

## Vita's Purchasing and Marketing Code of Ethics

It is Vita's policy;

- To reject any business practice which might reasonably be deemed improper and never to use one's authority for personal gain.
- To optimise the use of resources over which one has responsibility to provide the maximum benefit to Vita.
- To comply both with the letter and the spirit of the law in the jurisdiction in which Vita operates.
- Any personal interest which may affect or be seen by others to affect impartiality in any matter relevant to his/her duties must be declared.
- Vita's business information should be kept confidential in the interests of the business and such information must not be used for personal gain.

Maintaining confidentiality of Vita's business information and acting in the best interests of the company should be used to determine what, if any, information may be disclosed to a third party. Any business information given in the course of duty should be accurate and honest.

- **Competition**

Contracts and business relationships should always be conducted to ensure products and services are delivered on time and to the benefit of Vita. Arrangements, which might in the long term prevent the effective operation of fair competition, must be avoided.

- **Government Officials**

Any purchasing that involves any officials of local or national government in any jurisdiction must be treated cautiously and the Legal Department must be involved in all steps of such purchasing.

- **Business Gifts**

Receipt of, or the offer by, any Vita employee or representative of business gifts should be rare and should **not be in excess of €75**. If they are in excess of €75 such gift must be approved by **the Business Manager, Regional Director or CEO** - this after bearing in mind all other elements of this code of ethics. This does not include the provision of marketing materials. If an employee is in doubt about what is or is not acceptable, they must contact the Legal Department.

- **Hospitality**

The recipient should not allow him or herself to be influenced or be perceived by others to have been influenced in making a business decision as a consequence of accepting hospitality. The frequency and scale of hospitality accepted should be managed openly and should not be greater than Vita would reciprocate; in addition it must be brought to the attention of the individual's immediate supervisor. Business trips hosted by suppliers that involve an overnight stay and that mix business and pleasure (other than dining out) must be brought to the attention of the individual's immediate supervisor. Business trips that are not predominantly focused on business will not be authorised. When it is not easy to decide between what is and is not acceptable, advice should be sought from the individual's immediate supervisor.

- **Business Gifts and Hospitality Record Keeping**

Each Business Manager is responsible for ensuring all gifts and hospitality in excess of €75 which are either received or given are recorded in a register. Approval of the Business Manager, Regional Director or CEO is required prior to accepting any gift or hospitality in excess of €75 and this approval should also be recorded.

The register must be kept up to date and be available for review by external auditors.

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