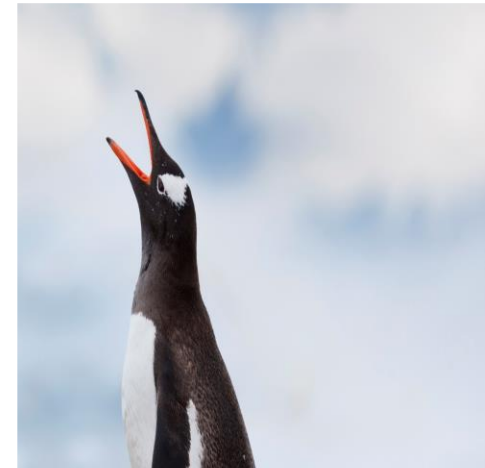
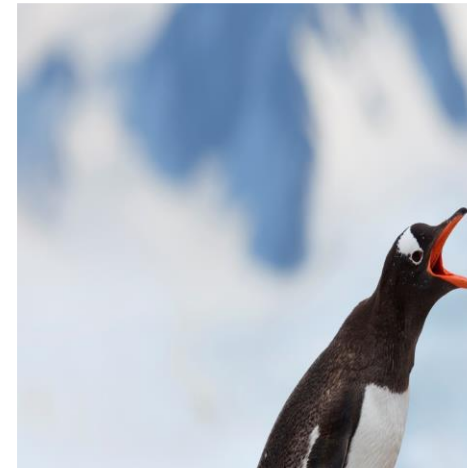
Conflict of Interest

To maintain trust and confidence with all our stakeholders, we must ensure that we make decisions that are in the best interest of our company, our customers and society.

A conflict of interest is a situation posing a risk that personal interest will interfere with HealThink's legitimate business interests. Any conflict of interest creates an appearance of impropriety, which may undermine confidence in our company. For these reasons, 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 his/her job as long as they do not get in the way of the work responsibilities. Any activity or relationship that might conflict – or appear to – with HealThink's interests must be avoided. Such a situation can arise in a variety of ways.

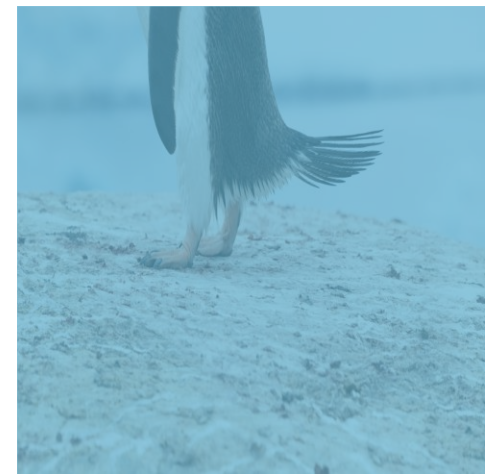
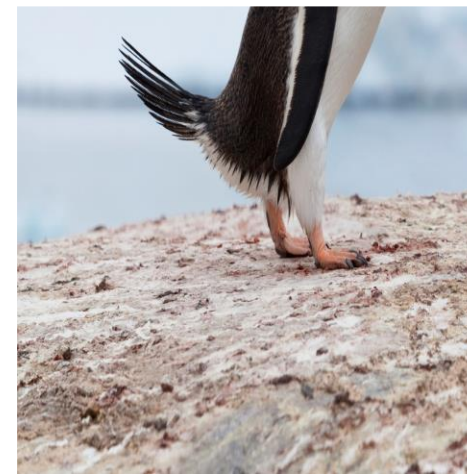
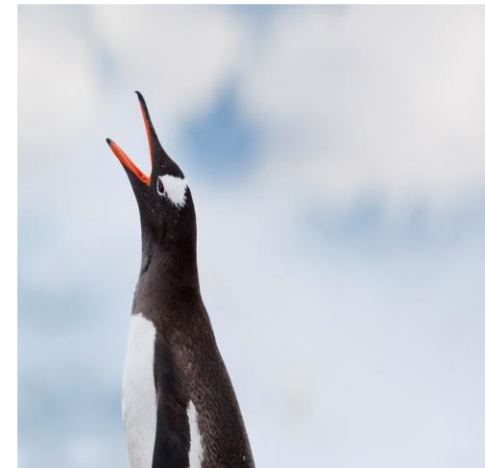


External Commitments

- Working for or receiving compensation from a HealThink's vendor or customer
- Maintaining a financial interest in or a relationship with a HealThink's competitor, customer or vendor, or with any third-party doing business with HealThink
- Soliciting personal benefits from a third party for influencing a favorable decision by HealThink towards such third party
- Engaging in any outside activity substantial enough to raise questions about our ability to devote appropriate time and attention to our assigned responsibilities.

Personal Relationships

- Interacting with a relative working for, or applying to work for HealThink, a competitor, vendor or customer of HealThink
- Purchasing goods or services on behalf of HealThink from a relative or a firm in which a relative has any interest
- Receiving an item of value
- Accepting a gift might cause the receiver to feel an obligation, potentially undermining the objectivity of his/her decisions, and may be perceived as a gift intended to corrupt him/her or another HealThink's employee.



Interaction with Business Partners

We conduct our business in a highly competitive environment and in the significant sector of health. We acknowledge our responsibility to our partners, customers, providers and we use the best corporate practices.



Interaction with Business Partners

- We are committed to dealing with all our business partners fairly, openly, and with integrity.
- We select business partners based on appropriate criteria that are directly related to our business objectives, including, but not limited to, price and quality of goods or services, capability, reputation, and commitment to anti-corruption, human rights, environmental protection, and other ethical and social responsibility standards.
- We do not put our personal interests ahead of Company interests when selecting business partners.
- We ensure that appropriate contracts or other comparable documents are in place for all business arrangements with third parties prior to the provision of the services.
- We negotiate in good faith with our potential business partners to ensure all compensation we pay for their goods or services does not exceed fair market value and is in proportion to the services being provided.
- We never solicit or request (either explicitly or implicitly) any payment, gift, meal, or other item of value (whether tangible or intangible) from our current or potential business partners.



Interaction with Healthcare Professionals and Government Officials

Many of HealThink's services require contact with healthcare professionals and government officials. Laws and regulations often apply to such relations.



Interaction with Healthcare Professionals and Government Officials

- We comply with our policies and procedures, applicable laws /regulation and code of ethics.
- We always serve a legitimate business need for these interactions.
- We select Healthcare Professionals and Government Officials based on their expertise related to the specific need.
- We sign a written contract and keep detailed documentation of the interaction.
- The compensation (of HCP) reflects fair market value for the services provided and is paid to Greek Bank accounts (of HCP).
- We do not interfere or appear to interfere with a healthcare professional's independent medical judgment or a Government Official's performance of duties.
- We seek guidance from Legal & Corporate Affairs Director in case of any doubt.





Responsibilities

Legal & Corporate Affairs Director

The Legal & Corporate Affairs Director, as HealThink's Compliance Manager, is responsible for overseeing the company's compliance policy related to fair competition and antibribery and anti-corruption law, including the monitoring and evaluation of the interaction with business partners, HCP and governmental officers. The Legal & Corporate Affairs Director ensures the broad application and consistent interpretation of our policy and resolves any doubt regarding conflict of interest.

Associates and Approved Suppliers/Vendors

All HealThink's associates and approved suppliers/vendors are responsible for upholding the highest standards when conducting business of behalf of HealThink. They are therefore expected to conduct HealThink's business based on:

- standards of honesty, loyalty, trustworthiness, fairness, concern for others and accountability,
- good judgment and common sense, and
- being sensitive to any situations that can adversely impact HealThink's reputation, and the integrity of the services offered by HealThink.

Open Door Policy

The quick and effective resolution of complaints, problems and conflicts is the basis for a harmonious social life at the workplace, as well as for a smooth cooperation with customers and suppliers.

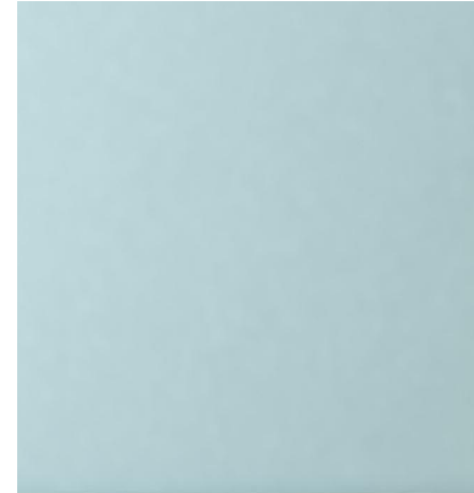
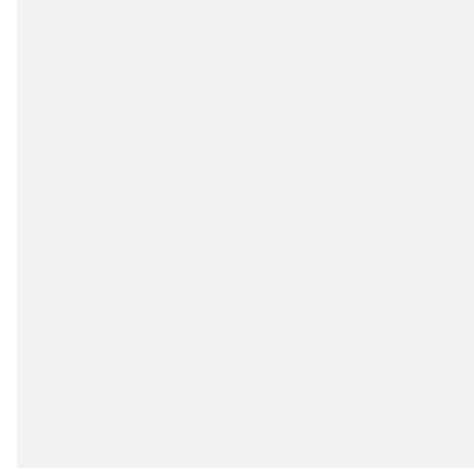
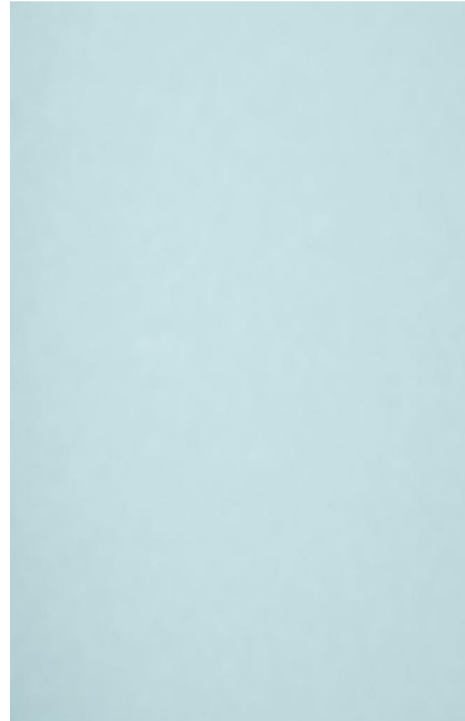
Therefore, the Legal and Corporate Affairs Director has the responsibility to maintain a direct, informal communication line and encourage associates to address themselves directly to him/her and speak openly about any issue, at any time.

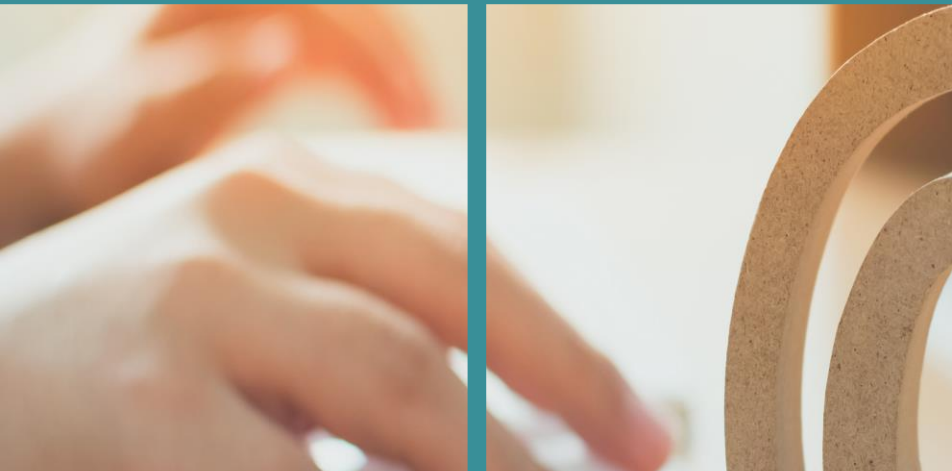


Confidential Disclosure Policy

HealThink maintains a confidential disclosure policy that allows associates to report to HealThink's management suspected violations of national or European requirements or of HealThink's policies and procedures. HealThink's management will make a good faith inquiry into any reported violation.


HealThink shall not tolerate retaliation against any associate who reports a suspected violation in good faith or who participates in any investigation of a suspected violation. HealThink thus commits to investigate any reported case of retaliation and to take appropriate action to prevent future occurrences.

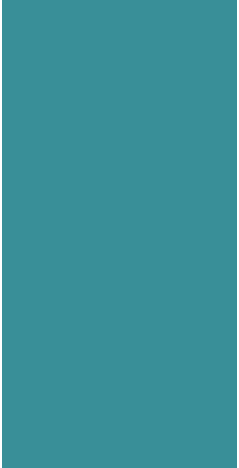




Get in Touch With Us

 healthink@healthink.info

 +30 2310 407 200



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