

Code of Ethics and Business Conduct



At PuraCap, we are responsible for understanding our business, its legal and ethical requirements, and conducting ourselves with integrity at all times. We are committed to doing business with the highest degree of ethics, integrity, and compliance with laws worldwide. We believe our conduct matters; our values tell the story of who we are and our integrity is key to the respect and trust of the people we serve.

PuraCap's Code of Ethics and Business Conduct provides all employees with the policies that govern our global business and the tools necessary to make sound business decisions. The Code is an extension of our values and principles and it is the foundation of long-term success.

I ask that you read and follow the Code at all times and do not hesitate to seek advice, raise any concern or report anything you may feel is not right with your manager or through the other channels available to you. Our open door and anti-retaliation policies are in place to protect you.

In summary, our Code of Ethics and Business Conduct describes our Company's expectations of every employee. Thank you for living and incorporating the values and principles into your daily duties.

A handwritten signature in blue ink, appearing to read "Dahay", written on a light-colored background.

We are Principle-Centered

Our values tell the story of who we are, why we exist, what we expect from our employees, and how we treat them.

We Exist for our Patients

Our focus is on our patients to improve their lives through superior quality products. Our commitment is to ensure that all we do; from Research and Development through the manufacturing, packaging and delivery of our products, is done right always. Quality is the cornerstone of our existence and as such we continuously pursue improvements in our processes. Our integrity is never compromised and our patient needs are always first.

We Behave Ethically

Our behaviors align with PuraCap's corporate values. Our leaders throughout the organization are role models of excellence, quality, and ethical standards. Our employees model these traits in all they do.

We Expect Employees to Speak Up

Our employees are responsible to share through the proper channels any concern that requires corrective action. We are committed to maintaining an environment of accountability and inclusion. Employees can say what they know or suspect without fear of adverse actions towards them in their employment or working conditions.

We Value Diversity

Our continuous success is centered on our people. We embrace diversity to the fullest. Integrity and quality focus in everything we do are woven into the very fabric of our collective thoughts and actions.

We are Transparent

We embody honesty and open communication with our employees, business partners, customers and the communities where we operate. We take ownership for the actions we take as these are aligned with our values.

Our Code of Ethics and Business Conduct

Moral and Ethical Behavior

Adherence *always* to our moral and ethical standards is the centerpiece of our shared responsibility. It is integrity in action. To act with integrity means that:

- We are honest in everything we do,
- We subscribe to the Company's Code of Ethics and Business Conduct and our policies and practices in our daily work activities, and
- We pursue counsel when faced with situations that may have the potential of breaching our ethical standards.

Why Our Code of Ethics and Business Conduct?

Our Code is the foundation of our continual business success. Our pharmaceutical industry is a highly regulated and competitive environment. The Code provides the guidance to always do what is ethically right, to abide by the many laws that regulate our industry and to follow the policies and practices in our everyday activities.

Scope

Our Code sets the framework for compliance at PuraCap and establishes who we are as a Company. We ensure our business partners, customers and patients that we conduct our business ethically at all times. Our Code establishes the framework for success. The content is not intended to be comprehensive but is complemented with all company policies and practices, and all legal responsibilities that apply to your role in PuraCap. It provides the guidance to help you resolve any day-to-day matters that can have ethical and/or legal implications.

The Code of Ethics and Business Conduct applies to you as an important member of our team of employees.

What Should I Do?

It is important to speak up and raise your concern. This includes any violations or suspicion of a violation of our Code, company policies, procedures, and the law. If you're asked to commit or are aware of an illegal or unethical act, you are required to share it promptly. Our company is committed to listening and will take any concern seriously. Your concern will be investigated expeditiously. Any concern must be raised in "good faith," which means coming forward with a suspicion you believe to be true, even if it is later determined that no wrongdoing occurred. You will not be the subject of any form of retaliation for speaking up, asking questions, or participating in an investigation in good faith.

Would I be subjected to Retaliation?

It is strictly prohibited any form of retaliation for any employee who, in good faith, brings forth any concern or reports any wrongdoing. Retaliation is also prohibited if you provide information in an investigation being conducted. "Good faith," means reporting suspicious behavior or acts that are believed to be true, even if it is later determined that no transgression occurred. Should a complaint result frivolous and malicious, any employee who makes such a complaint will be subject to disciplinary action.

How Do I Speak Up?

There are numerous ways in which you can raise a concern. The following options are available to you:

- Your manager or another senior manager, and
- Your Human Resources Department, or
- Anonymously through the Ethics and Compliance Hotline

Our Ethics and Compliance Hotline is staffed by a third party and available 24/7 throughout the entire year. Simply visit www.lighthouse-services.com/puracap or call:

- English speaking USA and Canada: 866-380-0007 (not available from Mexico)
- Spanish speaking North America: 800-216-1288 (from Mexico user must dial 001-800-681-5340)
- E-mail: reports@lighthouse-services.com (must include company name with report)
- Fax: 215-689-3885 (must include company name with report)

My Pledge Statement

All employees of PuraCap will receive, acknowledge and pledge to abide by the Code of Ethics and Business Conduct. From time to time the Code can be amended. Employees will be informed and requested to update their pledge accordingly.

Confidentiality

PuraCap will do its best to maintain your confidentiality to the extent permitted by law. We are also committed to no form of retaliation when a concern has been raised in good faith. If someone retaliates against you, he/she will be subject to disciplinary action up to and including termination of employment.

Our Workplace

Open Door Policy

PuraCap promotes an open door policy consistent with our belief that every employee must have access to management to openly communicate any concern, offer ideas and recommendations, and find solutions to any prevailing situation. This means, literally, that every manager's door is open to every employee. The purpose of our open door policy is to encourage open communication, feedback, and discussion about any matter of importance to you. Our open door policy means that employees are free to talk with any manager at any time about any topic.

If any area of your work is causing you concern, you have the responsibility to address your concern with a manager. Whether you have a problem, a complaint, a suggestion, or an observation, your company managers want to hear from you. By listening to you, the company is able to improve, to address complaints, and to foster employee understanding of the rationale for practices, processes, and decisions.

Most problems can and should be solved in discussion with your immediate supervisor; this is encouraged as your first effort to solve a problem. But, an open door policy means that you may also discuss your issues and concerns with the next levels of management and/or Human Resources staff members.

Diversity and Non-Discrimination

We value diversity and inclusiveness in all its forms, promote and welcome the uniqueness of every individual and their differing views and opinions. We treat each other with dignity, respect and acceptance in our day-to-day dealings.

We do not discriminate in any way including, but not limited to gender identity or expression, national origin, citizenship status, age, religion, physical appearance, sexual orientation or preference, marital status, pregnancy, childbirth or related medical condition, health status, genetic information, disability, political affiliation, military service, veteran status, or union membership or any other status protected under national and local laws.

Equal Employment Opportunities

PuraCap provides equal employment opportunities to all qualified applicants and employees, without regard to any of the personal characteristics expressed above. Any employee decisions are based on individual merit such as hiring, promotion and termination processes. Individual merit includes qualifications and job performance.

Workplace Harassment and Violence

No employee should be subject to any form of workplace harassment, hostile environment or violence. PuraCap is committed to ensuring a working climate of the highest professional behavior by all employees. It is strictly prohibited any unwelcome conduct of a verbal, non-verbal or physical nature. Harassment, such as intimidation, threats and bullying is strictly prohibited and can lead to actions up to and including termination of employment. Workplace violence of any kind will not be tolerated. Employees are urged to inform any such acts through the appropriate channels established in the Code. If you witness or experience any acts of violence, threats, intimidation or bullying, report it immediately to Human Resources.

Workplace Security and Safety

PuraCap is committed to protecting the health and safety of our employees at all times. For this purpose, dedicated resources specialized in Environmental, Health and Safety closely monitor the work areas and its surroundings to identify and correct anything that can be a risk to the safety and welfare of our employees. Employees are provided with the proper personal protective equipment to ensure their safety and unwanted exposure. We monitor and report immediately any environmental, health and safety incident. We investigate all incidences to identify the root cause and establish the appropriate corrective actions. Educational trainings are conducted

periodically to all employees to instill the need to work safely and avoid the risk of injuries or accidents in the workplace. Safety is everyone's responsibility—we should all speak up about unsafe conditions or activities and ensure they are reported appropriately.

Substance and Alcohol Use and Abuse

We are responsible to our employees and the public to deliver exceptional services and quality products. To do so, we are committed to ensuring a workplace free of substance and alcohol use and abuse. The use of drugs or alcohol in the workplace is inconsistent with the behavior expected of employees. Its use in the workplace is against the rules and is strictly prohibited.

The use of substances can impair our ability to work safely and efficiently. The use of alcohol, controlled substances or illegal drugs, and medications can affect our decision making and focus. Any medical situation you may have should be discussed with Human Resources.

It is your responsibility to report any violation or suspicion of a violation to this policy.

Our Communities

The Environment

We strive to minimize our environmental footprint for the good of the communities where we operate and we adhere to all environmental laws and regulations. We closely monitor and reduce the discharge of hazardous substances within applicable levels. We also immediately report all incidences as required by applicable laws.

Employee Involvement

PuraCap encourages its employees to actively engage in the community through social, cultural, sports and political activities. However, it is our policy to ensure this involvement is strictly on an individual and private basis. Employees cannot however, engage in these activities on Company time or use Company property for these purposes.

Inquiries, Audits and Investigations

We comply and cooperate with any external probe in the form of inquiries, audits and investigations with transparency and accountability. Upon any request received, we will provide swiftly the required information to which they are entitled to. Any inquiries by external parties must be informed immediately to the appropriate company official assigned to your operation.

Employees must act ethically at all times which means that we must never alter, hide or destroy company records or documents at any time. When requested to, employees must answer all questions honestly. No employee must induce, pressure or suggest to anyone to hide, destroy or alter any information or provide misleading information. PuraCap will never retaliate against you for cooperating in an investigation or in external hearings and proceedings.

Our Products and its Safety

We pursue excellence in our manufacturing, research and development, marketing and distribution activities.

Quality and Compliance

Product quality and compliance is first and foremost as we are committed to ensuring the efficacy of our products to the people we serve. To ensure public health, our products must always meet the highest level of safety and effectiveness by way of identification, quality, strength, purity, labeling and packaging. This is achieved through facilities optimization and operation, proper controls in our processes and following strict Current Good Manufacturing Practices or CGMP.

You are responsible for ensuring that you perform your responsibilities in a manner that guarantees quality and compliance at all times. You are responsible for notifying any issue regarding our products or processes that can affect the quality, safety and integrity of our products.

Product Complaints

PuraCap takes any complaint regarding our products very seriously and will investigate it promptly and thoroughly. If you are made aware of any complaint, immediately inform your organization's Quality management.

Research and Development

PuraCap is committed to performing research ethically to develop and advance high-quality products that address the medical needs of patients.

Non-Clinical Research

We conduct non-clinical research in accordance with applicable laws, regulations and internationally recognized standards, including Good Laboratory Practices.

Business Partners

PuraCap develops business partnerships with suppliers and wholesalers who share in our commitment to conduct business with honesty and integrity.

What is Expected of You

Always follow the established procurement policies and procedures to ensure a fair, consistent and transparent process. Review thoroughly the qualifications of potential partners based on key criteria. Quality, transparency, reputation and reliance, in addition to price is part of the selection criteria and appropriate due diligence.

Treat business partners with respect and integrity at all times. Negotiate in good faith and honor agreements made with them.

Gifts and Business Entertainment

We are committed to treating with transparency and impartially all people and organizations with which we come into contact or conduct business. Employees practice and demonstrate equal treatment, unbiased professionalism, and non-discriminatory actions in relation to all vendors, suppliers, customers, employees, potential employees, potential vendors or suppliers, and any other individual or organization.

The exchange of gifts or entertainment in some parts of the world may be acceptable as part of establishing good business relationships. However, this has the potential to creating an appearance of conflict of interest although there may not be one. When posed with a situation of this nature, we must follow the highest ethical standards by seeking advice with management before accepting or giving gifts. It is not appropriate to request any form of benefit for ourselves, family or friends from any supplier at any time. These expectations should be adhered to at all times.

Free Competition

PuraCap supports fair and honest competition in the marketplace. We believe that the quality of our products, our service to our customers and fair pricing practices provide the basis of our competitive edge. We fully comply with all antitrust and competition laws wherever we do business around the world.

Practices that are strictly prohibited are making false statements about or undermining the credibility of our competition. We can however objectively compare with them through the use of accurate data obtained through ethical and lawful means to demonstrate how our products and service can provide greater value to our customers.

Bribery and Anti-Corruption

PuraCap from competes for private business opportunities and government contracts. As such, be it government or private business, we do not tolerate any attempt of improper payments to anyone as a basis to advance our interests in securing a contract. We abide by all applicable anti-corruption laws in the countries we do business. We also abide by all trade laws that regulate imports and exports of our products.

We are committed to the highest standards of ethics and integrity in the conduct of its business. Our aim is to do the right thing at all times. PuraCap has no tolerance for Bribery or Corruption of any kind, whether of a government official or private individual. It is illegal and inconsistent with our values. PuraCap prohibits any individual from offering the payment of money or anything of value to any official for the purpose of influencing any official act or decision. Everyone working for or with PuraCap is responsible for ensuring that its business is conducted without engaging in Bribery or Corruption in any form.

PuraCap and its employees must be in compliance with the provisions of the US Foreign Corrupt Practices Act (FCPA) which specifically prohibits making any offer, promise, or gift of any value to an employee, agent or official of a federal government (foreign or domestic) to secure any concession, contract or favorable treatment.

The anti-bribery provisions cover PuraCap and individuals and foreign subsidiaries of PuraCap. These entities are barred from offering to foreign officials money or anything of value, which is defined broadly to include stock, entertainment, gifts, discounts on products or services,

charitable donations, offers of employment, assumptions of debt, payment of travel expenses and personal favors.

PuraCap and individuals and foreign subsidiaries of PuraCap are barred from accepting money or anything of value for the purpose of influencing any official act or decision by position authority, which is defined broadly to include stock, entertainment, gifts, discounts on products or services, charitable donations, offers of employment, assumptions of debt, payment of travel expenses and personal favors, no matter if “active” or “passive”.

Consequences of Non-compliance

Any violation of this Policy will be treated extremely seriously and may result in disciplinary action up to and including termination of employment and/or termination of contract. You may also be liable and civilly or criminal prosecuted.

Any person who knows or suspects a potential violation of this Policy should immediately report it to their line manager, the Human Resources department or anonymously through the Ethics and Compliance Hotline.

Illustrations

The following explanation and examples will help you to better understand this policy. Bribery can be “active” or “passive”. The Company prohibits any person or team acting on its behalf from engaging in either form. Active bribery is the act of bribing another person. Examples of active bribery can include:

- Provision of gifts or entertainment to anyone in a position to make decisions that are intended to or appear to be intended to influence the actions of that individual, even if it is local practice or customary to do so, and
- Payment of so-called “facilitation” or “grease” payments to government officials to influence routine governmental actions – such as paying money to speed up processing of a visa.

Passive bribery is the act of being bribed. Examples of passive bribery can include:

- Accepting gifts or hospitality from a supplier in return for promising that they will be given an upcoming contract, and
- Accepting a gift, payment or other form of ‘kickback’ from an agent, distributor in exchange for directing business towards them.

A bribe can represent anything of value, and does not need to be a payment of cash. Giving or receiving the following could constitute bribery, depending on the context and applicable bribery laws:

- Gifts of any kind unless they are permitted by the Applicable Codes and applicable Bribery Laws
- Lavish or disproportionate gifts or entertainment
- Offers of employment being extended to a friend or family member
- Donations or sponsorship
- Payment of travel expenses or accommodation for a HCP for government official when there is otherwise no legitimate business purpose; or
- Use of the Company’s assets or equipment for activities unrelated to its business.

Offering or requesting a Bribe is an illegal act – even if the transaction never takes place. Accordingly, the Company prohibits either offering to pay, or requesting the payment of bribes, regardless of whether any value exchange ever takes place.

Bribes can be paid and received through third parties working on behalf of the Company—payment does not need to be routed through employees. The Company is legally responsible for any acts of bribery committed by any person acting on its behalf (“Associated Persons”). Accordingly, the Company prohibits bribery by Associated Persons.

Corruption comes in many forms. It includes bribery but also other behavior which its purpose is illicit or immoral. PuraCap prohibits any person who is acting on its behalf from engaging in corruption, in any form.

Conflict of Interest

All business decisions by PuraCap employees must meet the best interest of the Company. A conflict of interest exists when personal gain or that of a close associate (people or company) is part of the decision making. Good judgment should be exercised always when making business decisions on behalf of PuraCap. This means that even the mere appearance of a conflict of interest must be avoided. Doing business with a company where you or immediate family members have a substantial interest in is strictly prohibited. These situations have the potential of impairing good judgment and must be avoided at all times.

You are required to notify and report of any actual or potential conflict of interest. Notice should be in writing and directed to your immediate manager. Approval must be sought and obtained before engaging in any business activity where a conflict of interest or an appearance of a conflict of interest may exist.

Timely and Accurate Recordkeeping

Our business decisions rely on the accuracy and integrity of the financial and other business records we have. Every employee is responsible for ensuring that all records he/she produces are complete and accurate. PuraCap's financial function and its employees are expected to comply with generally accepted accounting principles at all times. Maintaining our books and records accurate, complete and current is critical for making important business decisions. Also, all filings with government agencies must include accurate and complete information.

PuraCap must maintain an accurate record of all business transactions. These records are essential to managing our business and fulfilling our legal and ethical obligations to governments and our customers.

What are Business Records?

A "Business Record" is all recorded information in paper or electronic form, generated or captured, that must be retained for business, operational, legal, regulatory, and/or historical purposes.

Records Retention and Legal Holds

PuraCap retains records and manages its documents appropriately to ensure the integrity of our information. We comply with existing company policies and applicable laws to ensure that our records are complete, accurate and accessible.

No director, officer or employee of PuraCap shall destroy, dispose of, conceal, or alter any record or document while knowing that it is or may be relevant to an anticipated or ongoing investigation or legal proceeding conducted by or before a federal, state or local government agency, including tax and regulatory agencies, law enforcement agencies, and civil and criminal courts, or an anticipated or ongoing internal investigation, audit or review conducted by PuraCap.

Speak out to Fraud

If you become aware of a questionable accounting or record-keeping practice, you must report the concern promptly to your immediate manager, to a member of the Executive Team or the designated Ethics and Compliance Officer.

Handling Information, Property and Communication

Proprietary and Confidential Information

PuraCap's operational and business information must be protected for its continued success. Everything we do and document daily is considered important and proprietary. This includes, but is not limited to, sales forecast and pricing information, marketing strategies, customer information, manufacturing processes and techniques and business and product development activities.

Every employee is responsible for maintaining the integrity of PuraCap's proprietary and confidential information. We are responsible for ensuring we prevent unauthorized access or dissemination of any information.

The following are general guidelines that employees should practice to protect the company:

- Use appropriate and secure electronic means while storing and sharing and disposing of information,
- Avoid conversations of a confidential nature in public places in or outside the company premises,

- Learn to identify “phishing” techniques that are usually in the form of telephone or email inquiring for information and avoid being tricked into providing such information,
- Ensure you obtain confidentiality agreements before conducting any business with third party providers and don’t provide confidential or proprietary information to these,
- Maintain any confidential or proprietary information secured when working in an open area, and
- Maintain the strict confidentiality of PuraCap information at all times;

Use of Company Property

PuraCap’s company assets are valuable and must be protected. Company assets such as equipment, facilities, and documents should be used for authorized activities. We are all responsible to protect these assets from loss, damage, theft, and misuse. Any lost, damaged, or stolen assets should be reported immediately to your manager.

Company Technology

We each have a responsibility to use our company’s network, computer, and communications systems ethically and legally. In general, occasional personal use of these systems is permitted and its use should be appropriate without affecting your job duties. As per applicable regulations, we may monitor its use.

Use of company systems cannot be used to facilitate illegal or illicit activities. Communications between employees on electronic systems should be conducted professionally. Although our IT resources are responsible for ensuring the safest virtual environment through its systems and applications, you are responsible for making proper use of the equipment and following the rules for storing, generating, sending and retrieving information.

Social Media

PuraCap recognizes our employee’s right to participate in online social media and supports the collective sharing of ideas, opinions and perspectives through these means. However, it is incumbent on every employee participating in these to conduct themselves responsibly at all times. As a general rule, employees are not authorized to engage in any web-based social media or elsewhere on behalf of PuraCap. This applies to all social networking sites as well as blogs, photo and video sharing sites.

The use of the company logo or trademarks, any product or company information is prohibited without permission from PuraCap management. Unless pre-authorized by a company official, we cannot speak on

behalf of the Company. Any questions, comments or feedback in the media about PuraCap must be deferred to the proper internal channels within the company.

The Media and the Public at Large

Only the members of the executive management and local Senior Leadership designees are authorized to address any inquiry made by reporters and media representatives.

If you receive questions from the media, the general public or other external organizations, indicate that you do not speak for PuraCap. Additionally, alert your department's director or vice president of the request.

Respect for Privacy and Protecting Personal Information

PuraCap is committed to protecting the confidential information of employees and third parties with which we do business with. During the course of employment, employee personal information is provided to us or generated from within the company and is retained in our personnel files. This information can include employment history, salary and performance reviews, government-issued identification numbers, contact information, civil status and information about family members, health and medical history which may include disability claims and conditions.

We are committed to protecting this information at all times and in accordance with federal and state laws and regulations.

If within your job duties, you are responsible for handling any personal information about your coworkers, you must take special care to safeguard it at all times. This information can only be used for official purposes and should not be shared outside the company unless a written authorization is provided by the information's owner is secured.

APPENDIX

U.S. Specific Laws and Industry Codes:

Anti-Kickback Laws (Federal and State)

The federal Anti-Kickback Statute and similar state laws prohibit payments, in any form, intended to reward past prescribing or to induce someone to purchase, prescribe or recommend a product that is reimbursable under a U.S. federal healthcare program. Exceptions, called Safe Harbors, are provided for discounts and certain other arrangements, if specific requirements are met.

Exclusion of individuals from U.S. healthcare programs

The U.S. government has the authority to exclude individuals and entities who have engaged in fraud or abuse from participating in Medicare, Medicaid or other healthcare programs or to receive federal contracts or assistance pursuant to sections 1128 and 1156 of the Social Security Act. As a result we need to check the U.S. employees and contractors of PuraCap against the List of Excluded Individuals and Entities (LEIE). This list is maintained by the Office of Inspector General (OIG) in the U.S., and includes persons who have been excluded, debarred, or suspended (“ineligible individuals”) from U.S. government health care programs such as Medicare and Medicaid. If we employ such individuals, we ourselves could be liable to civil penalties.

Food and Drug Administration (FDA) Restrictions on Promotion

The FDA regulates the labeling and advertising of PuraCap products in the United States. A product's labeling includes all information on the drug package, the prescribing information, and any other written, printed, or graphic materials provided by PuraCap about the product. All materials used to promote PuraCap products, such as advertisements, brochures, and detail aids, must be consistent with the approved labeling. Promotional materials that are false, lacking fair balance, or otherwise misleading violate FDA rules.

Food, Drug and Cosmetic Act (FDCA)

The ultimate purpose of the Federal Food, Drug, and Cosmetic Act (FDCA) is to protect consumer health. Under the FDCA, the Food and Drug Administration (FDA) regulates several areas of prescription drug development and marketing, including clinical studies, manufacturing, market approval, safety and efficacy, and advertising and promotion.

Physician Payment Sunshine Act

The Physician Payment Sunshine Provisions of H.R. 3590 § 6002 were signed as federal law as part of the Patient Protection and Affordable Care Act (PPACA). The law requires pharmaceutical manufacturers to annually report and publicly disclose to the Open Payment Program, via the Centers for Medicare and Medicaid Services (CMS), payments and other transfers of value provided to US physicians and teaching hospitals.

The Federal False Claims Act (FCA) and State False Claims Laws

The federal FCA and similar state laws make it a crime to deliberately submit a false claim for reimbursement to the US government or do anything to cause, assist or encourage customers to submit false claims to these programs. Pharmaceutical sales and marketing activities that might violate the federal FCA include (but are not limited to) submitting false claims for government payment, fraudulently reporting false pricing information to government agencies and similar activities.

The Foreign Corrupt Practices Act (FCPA)

The FCPA prohibits corrupt payments to foreign officials for the purpose of obtaining or keeping business.

The Office of Inspector General (OIG) Compliance Program Guidance for Pharmaceutical Manufacturers

These are guidelines provided by the Office of Inspector General (OIG) of the Department of Health and Human Services (DHHS) for pharmaceutical manufacturers to consider when developing, implementing, or evaluating a compliance program. The guidance is intended to assist with the development and implementation of internal controls and procedures that promote adherence to applicable statutes, regulations, and requirements of the federal healthcare programs.

State Marketing and Advertising Laws

Several states (including CA, DC, MN, NV, VT, MA, WV) have enacted laws that require pharmaceutical manufacturers to annually disclose, to state regulatory bodies, either a declaration of the compliance program and/or marketing costs and financial expenditures to physicians, purchasers, and dispensers of prescription drugs. This information often includes the value, nature, and purpose of the payment.

U.S. Specific Laws and Industry Codes

PuraCap Code of Ethics and Business Conduct

This summary is intended to be a guide to some country-specific laws, regulations and industry codes that relate to this Code of Ethics and Business Conduct. This list is not exhaustive, and lists only those laws, regulations and codes that apply where most PuraCap business is conducted. Where laws are stricter than this Code of Conduct, those laws must be followed. There are other country-specific laws outside the regions listed above.

MY PLEDGE STATEMENT

I acknowledge that I have read and understood the information within the PuraCap Code of Ethics and Business Conduct.

I pledge to comply with these principles in all my daily work activities.

Employee Name (print clearly): _____

Department/Function: _____

Employee Signature: _____

Date (DD-MMM-YYYY): _____

Instructions: Please complete, remove this page, and return to the Human Resources Department.