



**Ethics and Compliance  
Program**  
2024





- *We foster a culture that promotes continuous improvement in the execution of our Ethics and Compliance program.*
- *Company policies in addition to a set of internal controls promote adherence to U.S. laws, regulations, and industry code and guidance with respect to the development, manufacturing, marketing, and selling of approved Acrotech Biopharma products.*

# Ethics and Compliance Program

- *We will use all lawful and ethical means possible to bring our therapy options to the right patients, in the right way.*
- *We will be personally responsible to understand and adhere to the letter and spirit of all laws and company policies that pertain to our daily business.*
- *We will partner only with healthcare professionals, suppliers and other business partners who share our commitment to understand and uphold the laws and regulations that apply to our operations.*
- *We will respect and protect the dignity and privacy of patients, healthcare professionals and their staff, business partners, competitors and our fellow employees.*
- *We will promptly and cooperatively report without fear of retaliation any behavior contrary to these principles to leadership, Ethics and Compliance Department, or the Helpline.*



- **Code of Business Conduct and Ethics**

*The program is built on strong ethical principles and values which reflect our commitment to conducting business with honesty, fairness and integrity while avoiding anything that may be perceived as improper activity.*

- **Policies and Procedures**

*U.S. laws, regulations, and industry guidance, in addition to Company expectations, are documented and operationalized to ensure employees' clear understanding of requirements. All employees are required to read, acknowledge, and follow all policies and procedures applicable to their roles and responsibilities.*



# Training and Education

- *Acrotech is committed to developing and implementing regular, effective, ongoing education and training programs.*
- *We believe this enables individuals to recognize their obligations to comply with Company policies and procedures and identify opportunities to mitigate potential risk.*
- *Programs are tailored to an individual's role within the organization.*





- **The Compliance Department**

*Manages the creation, development, implementation, operation, monitoring, and enforcement of the company's Ethics and Program.*

- **Funding and Research Support Requests**

*Internal review committees review and approve funding or research support requests from external organizations against a series of guidelines and procedures.*



- **Auditing and Monitoring**

*Compliance auditing is a retrospective assessment of business activities within a certain timeframe to determine if transactions and behaviors were consistent with company policies and procedures.*

*Compliance monitoring is an observation of real time activities.*

*Acrotech proactively conducts audits and monitors business processes to mitigate risk and support continuous improvement of the program and in accordance with industry practice.*

*Relevant findings are addressed and incorporated into existing or new policies or procedures and training to elevate the compliance program.*



# Compliance Program Investigations

- *The company investigates identified instances of potential non-compliance or misconduct in a fair and reasonable manner; including prompt and proper response to detected offenses, such as the initiation of appropriate corrective action to a root cause.*
- *At Acrotech Biopharma, the facts and circumstances of each, specific situation undergo a thorough review and potential violations are addressed in an appropriate manner.*





- **Due Diligence and Self Disclosure**

*Acrotech Biopharma proactively screens candidates for employment or service providers for exclusion, debarment or any other ineligibility in U.S. federal healthcare programs or government contracts.*

*All employees and contracted external parties have a duty to self-disclose any information that might preclude their involvement in Acrotech's business operations.*

- **Enforcement Action**

*Acrotech prohibits violations of law and company policies or procedures conducted in a knowingly and willful manner.*

*The company determines consequences of egregious behavior in a fair and timely manner.*



To learn more, contact:

TERRI LEDVA, Director of Ethics & Compliance



TLedva@aurobindousa.com

To ask a question or report a suspected violation anonymously and without fear of reprisal, contact



Helpline: 844-744-9516  
(calls can be made anonymously)



Website: [Helpline](#)