

PSIMITIS S.A.

CODE OF BUSINESS CONDUCT



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PSIMITIS SA

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1. INTRODUCTION

The reputation of PSIMITIS SA (The Company) for legal, moral, and ethical behavior is one of the company's most valuable assets. This reputation is built upon a policy of strict compliance with the law and the conduct of the business with the highest standards of moral and ethical behavior. The company mission statement, the values and the present Code of Business Conduct (The Code) provide the guidance essential for success as a premier provider of cardiovascular medical products in Greece.

The present Code is intended to inform employees and third parties of the legal and ethical obligations and the commitments of The Company to its customers, employees and community in general. Given the legal and regulatory complexity of today's medical markets it is essential to have such a guiding line, which must be conformed and adhered by all personnel across the Company hierarchy from bottom to the very top.

Psimitis Management is responsible for setting the standards of business conduct contained in this Code and updating these standards as it deems appropriate to reflect changes in the legal and regulatory framework and rules, the business practices and the prevailing ethical standards of the community. It is the individual responsibility of each employee to comply with this Code.

2. COMPLIANCE WITH THE LAW AND THE REGULATIONS

The Company and its employees shall comply with all applicable national and international laws and regulations concerning the manufacture, distribution and use of medical products. The Company is committed to providing customers and patients with safe, effective, quality products that meet their needs and advance the delivery of patient care.

The Company complies with all applicable product regulatory requirements, on the development, manufacture and distribution of medical products, the conduct of clinical studies, product design control, marketing applications and literature, quality system requirements, product labelling, promotion and advertising, customer complaint handling and post-market surveillance activities.

The Company is accredited from all responsible authorities and if it is not possible to participate successfully in any business endeavour while complying with this policy, the company will not participate in that business.

Medical devices and products distributed by The Company meet all regulatory requirements worldwide and comply with governmental agencies, health ministries and other medical devices regulatory authorities worldwide. Every employee is responsible for compliance with product regulation requirements and adheres of manufacturer guidelines including marketing approvals and clinical studies, best practice and use of the products requirements and standards, product designs controls, product labeling and advertising and any other surveillance activities.

Each employee is responsible for reporting any significant or quality issue to Management and/or the Quality Manager. The Quality Manager has the responsibility to express independent view and to raise any significant matters to the Management. The Company is committed to maintain an open, constructive, accurate and professional relationship with the business partners, the workplace and framework for compliance with the regulation requirements of the products.

3. CLINICAL AND REGULATORY AFFAIRS

Marketed products are heavily regulated by governmental agencies, health ministries, and other regulatory authorities. Employees are responsible for compliance with regulation requirements and adhere of manufacturer guidelines. They are also responsible to comply and disseminate evidence based best practice and use of the products and to comply with internationally accepted scientific, regulatory and ethical standards in cases where research programs are pursued or supported.

4. PRODUCT QUALITY

The Company is committed to providing the Greek Health Care market with the highest quality medical devices and products in the interest of patient safety and to maintain its reputation for excellence through customer focused quality. The Company complies with all laws and regulations regarding the safety and efficacy of products and the standards. Each employee is responsible for reporting any concerns that relate to a compromise of quality to senior management and the Quality Manager.

5. SERVICE QUALITY

The Company provides a comprehensive package of service to meet customer needs including, extensive product training and effective after sales service and biotechno-vigilance, which enables immediate and effective location, communication and recall of any products. Nonstop, 7-day / 24-hour, technical and sales support, to meet effectively and timely any customer request and need regardless of time, location or difficulty.

Mechanisms for collecting and analyzing, on a continuous basis, feedback from customers on their satisfaction and the means to improve the way in which we respond and meet their requests and needs. Finally, the Company guarantees outstanding biomedical engineering support for the establishment, operation and maintenance of the medical equipment and devices it provides to customers.

6. ACCREDITATION

The Company is devoted to a doctor and patient focused policy, offering them products and services of high quality. In this context it applies a thoroughly structured

Quality Control, Administration and Accreditation System, which is based on the real functional conditions and the objectives of the enterprise.

In this way, it offers to all its employees the indispensable guidance in order to ensure, on a constant basis, high quality of products and services delivered. The quality system concerns all the departments of The Company and every employee follows the procedures and contributes actively not only to its constant application but also to its continuous improvement.

Warehousing and distribution of products guarantees clean and controlled conditions, good organization, appropriate temperature and overall quality. There are written reports and details for all products, a thorough vigilance system and all data and information are available upon request for any kind of control from the authorities and the manufactures. Products are not provided if they are destroyed, or the package is opened, or they are expired or if there is any proof that they will be used out of label indications or out of the territory of distribution of The Company. The personnel authorized to support the product is sufficiently trained and there are detailed records of their training.

7. COMPETITION AND ANTI-MONOPOLY POLICY

The Company and its personnel adhere to antitrust, anti-monopoly laws and promote free, fair and open competition in the marketplace, avoiding collaborative actions with competitors and exploitation of discriminate power against the Health System.

Activities and actions forbidden may include agreements or understandings with competitors, either directly or through others to fix prices, price discrimination, divide customers or territories, or restrict sales; exchange of pricing or other proprietary information with competitors; and Illegal tying, illegal price discrimination or refusals to deal.

The Company complies with antitrust, providing the scientists of the Health Care System in Public and Private sector with all the available information & data for the products, advancing medical knowledge and technology, promoting the technical and financial characteristics of the products and the excellent service to all customers.

In cases where any collaborative action with a competitor is planed or in cases where any action may have improper anti-competitive effect, legal advice is being first sought. Psimitis employees are expected to understand the antitrust principles that apply to their activities and seek guidance from management and the Legal Counsel in any circumstances where doubt exists.

The Company treats all business entities with respect, fairness, equity, courtesy, comfort, justice and ethical behavior and forbids any discrimination, harassment or intimidation or illegal activities.

8. ADVERTISING AND PROMOTION

The Company and its personnel should ensure that all promotional presentations, claims, comparisons are accurate, balanced, fair, objective and unambiguous, justified by appropriate level of evidence. Promotion should encourage the rational use of medical products. Published studies should be referenced as well as all sources of data supporting claims. Comparisons should be fair and based on actual data and differences between products. Quotations must be also actually reproduced and sponsorship of any activity must be acknowledged and promotion should not be disguised.

The Company is committed to ensure that any information, communication, material, advertisement is full, fair, accurate, timely and understandable and in accordance with the regulation requirements and this Code of Conduct.

9. MEDICAL SALES PERSONNEL

The medical sales force personnel must approach their duties with responsibility and ethically and they must provide in visits accurate and approved information on the products. They must also immediately provide feedback on the use, safety and side effects of the products. They should be effective, timely, well organized and not causing inconvenience to health care professionals. They should not mislead and any promotional material should be approved and be according to the rules of the Code.

A main objective at Psimitis is to be committed to excellence, reliability and responsibility and to support customers on a continuous basis and in an effective manner. In this context the Company plays emphasis on having very well trained and skilled sales force, which is supported by highly trained, motivated and specialized experts on biotechnological products and devices.

There is continuous training of the sales force around the state of the art and the latest developments regarding the fields and the products provided to customers and constant coaching and development of staff towards performance that meets and exceeds customer expectations, with efficiency, quality and decency.

10. FAIR DEALING

All employees should deal fairly with customers, suppliers, competitors and fellow employees. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

11. CONFLICT OF INTEREST

All employees owe a duty of undivided business loyalty to The Company. This duty is breached when an employee engages in activities that cause a conflict of interest. Conflicts of interest may arise when considerations of gain or benefit to an employee or an employee's immediate family members conflict with or appear to conflict with the employee's obligation to serve Psimitis' best interest or the employee's ability to perform company work objectively and effectively.

Anything that would be a conflict of interest for an employee may also be a conflict of interest if it involves an immediate family member. Conflicts of interest can take many forms, such as: a.) consulting with or employment by a competitor, supplier, or customer; b.) holding a substantial equity, debt, or other financial interest in any competitor, supplier, or customer; c.) having a financial interest in any transaction that involves or may impact the company; d.) using employees, materials, equipment, or other assets of the company for any unauthorized purpose; e.) accepting any cash, gifts, entertainment, or benefits that are more than modest in value from any competitor, supplier, or customer, without knowledge and approval from senior management; f) selecting colleagues or supplier due to improper personal benefits or financial gains; g) representation and use of the Company's name without prior permission from the management; h) any kind of investment or payments of competitors, customers or suppliers; i) receipt of benefits or profits either from external entities or from the Company but not known to the Company's management

Each employee is responsible for avoiding conflicts of interest as well as the appearance of such conflicts. Employees who are unsure whether they are involved in a conflict of interest or whether an action might create a conflict of interest should discuss the issue with the management of the company. Every employee must act at the best interest of Psimitis and must avoid any situation that may lead to conflicts of interests. Vendors and any business partners must be selected on the basis of quality reliability and effectiveness.

Employees should not accept or give gifts or loans to business partners and associates and should not use products, personnel, assets, resources, equipment of any kind, including computers, software and communication equipment for use outside the strict interests of Psimitis and its business. If an employee becomes aware of any business opportunity that may be of interest to the company must inform senior management. If an employee realizes that another employee breaches this Code and is involved in activities that represent conflicts of interest must inform immediately senior Company management. The contract of an employee caught to violate this term of the Code may be terminated.

12. INTELLECTUAL PROPERTY & CONFIDENTIAL INFORMATION

Confidential information is information about The Company, its products, its manufacturing partners, its strategies and its customers that is not generally known or readily available to others. Measures are in place to prevent inappropriate disclosure or loss of such information and employees must adhere to them and be self disciplined. Confidential information includes technical know-how and data, trade secrets, business plans, marketing and sales programs, sales figures, prices of products, financial data, projections, customers and suppliers data, management systems, databases, computer software and personal information about employees, such as number of employees, salaries, benefits, and information contained in personnel files.

Confidential information may be stored and located in documents, letters, presentations, files, videos, audio files and computer data. The Company and the

personnel must protect such information against unauthorized access. Confidential information must not be shared with others outside the company except pursuant to approved business relationships and employees shall not be involved in any activities that infringe the confidential information rights of other third parties. To avoid inadvertent disclosure of confidential information, employees shall not discuss confidential information with or in the presence of unauthorized persons, including family members, relatives and friends and shall take appropriate protective measures against unauthorized access.

Nonetheless, employees should on the other hand report through the management line any information that is in the public domain and may affect the interests of Psimitis, including information on competitors and their products, clinical studies, good manufacturing practice standards, competitor activities and marketing plans, changes in the management and the status of customers and competitors and others.

13. PROTECTION AND PROPER USE OF ASSETS

All employees should protect The Company's assets and promote their efficient use for legitimate and legal only business purposes. Theft, carelessness and waste have a direct impact on profitability and will and discipline action will be taken if detected. The same applies for misuse of Company assets, like for instance the abuse of computer systems and the surfing on unauthorized internet sites that may expose The Company and its reputation.

14. CORPORATE OPPORTUNITIES

Employees may not take for personal use opportunities that are discovered through the use of corporate property, information or position, nor may they use corporate property, information or position for their own personal gain and for business or tasks outside the interests of The Company or to compete with Psimitis. Employees have a duty to advance Company interests when the opportunity to do so arises.

15. INQUIRIES AND COMPANY REPRESENTATION

Senior management must be made aware of any inquiries about The Company from any authority, the media, competitors or any party so that it can properly and thoroughly respond. If an employee is contacted by anybody making a non-routine request for documents, interview or company information, that employee should be aware of the fact that the Government and the authorities are allowed to contact and request to speak with him/her immediately but at the same time he shall contact senior management so that they can make arrangements for the proper representation of The Company. In any case if employees have doubts, they should ask for guidance and authorization before revealing any information of the Company.

In case an employee participates as a speaker in a forum, is being approached by the media, and is asked to make an external presentation, or wish to publish information about his/her work through electronic communication in blogs he must

specify that he/she is presenting his/her personal opinion and not the opinion of The Company.

16. PEOPLE ACTING ON BEHALF OF THE COMPANY

The Company expects that any independent party acting on its behalf will comply in full with the policies set out in this Code. The personnel is responsible to ensure that the terms of the relationship are set out in a written agreement, provide a copy of the Code, and require signature and compliance with the Code in all dealings on Company's behalf. Promoting or engaging in any practices that violate the principles of this Code may result in termination of the relationship.

17 . CODE OF ETHICS FOR SENIOR FINANCIAL OFFICERS

In addition to being bound by all other provisions of this Code of Conduct, the Chief Executive Officer (C.E.O.), the Managing Director, the Finance Director and the Accounts Manager are subject to respond to additional specific policies, regulations and financial, accounting and tax rules.

18. RECORDKEEPING AND BOOKS

The Company maintains accurate and reliable company records and accounts in order to ensure legal and ethical business practices and to maintain evidence from all of its activities and to prevent also fraudulent activities. There is also collaboration with external and independent tax, accounting, auditing and legal advisors on any matter of operations and there is transparency in all of our business and other transactions.

The Company complies with applicable accounting principles and maintains a system of internal accounting controls that will provide reasonable assurance to management that all transactions are properly recorded.

Each employee involved to the finance must help maintain the integrity of The Company and is expected to be honest, objective and loyal in the performance of record keeping responsibilities. The use of “off-the-books” accounts to facilitate questionable or illegal payments is strictly forbidden. Every payment recorded is full, fair, accurate and according to the regulations and the Code. All records and books are maintained according to the regulations requirements, policies and procedures. If an employee believes that violation of the law has been committed he/she has to report it to the management and the Legal Advisor of the Company.

19. POLITICAL ACTIVITY

The Company supports the right of every employee to participate actively in the political and democratic process. However, employees must have approval from management before any activity made during work hours or on company property on behalf of any political party, candidate, committee or other election related person or organization. No company funds or other assets may be contributed directly or indirectly to any political party, political committee or candidate for public office unless permitted by law or the codes of conduct of the collaborating manufacturing companies and authorized by senior management.

20. CORPORATE RESPONSIBILITY

Within the Company, there is significant emphasis in Corporate Responsibility and endeavour to accompany values with actions and results. Both within the organization and in business conducts there is emphasis in respect for people, ethics, rules, environment and the quality of products and services.

Various philanthropic activities are undertaken by the Company and its personnel and support is provided in many ways to various institutions and social programs such as free products for the poor's in need, motivating the blood donation, protection of the environment, protection and promotion of the Greek civilization.

21. ENVIRONMENTAL POLICY AND PRACTICES

The Company is committed to engage in businesses by an environmental responsible manner and will strive to improve its performance to benefit its employees, customers, communities, shareholders, and the environment. All employees are responsible for making sure that business is conducted in compliance with all applicable laws and in a way that is protective of the environment.

The Company forbids smoking in the work environment for more than 25 years to aim the protection of employees' and visitors health and the creation of a pleasant work environment. The Company provides new technology cars that are environmental friendly and they are replaced regularly, developing a preventing attitude for peoples' health and protection of the environment.

Also, many of the products promoted have been awarded a Green Dot. The Company participates in recycle programs such as the packaging of products, of the Hellenic Recycling Company and participates in recycling of papers, batteries and recycling materials. The newly build owned building is bioclimatic, energy efficient and in accordance with building safety laws.

22. WORK ENVIRONMENT

The Company is committed to a productive, fair, discrimination free working environment. Key elements for developing such an environment include freedom from harassment in any form, equity, ethical behavior, team building, a culture that recognizes and appreciates the advantages of a diverse work force, and a decision process which seeks to ensure that all employees are treated with dignity, appreciation and respect.

Discrimination on the basis of gender, place of origin, age, religion disability, sexual preference, or marital status will not be allowed. This includes discrimination in hiring, training, advancement, compensation, discipline, and termination. The company encourages personal development and invests in the continuous education and growth of personnel through ad hoc seminars on the business, the company principles, its products, on sales and management skills, on the quality system, and other related initiatives.

The Company encourages its personnel to bring questions or concerns in this area to the management. The Company prohibits use of alcohol and drugs and expects from every employee to perform its work in a safe manner.

Psimitis respects freedom, individuality, dignity and the need for confidentiality and tact among employees. The Company only collects and retains personal information from employees that is required for the effective operation or as required by legislation and applicable laws for employment and keeps these records as strictly confidential and gives access to authorized personnel only who have a legitimated need to know.

All telephone and electronic communication systems, infrastructure and equipment of the Company are to be used for lawful purposes only and Psimitis keeps the right to monitor their proper use to ensure their compliance to the legislation, the rules and the Code.

In today's world the telecommunication means give the opportunity for fast and uncontrolled transmission inside and outside the Company. All employees of the Company in every mean of work-related communication and especially in the electronic communication should be sure that comply with the Code.

23. SAFETY AND HEALTH

The Company is committed to a safe, healthy work environment that is in compliance with all applicable laws and regulations. All employees are expected to develop a pro-active, cooperative attitude toward issues of health and safety throughout the Company.

24. CUSTOMER RELATIONSHIPS

Improper Payments

No bribes, kickbacks, or other payments for illegal purposes shall be made to or for the benefit of government employees or officials, customers, or other parties. The company and its employees should NOT in any case give any gift or money to customers and officials in exchange for a favorable Company treatment or product use.

This policy extends not only to direct payments, but also to indirect payments made in any form through consultants or other third parties. No benefit will be given to a customer with an explicit or implicit requirement to use or purchase the Company's marketed products. "Customer" is used throughout these policies to mean any person or entity that is in a position to purchase or influence a decision to purchase products.

Gifts

The giving of gifts is generally prohibited and exemptions can be made when they are modest in amount and which could in no way cause embarrassment or obligation. Should be according to company's business purposes and permitted by the law and

the codes and the ethics of the collaborating manufacturing companies. Should always have the purpose of the patient care or the improvement of training and research.

Promotional items

In the case they are not required for the fixation of sales, certain discounts, rebates, free products, demos, equipment loaners and warranty services furnished in the ordinary course of business are permitted. Such items should be of modest value and should have educational and medical, research and operational purpose and should be related to sales in any way.

The products are offered at reasonable prices and there is full implementation of national and international related legislation and the Code of conduct of the Chamber of Commerce.

The Company may provide educational items CD-ROMs or USDs as those items serve a genuine educational function or serve to benefit patients.

Donations

Donations should not be given for affecting the procurement and purchase of company products or in order to give financial benefits to any user.

Donations or borrowing of products to customers or organizations in order to support the use of products already bought by affiliated customers are permitted if and only if they shall entail a benefit to society and shall be made to promote better health care, social solidarity, demonstration of good corporate citizenship, or serve a genuine educational or research function.

The Company may make donations to charitable, medical or public organizations for charitable purposes such as research, medical education and seminar, patient education and public education, the improvement of services and new health care technologies for the patients' welfare and wellbeing.

Subscription to scientific issues and cover of expense relating to charitable organizations is permitted only if it is not related to the increase or influence of sales.

Business courtesies

Business courtesies such as meals, transportation, and entertainment provided to a customer must be modest in amount and must be related to a legitimate business purpose (e.g., explanation or demonstration of products, application of products, service capabilities, or training). They should be referred only specifically to the applicants (not any other person), and should not involve luxurious and unnecessary courtesies and actions. In case of training, most of the program should be relevant to training purposes, take place in appropriate places, at modest prices, and in no way cover expenses of relatives. Appropriate place for such meetings are central places, not in a 5* premises or exotic and extravagant destinations. National meetings should take place inside the country.

All expenses agreed to be shared with the manufacturer should be evaluated carefully and pre-decided, pre-approved and controlled. In all such cases, the Company applies all rules provided in the existing legislation regarding product sales, clinical research, advertisements etc.

Consulting

The Company may compensate experts for consulting, research and other services rendered and reasonable costs incurred where the services have value to The Company and are rendered for fair market value. Compensations accepted are the consulting services, clinical researches, honoraria, education, proctoring for proper product use and relevant medical activities in a reasonable cost. Such arrangements must be in writing and will be reported to the tax and other authorities and must comply with local Business Conduct Standards. The invitations of scientists and professional tutors should be in accordance to customer needs and fully appropriate to the required service.

Company promotional events

The Company has the responsibility to provide instruction, education, and training to health care providers for safe and effective use of products from the health care techniques in the use of products and the improvement. In this context it provides honoraria or reimbursement of travel, living, or meal expenses to participants, the amount of which must be reasonable. Such activities must take place at properly selected venues, preferably where the professional training takes place or in the Company premises and should not be in leisure and sports facilities.

Conferences

The Company may, under some circumstances, underwrite the cost of continuing education conferences or professional meetings (e.g., registration fees, travel, living, and meal expenses). Such payments may be directed to the sponsor of the event or the institution of the attendee or alternatively to the attendee. All such payments are declared to the tax and other authorities and those sponsored should have a relation to the event and must be carefully selected and the Company shall not pay for any relatives.

Grants

Grants for academic purposes are permitted and may include grant for conference organizer, grant to pay for conference cost, honoraria, travel, lodging and meals, all of which must not be excessive.

Audit

Any request, payment, grant or cover expenses for such activities should be placed in writing and has the approval of the Psimitis management, must comply with all legislations and local Business Conduct Standards and must be accurately reported to Psimitis financial book and records. Any requests received by employees should immediately be reported to the management who will provide with further instructions.

25. COMPLIANCE WITH BUSINESS STANDARDS

The present Code is in line with those of the multinational companies whose products Psimitis represents and distributes in Greece including MEDTRONIC, ST.JUDE MEDICAL (AGA), CR BARD and WL GORE. It is also in line with National and International related business associations, including: the European Association of

Medical Devices Manufactures, the Advanced Medical Technologies Association, the European Federation of Pharmaceutical Industries and Associations and the Hellenic Association of Scientific and Medical Equipment Suppliers

26. VISION

- To contribute towards improving the health and the quality of life of fellow citizens, by means of providing medical technologies and products distinguished by an outstanding degree of innovation, quality, safety, reliability and effectiveness.
- To be for customers and their patients, an unsurpassed leader and supreme benchmark of reliability, integrity, moral behavior, efficiency, customer dedication, customer satisfaction and change.
- To be for employees an unrivaled and remarkable organization characterized by an environment that fosters respect for people, security, care, team work, fun and opportunities for personal development, excellence, contribution and reward.

27. STRATEGY

- To supply health care professionals with new innovative, effective, qualitative, reliable and safe products, which enable them to improve considerably their abilities to prevent, diagnose, treat and rehabilitate cardiovascular and related diseases.
- To respond continuously efficiently, timely, reliably, and energetically to the requests of our customers in the various health care institutions and we excel, not to meet but, to surpass their needs and expectations.
- To emphasize and rely upon high expertise, state of the art knowledge, continuous training and improvement, modern management, fast adaptability and change, good relationships, nonstop 7-day/24-hour technical and sales support, reliability and always in accordance to the Code
- To take into consideration the safety of the patients and to provide an effective biotechno-vigilance system

28. GUIDING PRINCIPLES

The success and sustainability of any business depend to a large degree on the guiding principles that prevail upon its interactions with employees, customers and society in general.

- ***Respect for people and ethical values, integrity, transparency, responsibility, honesty, discreetness***

To succeed and to sustain a company should always put the health and quality of life benefit for patients over and above commercial objectives and every action

and strategy must contribute to their welfare and wellbeing. Furthermore, the business affairs between medical companies and physicians must be characterized by transparency, mutual respect, trust, moral behavior, independence and professionalism.

- ***Leadership, innovation, speed, quality, development, change, consistency, effectiveness, reliability, determination***

We believe that to be successful and to support effectively the physicians in fighting disease, pain and life loss, a company must be efficient in its organization, consistent, reliable and instant. Additionally, it should be unsatisfied and constantly in search of new ways and means to achieve better performance, to offer new novel products and to satisfy customer needs and requirements.

- ***Team spirit, collaboration, mutual respect, methodology, motivation, fairness, development, reward***

We believe that employees represent one of the most valuable assets for any company. They must operate within an environment featured by collaboration, team spirit, respect and fairness, where people feel useful, proud, effective, motivated, recognized and looked after. There must be, for everyone, an opportunity for development, for contribution and performance reward.

29. EMPLOYEE INFORMATION AND RESPONSIBILITY

Adherence to all laws and regulations and to the policies in this code as well as the business conduct standards, is a condition of employment for every of our employees. Employees are expected to know and follow the laws regulating the markets and the environments in which Psimitis does business and to comply with the provisions of the present Code and its standards.

The Company will inform any new hire about the Code and standards of business conducts and once a year will distribute it to all employees so that they sign and confirm that they have understood and comply with it. Management and supervisors are responsible to oversee the application of the code and they are expected to bring any violations to the attention of the Company.

Violations of the code and improper behavior that will damage and expose the company to the customers, the patients, the authorities and the community in general, may lead to disciplinary measures, including the termination of employment. A Code and Business Conduct Standards provides a framework to guide business conduct and it is not possible to cover every situation. Should employees have any enquiries they should address them to the senior management of The Company.