

BUSINESS CODE OF CONDUCT

The PharmaLinkage Code of Business Conduct (“**Code**”) outlines the principles and standards that we expect our registered users to follow when using our PharmaLinkage’s Platform. Our website www.PharmaLinkage.com, web & mobile Application “PharmaLinkage” is a platform that connects buyers, sellers, visitors, sponsors, contributors, professionals and colleagues of pharmaceutical products and services.

The Code provides information about our standards of integrity and explains our legal and ethical responsibilities.

Our mission is to provide a reliable, efficient, and ethical marketplace for the pharmaceutical industry. Our values are quality, safety, compliance, and trust.

We seek to operate a sustainable, long - term oriented business focused on quality, integrity and serving our customers, users, and communities. Our successful partnerships are based on close collaboration, trust, accountability and sharing the same values and goals and we want to work with buyers, sellers, manufacturers in the Pharmaceutical Industry who have the same view of success.

We seek to operate with partners who share the same commitment to treating their colleagues, their competition, and various users fairly, equally and with respect who practice ethical business and treat information uploaded by the user responsibly and above all, comply with all the applicable rules and regulations.

We seek that all the users and representatives are expected to comply with the Code, which is essential to maintaining our reputation for honesty, quality and integrity.

Section 1 - Scope of this Code

Our Code applies to all the users, buyers, sellers, manufacturers, agents, partners, and researchers engaged with us, either directly, indirectly or through an entity or by an authorized agent.

You are expected to follow the principles set out in this code and to communicate them to any individual or team engaged in the work with PharmaLinkage. This includes any employee or officer, consultant or sub - contractor and any agents engaged by you.

For any areas where there is discrepancy between the applicable law or their national laws and this Code, you must adhere to the Applicable domestic law stated in the Terms and Conditions to establish an appropriate course of action.

Where there are severe violations of any of the core principles, or where you are not willing to address the violations, or where the principles are repeatedly breached, we reserve the right to terminate the business relationship.

Section 2 - Ethical Business Practice

We expect our Users:

- i. treat other User(s) with respect and dignity;
- ii. to not threaten any other User(s) or resort to any form of harassment or inhumane treatment, including threats of violence, corporal punishment or any other form of physical, sexual, psychological or verbal coercion, harassment or abuse;
- iii. to not practice discrimination in their relationship with the other users, parties, or tolerate discrimination by their colleagues and workers against others, with regard to any legally - recognized personal characteristic or status, including race, color, ethnicity, national origin, citizenship, gender expression or identity, sex, sexual orientation, religion, age, marital or parental status, physical or mental disability;
- iv. to speak up, if you observe any unsafe behavior or safety hazards, and should report anything that you see causes concern, and contact local emergency services in the event of an immediate risk.

Section 3 - Commitment

We are committed to ensuring that our Platform and the Services provided on our Platform are operated free from modern slavery, and forced child labor.

You must not engage in, work with or subcontract to any third party that engages in the following practices:

- Use of forced, coerced or otherwise involuntary labor, whether by actual or threatened means;
- Use of any methods to prevent free movement of labor, such as withholding identity documents or debt bondage;
- Enabling or facilitation of human trafficking.

In addition, you agree that you must not engage in, work with, or subcontract to any user(s), or third party that engages in the use of child labor which:

- Impacts on their health, safety or development, or the legal requirement for education;
- Contravenes any other bilateral or other contractual agreement, where the child laws are more stringent;
- Contravenes any applicable local, or national laws or regulations

We have zero tolerance of bribery, regardless of location and business operation. It is expected that you, especially those who have subscribed and addressing, displaying,

transmitting, and marketing their services on our Platform, demonstrate the same commitment.

You must avoid requesting, offering or otherwise sharing gifts or entertainment which are in contravention to our Policies, either with the colleagues, employees, directors, managers of PharmaLinkage, or with other users present on our Platform, or with others when acting on behalf of PharmaLinkage. You acknowledge and agree that if you wish to share gifts or entertainment with the other users, public or government officials must do it at their own volition and PharmaLinkage shall not be held responsible or liable for the same.

We expect our Users to:

- conduct all their business in an honest, transparent and neutral way and avoid even the appearances of bias or self - interest;
- post accurate and complete information about their products and services on our Platform;
- comply with all the applicable and competition laws and regulations that govern the purchase and supply of the pharmaceutical products and services;
- respect the intellectual property rights of others and not post or use any content that infringes on those rights;
- avoid any conflicts of interest or unfair trade practices that may harm other users on our Platform;
- avoid engaging in trade with corporates, entities and persons having trade sanctions and restrictions, under the applicable laws and regulations;
- enter into agreements with any User(s) to divide, control or otherwise illegally manipulate a marketplace to their benefit;
- to not share any confidential or commercially sensitive information they may have acquired through our competitors;
- report any misconduct or violations of this code of conduct or our terms and conditions to us;
- to take a responsible and ethical approach to tax matters and abide by all the applicable tax laws;
- to be honest in your dealings with other Users, and third - party that you engage with as part of your work on our Platform, never knowingly providing false information;
- to cooperate with us in any investigation or resolution of any issues or disputes that may arise from using our Platform.

We do not tolerate any actions or behaviors that violate this code of conduct, such as:

- Posting false, misleading, or fraudulent information on our Platform;
- Posting content that is illegal, harmful, offensive, abusive, defamatory, obscene, pornographic, hateful, racist, sexist or otherwise objectionable;
- Posting content that promotes or advertises any products or services without our prior written consent;
- Posting content that solicits personal information from other users or sends unsolicited messages or spam;
- Posting content that encourages or incites violence, illegal activity, or terrorism;
- Posting content that interferes with the operation or security of our Platform or any other website or service;
- Using our Platform for any lawful or unauthorized purposes.

Section 4 - Integrity, Security, Privacy and Personal Data

Integrity means being honest, ethical, and trustworthy in your dealings with other User(s) and with us. You agree to post accurate and complete information about your products and services on our Platform and not to engage in any fraudulent, misleading, or deceptive practices.

Security means protecting your account, password, and payment details from unauthorized access, use, or disclosure. You agree to use a strong password for your account and not to share it with anyone else. You agree that we have no liability or responsibility for any unauthorized access, use, or disclosure of your personal and sensitive confidential information if your password is leaked.

Privacy means respecting the personal information of other users and of yourself, and not sharing or disclosing it without consent or legal basis. You agree to comply with our Privacy Policy that explains how we collect, use, share, and protect personal data on our Platform, and how you can manage your privacy preferences and rights.

Personal data means any information that can identify or relate to a natural person, such as name, email address, phone number, etc. You agree to respect the personal data of other users and not to post or use any content that infringes the rights of others, such as their intellectual property rights, privacy rights, or other rights.

We expect our Users:

- when given use of or access to our Platform and the services, must adhere to the Agreement that is provided and designed to safeguard our Platform;
- to maintain appropriate information, security protocols and have policies, procedures and systems in place while accessing our Platform. We will not be

responsible and liable to any person, user(s), visitors, or any third party for any requirements, policies, procedures and systems which are not in line to that of the requirements of our Platform;

- must handle all the personal information and sensitive personal information responsibly and in compliance with all the applicable data protection, competition law and privacy laws;
- must handle any personal and sensitive confidential information provided to you by us, or by any other User(s), or by subscribing to any of our Services and the same should only be used in accordance with the applicable local privacy and data protection laws;
- to support our due diligence process and have sufficient guarantees in place to demonstrate that you have implemented appropriate data policies, and processes, as required under the law;
- to immediately notify us about any actual or suspected security breach, unauthorized disclosure or loss of any confidential, proprietary or personally identifiable information, whether involving any User(s), our system or data;
- to ensure that all the confidential, personal and proprietary information uploaded on our Platform by us, or other User(s), third party or any other visitors is handled and protected appropriately and used only for its designated business purpose, including information on business affairs, customer information, colleague data, trade secrets, product information and intellectual property, including the intellectual property of third parties;
- to ensure that the confidential and proprietary information should not be shared further without explicit authorization, and the said information should never be made use of, or disclosed, for commercial and private benefit.

Section 6 - Sustainability

We are committed to conducting our business in accordance with the principle of sustainable development and adhering to internationally recognized standards for environmental, social, and governance (ESG) performance. Sustainability is important to us because it reflects our mission and values, meets the expectations of our stakeholders, enhances our reputation and competitiveness, and contributes to the global goals for sustainable development.

We implement sustainability on our Platform by following best practices for reducing our environmental impact, ensuring the health and safety of our employees and users, respecting the human rights and labor rights of all the parties involved in our business, promoting responsible corporate governance and ethical conduct, and engaging with our local communities and other stakeholders.

We expect our users to:

- Use our Platform in an environmentally responsible manner;

- Comply with all the applicable laws and regulations that govern the purchase and supply of the pharmaceutical products and services;
- Respect the intellectual property rights of others and not post or use any content that infringes on those rights;
- Avoid any conflicts of interest or unfair practices that may harm other users on our Platform;
- Communicate professionally and courteously with other user(s) and with us;
- Report any misconduct or violations of this Code to us;
- Cooperate with us in any investigation or resolution of any issues or disputes that may arise from using our platform;
- Comply with all the applicable local, global environmental laws and regulations.

By continuing to access and use the Platform after accepting the Business Code of Conduct, you agree to the use of our Code as described in this policy.