

International Commercial Law Policy
(Corporate Transparency Project)

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APPROVALS

<i>DEPARTMENTS</i>	<i>Approval Date</i>
Corporate Finance	18.10.21

CHANGE CONTROL

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

OBJECTIVE

This policy about International Commercial Laws establishes and informs the procedures and the principles that GRUPO FARMA uses to direct its actions towards third parties, with whom it has relationships with, within the Pharmaceutical Industry.

GRUPO FARMA commits to complying with the provisions of this policy also in accordance with current International Trade laws.

SCOPE

The provisions of this policy are mandatory with all persons, as well as with clients, suppliers and other participants in the commercialization processes.

WHO DOES IT PERTAIN TO

This policy is directed to the employees of GRUPO FARMA whose responsibility involves acting on behalf of the organization, has relationships with other companies or persons of interest, i.e. clients, suppliers, shareholders, investors, allies, contractors, subcontractors, and in In general, to all those with whom established directly or indirectly any negotiation or contract with the company. The objective is to always maintain transparent, responsible, and sustainable business relationships.

GENERAL CONCERNS

International Commercial Laws are of the essence because of the diverse interaction GRUPO FARMA has with other organizations. We demand ethical behavior at all levels of the organization.

All GRUPO FARMA employees must guarantee compliance with this Policy, implementing and completing the regulations enforced where they apply, in accordance with the organizational principles of GRUPO FARMA and the Manufacturing and Supply Chain Policies.

POLICY

In order to fulfill our mission and vision, GRUPO FARMA interacts with other participants in industrial, manufacturing, commercial and financial activities, in accordance with the provisions of this policy and the internal regulations or legislation enforced. Transparency and questioning will be applied as the beginning of these relationships in order to guarantee transparent, responsible, ethical and socially beneficial interactions.

GRUPO FARMA's employees who act on behalf of the organization must take into account the following:

- All commercial negotiations must be conducted while considering all international commercial laws and regulations.
- The materialization of these commercial negotiations must be transparently and legally done.
- Commercial negotiations must comply with the organizational principles summarizing integrity, transparency and zero tolerance for behavior that contradicts them.
- Commercial negotiations on behalf of GRUPO FARMA will always be carried out ethically and clearly with commitment to achieving the objectives defined by the organization.
- The commercial negotiation processes must adapt to the changes that occur in the industry, in order to remain competitive in the market but without neglecting the values of the organization.
- Updating third parties records and information with whom commercial negotiations are carried out and with whom commercial relationships are maintained, is a duty of the employees at GRUPO FARMA, as well as is the protection of said information.
- When making a commercial decision on behalf of GRUPO FARMA, the employee must take into account the following:
 - the organization's values and objectives

- The regulations, norms and international treaties which apply to the organization.
 - Tools to evaluate, control and manage the risks of decision making.
 - The effect that commercial decisions can have on consumers and patients as well as on the organization and on ourselves.
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- The exchange of information or the interactions that take place during commercial negotiations must be timely, precise and consistent with the values of GRUPO FARMA, as well as comply with the approval procedures established within the organization.
 - The recording and documentation of commercial negotiations conducted must ensure that each commercial operation is traceable, responsible and auditable without difficulties.
 - GRUPO FARMA's employees will disclose information of commercial negotiations when the authorities so require, through legal mechanisms in order to comply with labor and tax regulations and attend to administrative and judicial requirements.

GLOSSARY

Employee: Term used for someone who works at GRUPO FARMA..

International Commercial Laws: is a body of legal rules, conventions, treaties, domestic legislation and commercial customs or usages, that governs international commercial or business transactions. A transaction will qualify to be international if elements of more than one country are involved.

INCOTERMS: They 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).

a widely-used terms of sale, are a set of 11 internationally recognized rules which define the responsibilities of sellers and buyers. Incoterms specifies who is responsible for paying for

and managing the shipment, insurance, documentation, customs clearance, and other logistical activities.

Commercial Negotiation: They are those processes in which GRUPO FARMA interacts with another person(s) to initiate a commercial relationship.

Business Relationship: It is the result of commercial negotiation, consisting of the development of the agreements established between GRUPO FARMA and other person(s).