



VIGA Life: Standards of Business Conduct

Standards of Business Conduct



ETHICS

We observe the highest ethical standards in all of our business transactions. In addition to observing all local, state, federal and country laws and regulations, we must uphold our Company's ethical standards, even if they are more demanding than local customs or practices.

ANTITRUST AND COMPETITION LAWS

Antitrust and competition laws protect free enterprise. While these laws are complex and difficult to summarize, at a minimum they prohibit agreements between VIGA and our competitors that affect prices, terms or conditions of sale, or fair competition.

Our principles of fair competition require that:

- We compete aggressively in every market for every customer. We make no agreements — nor general understandings — with competitors concerning customers, distributors or territories.
- We comply with trade regulations and restrictions approved by recognized national and international authorities.
- We do not enter into agreements with competitors that allocate markets or customers;
- We do not share or exchange price or bid information with competitors. This includes pricing policies, discounts, promotions, royalties, warranties and terms and conditions of sale
- We do not contact suppliers and customers in a way that unfairly restricts trade or excludes competitors from the marketplace; and
- We do not enter into agreements with others to boycott customers or suppliers.

PREVENTING BRIBERY AND CORRUPTION

Offering or making payments to obtain favorable treatment, to secure business, or to obtain an improper advantage is a crime in every country in which we do business, whether such payments are in cash or in kind. VIGA has a long-standing policy that prohibits VIGA colleagues from offering, giving, soliciting, accepting or receiving a bribe. We must not offer or give and accept money or anything else of value either as an inducement to make, or as a reward for making, any decision favorable to the interests of VIGA. As well as not offering bribes, we must also not accept them.

However it is acceptable to engage the services of healthcare professionals and organizations, and provide modest and customary meals and gifts, as long as they comply with any local laws and applicable codes and our supporting policies. We make sure all gifts, activities and conduct are of a nature that would not be open to misinterpretation if publicly disclosed. If anyone notices, one should report any suspicion of potentially corrupt behavior.



GIFTS AND HOSPITALITY

GIVING GIFTS

We believe in competing on the merits of our products and services and wish to avoid even the appearance of improper conduct with our clients. The giving of gifts whether in cash or non-cash, including services, to anyone we do business raises serious questions about conflicts of interest . Therefore ,the giving of gifts is prohibited unless it complies with the specific exceptions. We recognize that in certain cultures there may be an occasion when gift-giving is customary and expected. Decisions about these situations are carefully weighed at VIGA.

We interact with wholesalers , distributors and retailers. With respect to these customers, only business-related items of nominal value are permissible. We execute this only if it is complying with local laws, Company policies and relevant industry codes.

RECEIVING GIFTS

The receipt of gifts may be more common in the context of supplier relationships. As a common business courtesy, we may receive occasional gifts, provided that:

- The gift is of nominal value (e.g., pens, note pads, calendars, etc.);
- Doing so is legal; and
- The gift is neither intended nor likely to be perceived by others to improperly influence our business decisions.

PROVIDING MEALS & OTHER HOSPITALITY

We may provide occasional meals or hospitality ,provided that it is:

- In the course of a bona fide business relationship;
- An accompaniment to an educational or business event/function;
- Legal;
- Consistent with applicable industry codes;
- Consistent with Company policies and procedures;
- Not likely to be perceived as an attempt to improperly influence business decisions; and
- Not embarrassing to the Company if it were to receive public scrutiny.