



VIGA Life: Standards of Business Conduct

# Standards of Business Conduct

## CONFLICTS OF INTEREST

We have a responsibility to make decisions strictly on the basis of the Company's best interests, without regard to personal concerns. A potential conflict of interest arises when we become involved, directly or indirectly, in outside activities that could impair, or be perceived to impair, our business judgment. Every VIGA employee must avoid situations that present or create the appearance of a potential conflict between private interests and those of the Company and in which his/her loyalty is, or appears to be, divided.

Even the appearance of a conflict can damage your reputation or that of the Company. Many potential conflicts of interest can be resolved in a simple and mutually acceptable way. If one believes he may have a potential conflict of interest, he must discuss the situation with his/her manager. All potential conflict of interest must be disclosed to and approved by your manager.

While there are many situations which may create a potential conflict of interest, the following represent the most common types of conflicts which you may face, as well as specific situations that all employees should avoid:

- Having a personal financial interest in a supplier, customer, competitor or distributor;
- Having a close family member or anyone you treat like a family member, work for a supplier, customer, competitor or distributor;
- Receiving any form of fees, commissions or other form of compensation from any entity with which the Company does business
- Having a personal interest or potential for gain in any Company transactions;
- Having a close family member work at an agency that approves our drugs;
- Hiring an employee/consultant due to their family relationship with government decision makers; and
- Having involvement in any outside business activities that compete with any Company business;