



AAA BUSINESS PARTNER CODE OF CONDUCT

Integrity is at the core of AAA's corporate values. Conducting business with integrity helps us earn the trust and respect of the people we interact with.

AAA aims to apply and abide by the highest ethical, social and environmental standards in all business activities. Accordingly, AAA strives to partner with individuals and organizations who share our commitment to these standards and operate their businesses in a responsible and ethical manner. To reinforce the standards to which we are committed, AAA developed this Business Partner Code of Conduct founded upon the Pharmaceutical Supply Chain Initiative's (PSCI) Pharmaceutical Industry Principles (the "Principles"), Association of Imaging Producers & Equipment Business Partners Code of Conduct and our internal AAA Employee Code of Conduct.

The AAA Code of Conduct is available at <http://www.adacap.com/company/code-of-conduct>. An explanation of PSCI's activities is available at <http://www.pharmaceuticalsupplychain.org/>, including the PSCI Implementation Guidance to the Principles.

The Principles address five areas of responsible business practices - ethics, labor, health and safety, environment, and management systems. AAA strongly encourages our business partners to adhere to the Principles. The Principles may be voluntarily supported by any business in the pharmaceutical industry.

Our Values

AAA sets high standards for conducting business ethically and in accordance with the law. We expect the same commitment from our business partners. This Business Partner Code of Conduct presents basic principles for business partners in dealings with AAA. Our business partners should also apply these or similar principles to the partners with whom they work in providing goods and services to AAA.

AAA is firm in its resolve to do business only with those partners that share the company's commitment to responsible business behaviors and practices, both in the United States and abroad. As a condition of doing business with AAA, it is required that AAA business partners operate in full compliance with all applicable laws, rules and regulations applicable to them. We remain mindful of differences in culture and the challenges associated with interpreting and applying these principles globally, and believe that what is expected is universal. We understand that the methods for meeting these expectations may vary in order to be consistent with the laws, values and cultural expectations of the different societies in the world.

These principles are not intended to replace, supersede or conflict with any applicable legal or regulatory requirement or contractual obligation with AAA. It is up to each business partner to determine how to meet and demonstrate compliance with the principles and standards, as stated in this Business Partner Code of Conduct.

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LABOR & HUMAN RIGHTS

Business partners shall be committed to uphold the human rights of workers.

Freely Chosen Employment

Business Partners shall not use forced, bonded or indentured labor or involuntary prison labor.

Child Labor and Young Workers

Business Partners shall not use child labor. The employment of young workers below the age of 18 shall only occur in non hazardous work and when young workers are above a country's legal age for employment or the age established for completing compulsory education.

Non-Discrimination

Business Partners shall provide a workplace free of harassment and discrimination. Discrimination for reasons such as race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status is not condoned.

Fair Treatment

Business Partners shall provide a workplace free of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, and no threat of any such treatment.

Wages, Benefits and Working Hours

Business Partners shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Business Partners shall communicate with the worker the basis on which they are being compensated in a timely manner.

Freedom of Association

Open communication and direct engagement with workers to resolve workplace and compensation issues are encouraged. Business Partners shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

HEALTH & SAFETY

Business Partners shall provide a safe and healthy working environment, including for any company provided living quarters.

Process Safety

Business partners shall have programs in place to prevent or mitigate catastrophic releases of chemicals associated with operations and processes. Programs shall be commensurate with the facility risks.

Emergency Preparedness & Response

Business partners shall identify and assess emergency situations in the workplace and any company-provided living quarters, and minimize their impact through prevention and by implementing emergency plans and response procedures.

Hazard Information

Safety information relating to hazardous materials, including pharmaceutical compounds and pharmaceutical intermediate materials, shall be available to educate, train and protect workers from hazards.

ENVIRONMENT

Business partners shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment. Business partners are encouraged to conserve natural resources, to avoid the use of hazardous materials where possible and to engage in activities that reuse and recycle.

Environmental Authorizations

Business partners shall comply with all applicable environmental regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained and their operational and reporting requirements followed.

Waste And Emissions

Business partners shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment.

Spills And Releases

Business partners shall have systems in place to prevent and mitigate accidental spills and releases into the environment.

ETHICS

Business Partners shall conduct their business in an ethical manner and act with integrity.

Business Integrity and Fair Competition

All corruption, extortion and embezzlement are prohibited. Business Partners shall not pay or accept bribes or participate in other illegal inducements in business or government relationships, including, without limitation, in violation of the US Foreign Corrupt Practices Act and the UK Bribery Act. Business Partners shall conduct their business consistent with fair and vigorous competition and in compliance with all applicable anti-trust laws. Business Partners shall employ fair business practices including accurate and truthful advertising.

Identification of Concerns

All workers should be encouraged to report concerns or illegal activities in the workplace without threat of reprisal, intimidation or harassment. Business Partners shall investigate and take corrective action if needed.

Privacy

Business Partners shall safeguard and make only proper use of confidential information to ensure that company, worker, and patient privacy rights are protected.

MANAGEMENT SYSTEMS

Business Partners shall use management systems to facilitate continual improvement and compliance with the expectations of these principles.

Commitment and Accountability

Business Partners shall be able to demonstrate commitment to the concepts described in this document by allocating appropriate resources.

Legal and Customer Requirements

Business Partners shall identify and comply with applicable laws, regulations, standards and relevant customer requirements.

Risk Management

Business Partners shall have mechanisms to determine and manage risks in all areas addressed by this document.

Documentation

Business Partners shall maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable regulations.

Training and Competency

Business Partners shall have a training program that achieves an appropriate level of knowledge, skills and abilities in management, and workers to address these expectations.

Continual Improvement

Business Partners are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and management reviews.

ETHICAL BUSINESS PRACTICES

Conflict of Interest

Business Partners should avoid any interaction with, any AAA employee that might conflict, or appear to conflict, with that employee acting in the best interests of AAA.

Clinical Trials

When engaged in clinical trials on behalf of AAA, all clinical trials shall be conducted in accordance with the global standards of Good Clinical Practices, applicable local regulatory requirements and following the ethical principles that have their origin in the Declaration of Helsinki.

Product Quality

Business Partners involved in the supply, manufacturing, packaging, testing, storage and distribution of materials/products on behalf of AAA will ensure compliance with applicable quality regulations and Good Manufacturing Practice and Good Laboratory Practice requirements for the markets in which the products are registered and distributed.

Performance of Services

Business Partners shall provide their services with a high degree of probity and undertake to comply with all applicable regulations and laws, as well as with any applicable standard of conduct applicable to them.

Marketing & Promotional Practices

All marketing and promotional materials and activities must conform to high ethical, medical and scientific standards, and comply with all applicable laws and regulations. When engaged with health care professionals, patients or animal health care professionals, all Business Partners must adhere to relevant industry standards of conduct that apply to them, such as the European Federation of Pharmaceutical Industries & Associations (EFPIA), the International Federation of Pharmaceutical Manufacturers & Associations (IFPMA) and the Pharmaceutical Research and Manufacturers of America (PhRMA).

Gifts, Meals, Entertainment

Business Partners should not provide any gift, meal or entertainment to a AAA employee in any situation in which it might influence, or appear to influence, the employee's decision in relation to the Business Partner. In other situations, modest gifts, meals or entertainment may be offered to a AAA employee if they are not cash or cash equivalents, are consistent with customary business practice, not frequent or expensive, and do not violate any law.