



Code of Conduct



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About Our Company

HealThink

Modern healthcare environment is a very challenging area that demands an experienced partner who can creatively Think how to successfully deliver innovative solutions in the Health sector using all modern IT advancements, while operating on time and on budget, aiming at providing the best possible outcome.

Inspired by the synthesis of key words Health, IT and Think and their combined significance to current demands, HealThink was founded to provide high class research, innovation and development services in the health and social care sector. HealThink realizes the importance of bioethics and the ethical challenges that arise relatively to healthcare and health research, offering full scale bioethics consultancy in the healthcare sector.



Our Mission

- Support decision-makers by providing systematic, unbiased, and evidence-based assessments of health technologies
- Offer innovative services, tailored to the distinctive needs of our clients
- Strengthen the value of our clients' data by making transparent use of robust data analysis methodologies
- Make efficient use of available resources to communicate the added value of innovative solutions
- Support the implementation of efficient and sustainable innovative care pathways and ICT-enabled integrated care models
- Identify and address key ethical issues in clinical research, personal data management and accessibility to innovative technologies

More Info [Here](#)

Message from the Scientific Director

A successful business for us is an ethical business. Success, for us, is not quantified in terms of revenue or business income! We value success in terms of character, self-awareness, honesty, emotional intelligence and hard work. How we treat ourselves, others and how we use our talents to improve the lives of others.

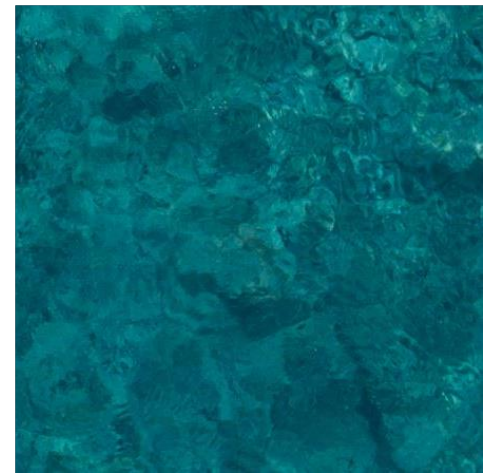
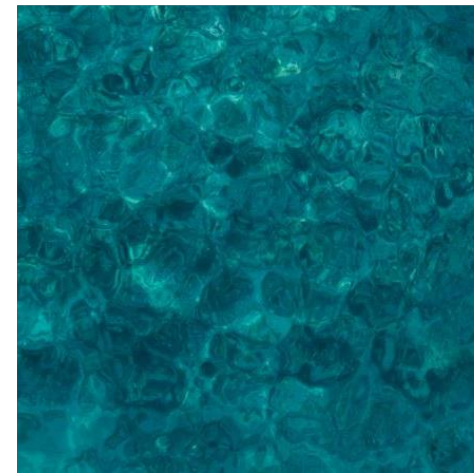
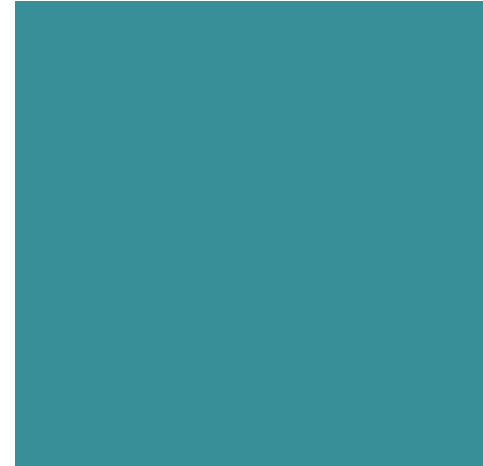
HealThink aims to operate in a manner that reflects high ethical standards and is committed to complying with all applicable laws, regulations, and other legal requirements. Accordingly, HealThink seeks to conduct business with third- party vendors who share our commitment to high ethical standards and operate in a responsible and ethical manner.

Ethical decision making is not always an easy path. It requires the use of one's judgement to evaluate situations and associated risks. Doing the right thing at the right time and for the right reason requires balance, fairness and courage.

This Code of Conduct contains the principles that guide us and covers the domains which are essential to our culture of Integrity. It gives practical guidance on how to behave when interacting with any kind of stakeholders. Each of us needs to know, understand and apply these principles in our daily work.

Each of us must bring HealThink's Code of Conduct to life and be inspired not only to innovate, but to act with integrity.

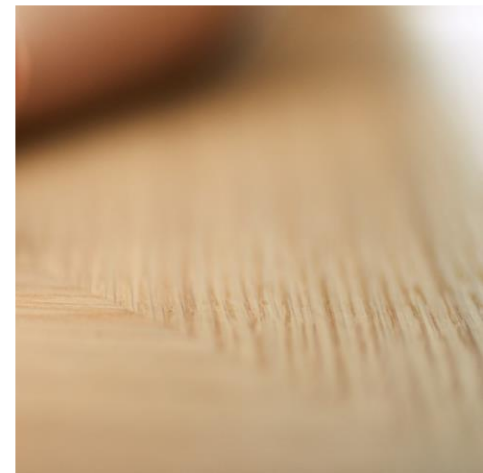
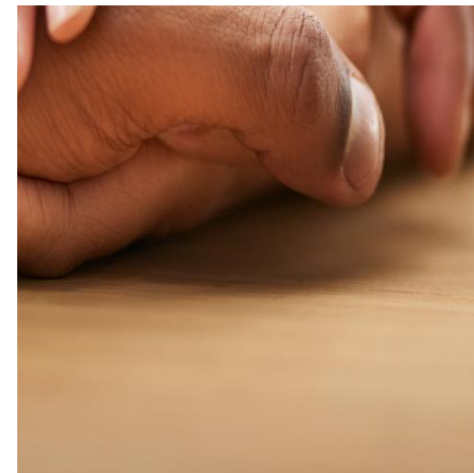
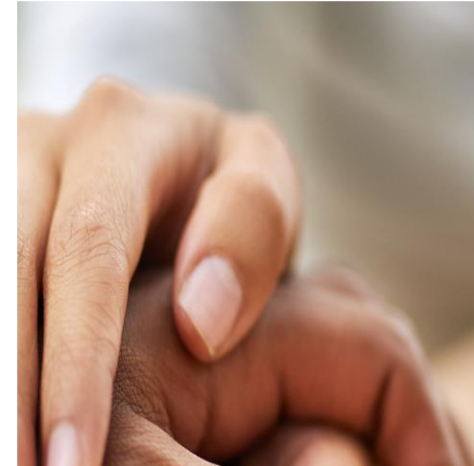
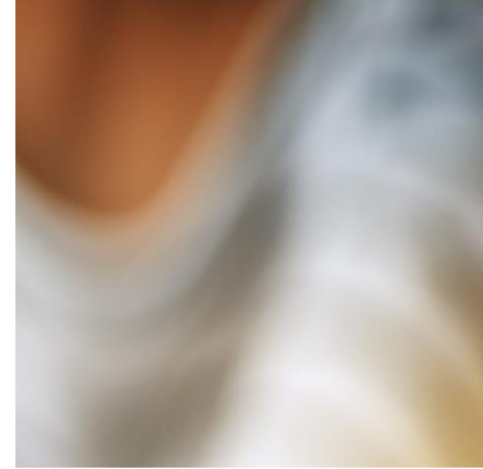
Panos Stafylas



Stay focused on your mission, remain steadfast in your pursuit of excellence, and always **DO THE RIGHT THING**

Mark Esper

Our Code of Conduct is here to do that. It sets out who we are, what we stand for, and the principles we hold ourselves accountable to. Put simply, it explains our commitments to doing what's right, and helps us make good choices.



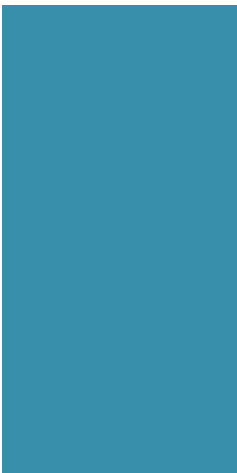


Raise a Concern

If a HealThink's employee has a concern or believes in good faith that a law, regulation, provision of our Code of Conduct has been or is about to be violated, he/she has the duty to raise the concern through the channel he/she considers to be the most appropriate.

Who is Concerned

This Code of Conduct applies to every HealThink's employee and contractor, and to everyone conducting business on behalf of HealThink.



Our Company Values

Ethical Values that support each of us to make good decisions and meet our commitments



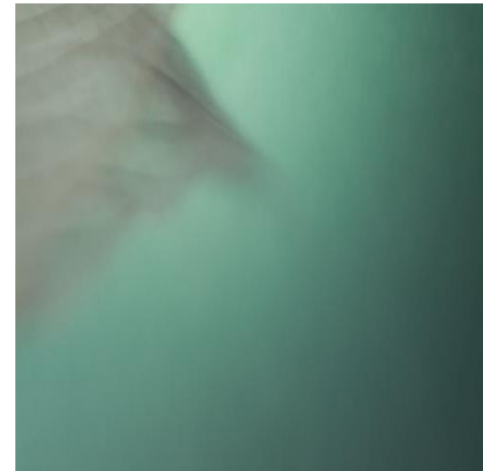
Customer Focus

We place our customers at the center of everything we do, and we make decisions based on how those decisions impact them — as opposed to focusing on profits above all else. We develop a deep understanding of the challenges our customers face and we build successful, enduring relationships with them. We adapt to the ever-changing market conditions and in collaboration and alignment with our customers we develop flexible, innovative solutions to enable their success.



Honesty

Honesty is part of the foundation of our core values and principles. Honesty is not just about telling the truth. It's about being real with yourself and others about who you are and what you want. Honesty promotes openness, empowers us and enables us to develop consistency in how we present the facts. Honesty sharpens our perception and allows us to observe everything around us with clarity and professional integrity.



Our Company Values

Ethical Values that support each of us to make good decisions and meet our commitments



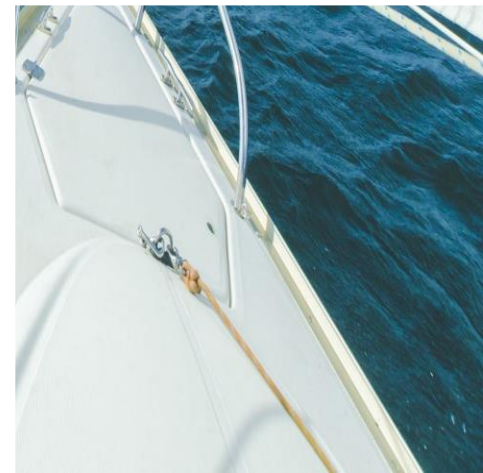
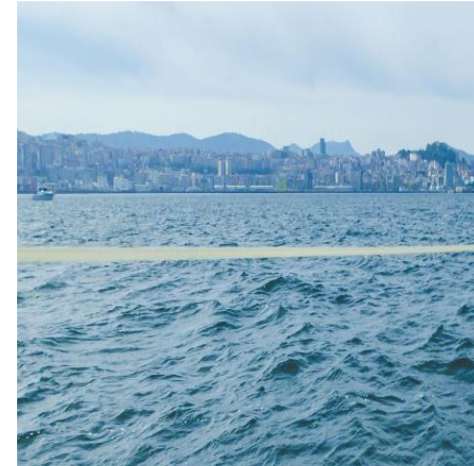
Accountability

Accountability is essential for an organization and for a society. Without it, it is difficult to get people to assume ownership of their own actions because they believe they will not face any consequences. We constantly challenge ourselves whether we take responsibility for our decisions, whether we treat others as we would like to be treated and whether we put the team and the well-being of others before ourselves



Integrity

We live in accordance with our deepest values, and we know the difference between right and wrong and choose to do what's right – for our employees, customers, and stakeholders – every time. Integrity is a highly valued trait for HealThink. We seek out diverse perspectives, communicate openly and honestly, and treat others with respect.



Our Company Values

Ethical Values that support each of us to make good decisions and meet our commitments



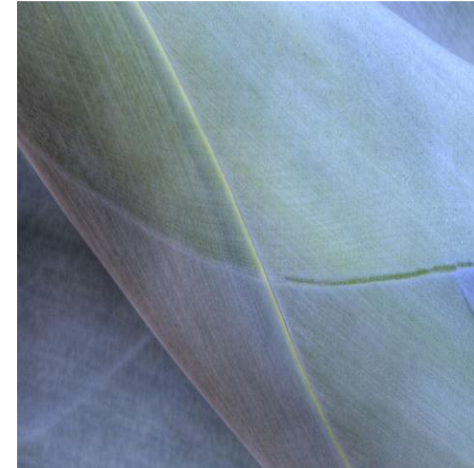
Excellence

Excellence means greatness — the very best. Achieving excellence is never easy to do. We are passionate about our work and want our name to stand for excellence. We are proactive and deliver high-quality solutions. We acknowledge our mistakes and use them as an opportunity to learn and continuously improve our work.



Courtesy

Courtesy for HealThink is a high valued virtue. We respect others and we consider that learning to have courtesy is a must for everyone who desires to make progress in life. Courtesy is a small investment that pays off well and big.



Corporate Integrity

Antitrust & Fair Competition

Competition drives innovation and leads to greater choice of higher quality products and services at competitive prices, benefiting patients and society.

HealThink competes vigorously and fairly for business based on the merits of our services. HealThink conducts business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which we conduct business. Antitrust and fair competition laws are strictly enforced.

Competition and antitrust issues may arise from contacts between HealThink and its competitors, vendors or customers. All employees must comply with competition and antitrust laws and refrain from all unfair behaviour towards competitors, such as exchanging competitively sensitive information with competitors.



Corporate Integrity

Competitive Information

Information about competitors is a valuable business tool, but it must be obtained from public sources. These sources include websites, public presentations, journal articles, or advertisements. We should not seek competitive information illegally or in any improper way. Also, we should not misrepresent who we are or for whom we work.

Always keep confidential the information of our customers, vendors, and competitors. We should not use customers' or competitors' employees as sources of non-public information. We should not discuss the confidential information of a former employer. No one at HealThink should ask you to give such information.



Corporate Integrity

Anti-corruption

HealThink does not tolerate any form of bribery or corruption. We will not give, offer or promise to give anything of value or accept, request or agree to receive anything of value for the purpose of improperly influencing any decisions. We will not use third parties to commit acts of bribery or corruption.

Anything of value may include but is not limited to:

- cash gifts
- entertainment, accommodations and meals
- travel expenses, services, employment offers, loans
- donations or contributions
- any transfer of value, even of nominal value.

HealThink also prohibits facilitation payments, which are payments to government officials to expedite the performance of routine governmental actions (e.g., obtaining licenses, permits, or other needed government documents).



Corporate Integrity

Interacting with Healthcare Professionals and Government Officials

Many of our services require contact with healthcare professionals and government officials. Laws and regulations often apply to such relations. If our work involves interaction with such persons, we must make sure such interactions:

- Comply with our policies and procedures, applicable regulation and code of ethics
- Serve a business purpose such as education or research and
- Do not interfere or appear to interfere with a healthcare professional's independent medical judgment or a Government Official's performance of duties.

Gifts, meals, and other benefits must never be for the purpose of, or of such value, that they are likely to improperly influence the healthcare professional's medical or professional judgment or decisions. No gifts, meals, or entertainment may be offered to government officials without the prior written approval of the Legal & Corporate Affairs Director.

In addition to complying with our general standards of integrity and ethical conduct, HealThink's employees must act with integrity in interactions with government officials and healthcare professionals.



Corporate Integrity

Use of Social Media

Nowadays, the use of social media has become part of our daily life and communication style. Posting or commenting on online content can easily affect the image and reputation of our company, employees, or business partners. Therefore, HealThink's employees must use social media responsibly.

Besides only designated employees are authorized to communicate on behalf of HealThink about our company or services on social media.

Responsible lobbying

Contributing to the development of policies that are beneficial for society builds trust. Data and insights provided to policy makers enables them to make better informed decisions to help improve patient outcomes.

We commit to share fact-based information in a transparent way and take the perspectives of all relevant stakeholders into account. We engage in public discourse on issues of societal and political nature linked to our mission, our field of expertise and our ability to deliver breakthrough innovation.



Managing Info & Assets

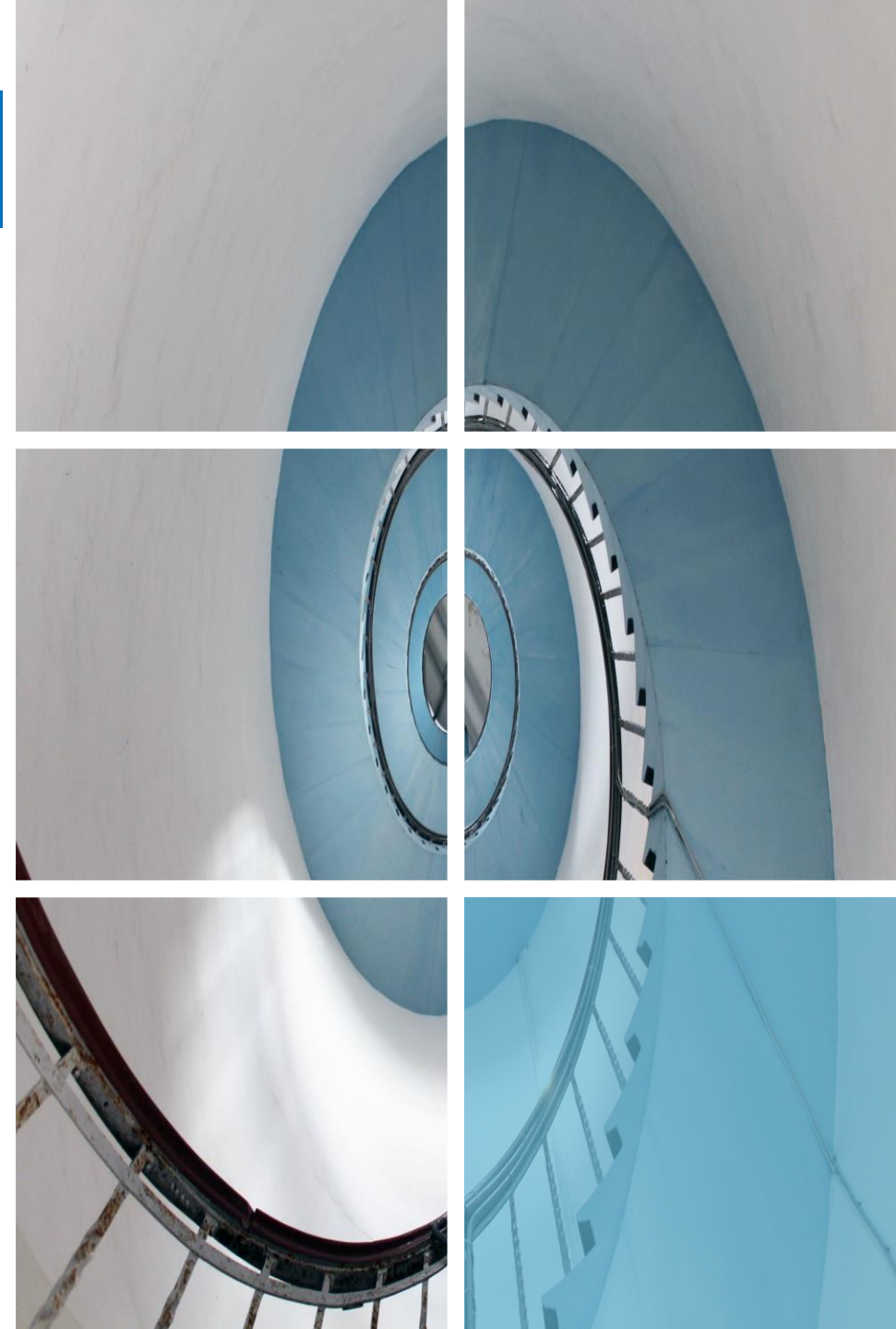
Confidential Info & Cyber Security

Having access to the right information is instrumental to achieving our purpose and mission. At the same time, we have an obligation to safeguard our customers' and partners' information.

HealThink takes accountability for the information and technology we handle. We protect our data and technology and ensure that information is kept safe from theft, loss, misuse, or disclosure.

Examples of confidential information include:

- the company's business and financial condition
- strategic/business plans, pricing information
- information relevant to medicinal products and health technologies (such as clinical trials, value dossiers, market shares and others)
- marketing plans and business development strategies
- confidential information entrusted by customer and business partners.



Managing Info & Assets

Intellectual Property (IP)

Protecting our intellectual property and respecting the IP rights of others is crucial to maintaining our competitive advantage. Intellectual property includes any creative works that may be protected or protectable as patents, trademarks, trade secrets, copyrights, know-how, or otherwise under intellectual property laws.

In our publication activities, we use due caution to protect the privacy and personal information of research subjects and to prevent copyright infringement and the premature disclosure of patentable information.

Insider Info & Trading

Insider trading occurs when a person trades in a company's securities while aware of material non-public information about that company. The most typical examples of insider trading are selling shares before bad news causes the share price to drop or buying shares before good news causes the shares to go up.

We will not engage in insider trading. We will not misuse insider information, or other non-public information that could have an impact on any company with which we do business. We preserve the confidentiality of information we may have received from third parties.



Managing Info & Assets

Data privacy & Confidentiality

The responsible use of data helps us maintain trust with stakeholders, including associates, patients, health care professionals and society. It ensures we will continue to have access to the kind of data we need to innovate and operate.

We use personal information that we are entrusted with in a responsible way. We adhere to our Data Privacy principles and ensure our external service providers also commit to these principles.

We each must sign a Confidentiality Agreement as part of our work with HealThink. This agreement and our policies prohibit us from using, duplicating, modifying, or disclosing confidential information of HealThink or related third parties without appropriate written authorization. We each have an obligation to protect confidential information we receive or create in the course of our work, as well as other sensitive information we receive from customers, suppliers, partners, and others that may be of use to competitors, or harmful to HealThink or its customers, if disclosed.



Specifically:

- We comply with applicable laws and regulations of the jurisdictions in which we collect, store, and use personal information
- We collect, use, disclose or store the minimum amount of personal data necessary to achieve a legitimate purpose
- We only retain data for as long as is necessary for their processing purpose, in compliance with local legislation
- We protect personal data while we collect, process, use, disclose and store it.
- We are careful when speaking or handling confidential information in public places such as airports, restaurants, or through various public communication channels
- We are careful when using mobile devices or systems
- We do not share confidential information outside HealThink unless the third party has signed a Confidentiality Agreement or non-disclosure agreement approved by the Legal & Corporate Affairs Director
- We share confidential information only on a “need to know” basis to third party recipients and when sharing internally to others working for or on behalf of HealThink and
- We double check content and addresses on letters, packages, emails, and fax numbers prior to sending confidential information. Think before disclosing.



Personal Integrity

Human Rights

Respect for human rights is an ethical obligation and an opportunity for transformative change in people's lives.

We conduct our business in a manner that respects the rights and dignity of all people. We are committed to respecting and promoting human rights, consistent with the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights.

We will strive to prevent, mitigate and remedy adverse human rights impacts throughout our workplace, business operations and in the communities in which we work.

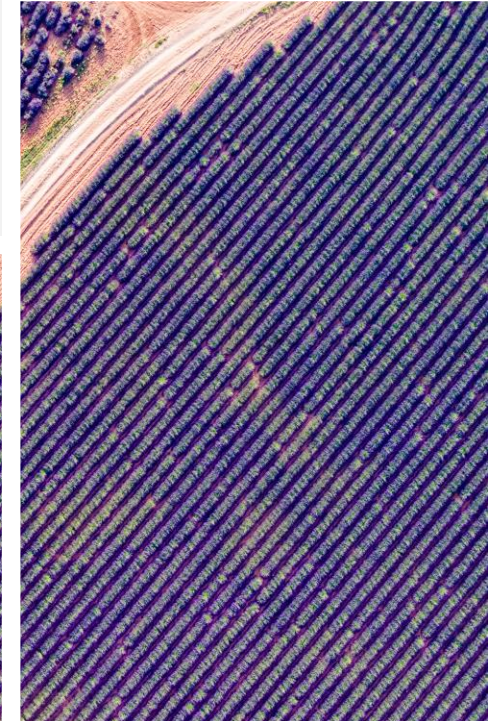
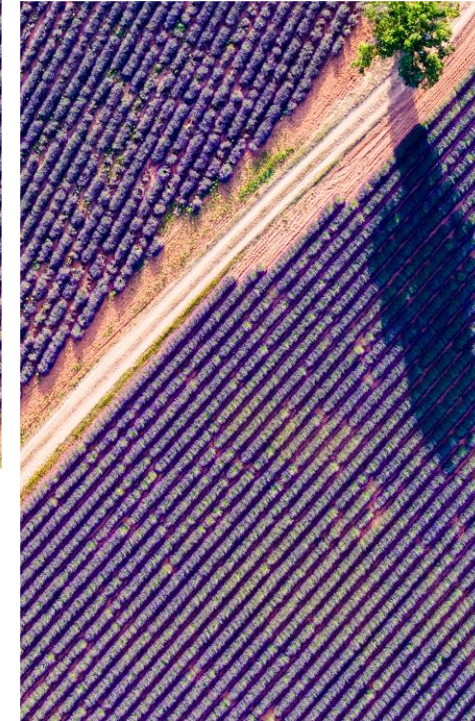
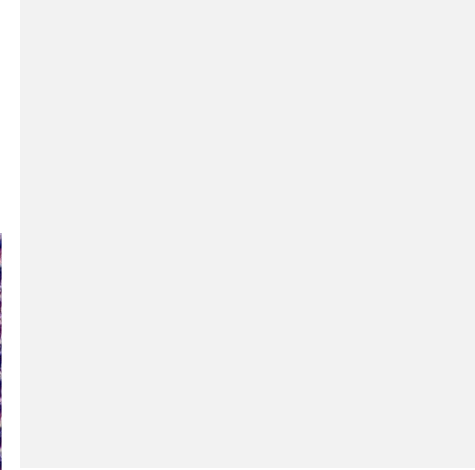
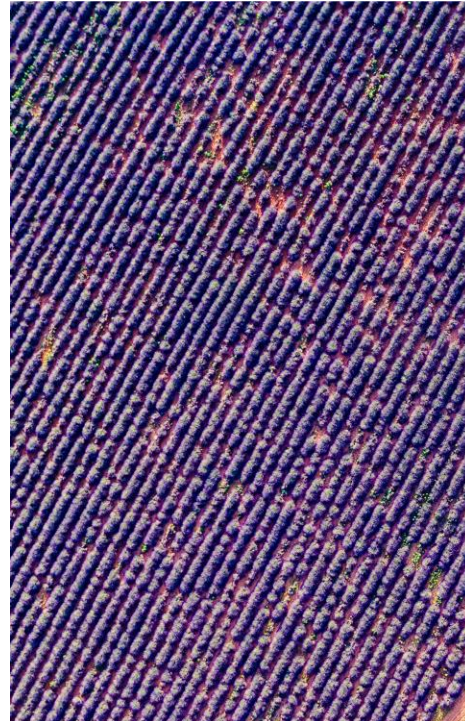
We want to protect people from abuse by those who are more powerful.

Personal Integrity

Respecting People & the Environment

HealThink fosters a stimulating, creative, inclusive and non-discriminatory workplace for all employees, customers and business partners. We take all necessary measures to maintain a safe, secure and healthy work environment. We do not tolerate unsafe, violent, or disruptive behavior in our workplace.

HealThink is also committed to make careful use of natural resources and to minimize any harmful impact on the natural environment by economizing on resources, such as heating, electricity, and water as well as by recycling and correctly disposing of the office waste. All associates working at HealThink's premises are required to act with due consideration to the protection of the environment.



Conflict of Interest

To maintain trust and confidence with all our stakeholders, we must ensure that we make decisions that are in the best interest of our company, our customers and society.

A conflict of interest is a situation posing a risk that personal interest will interfere with HealThink's legitimate business interests. Any conflict of interest creates an appearance of impropriety, which may undermine confidence in our company. For these reasons, it is essential to identify any potential conflict of interest and handle it effectively.

To ensure our business judgement is not influenced by personal interests, we will disclose and manage potential, perceived and existing conflicts of interest.

We respect everyone's right to be involved in personal activities outside the scope of his/her job as long as they do not get in the way of the work responsibilities. Any activity or relationship that might conflict – or appear to – with HealThink's interests must be avoided. Such a situation can arise in a variety of ways.

External Commitments

- Working for or receiving compensation from a HealThink's vendor or customer
- Maintaining a financial interest in or a relationship with a HealThink's competitor, customer or vendor, or with any third-party doing business with HealThink
- Soliciting personal benefits from a third party for influencing a favorable decision by HealThink towards such third party
- Engaging in any outside activity substantial enough to raise questions about our ability to devote appropriate time and attention to our assigned responsibilities.

Personal Relationships

- Interacting with a relative working for, or applying to work for, HealThink, a competitor, vendor or customer of HealThink
- Purchasing goods or services on behalf of HealThink from a relative or a firm in which a relative has any interest
- Receiving an item of value
- Accepting a gift might cause the receiver to feel an obligation, potentially undermining the objectivity of his/her decisions, and may be perceived as a gift intended to corrupt him/her or another HealThink's employee.



Personal Integrity

Gifts & Entertainment

Gifts and entertainment to, from, or for customers, vendors, or other third parties must be:

- Legal, non-repetitive, and appropriate for the level of both giver and receiver,
- Of a reasonable amount, non-inducing value and
- Accurately recorded in accordance with Company expense reporting and internal accounting requirements.

We should refrain from offering or providing gifts, hospitality or anything else of value to healthcare professionals and/or government officials, to induce or obtain favourable decisions about our products and services.



Employment

Discrimination and Harassment

We should not tolerate harassment and all forms of discrimination on grounds such as gender, age, origin, religion, physical appearance, sexual preferences, political opinions, family situation, health disability.

We should respect others, behaving towards them as they deserve to be treated as fellow human beings.

We should challenge our bias and avoid prejudice about the opinions, appearance, or attitudes of our colleagues.

We should contribute to creating a positive work environment for people working in or for.

We should also encourage external business partners to respect these same principles in their interactions.

Fair Employment Practices

Fair employment practices benefit all our associates, as well as society, and provides the integral foundation to support our commitment to human rights.

We give equal opportunity for each employee or job applicant in recruitment, training access, compensation, welfare, internal mobility and career development. Skills, experience and personal aptitude are the only factors we consider.

We value the contributions of all our associates and encourage them to express themselves and their opinions freely in a professional way.



Employment

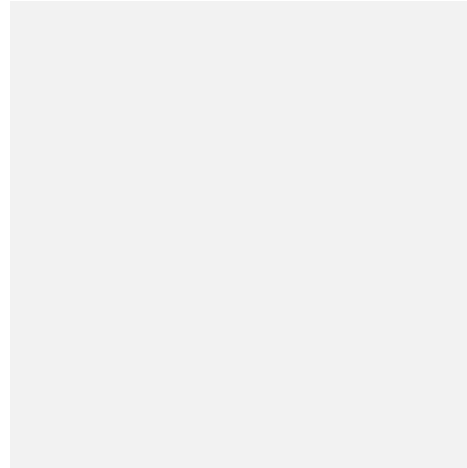
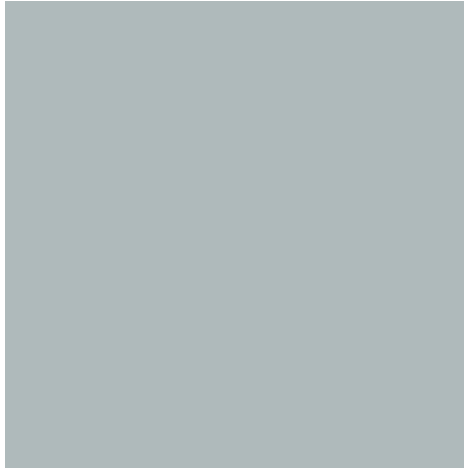
Diversity & Inclusion

Being inclusive of all individuals helps us to generate new ideas, drive innovation, understand our stakeholders and be closer to our customers and society.

We promote diversity, practice fairness and express courtesy in our interactions with individuals inside and outside HealThink.

Promoting diversity, as we believe the distinct identities of our people and external business partners are a source of strength and a key ingredient of our success.

We listen to different communities with a learning mindset, to do what we can to contribute to building a world that is safer and more inclusive.



Safety & Security

HealThink strives to maintain a healthy, safe and environmentally friendly workplace for our associates, contractors, vendors and visitors.

Strive to prevent accidents, avoid health risks, promote wellbeing as well as reduce environmental impacts.

We engage our partners, suppliers, and contractors to adopt responsible health, safety and environmental protection policies. HealThink complies with applicable legal requirements and industry standards related to environmental, health, and safety.



Responsibilities

Legal & Corporate Affairs Director

The Legal & Corporate Affairs Director, as HealthThink's Compliance Manager, is responsible for overseeing the company's compliance policy, including the monitoring and evaluation related to ethical, legal and regulatory obligations. The Legal & Corporate Affairs Director ensures the broad application and consistent interpretation of ethical standards throughout the company.

Associates and Approved Suppliers/Vendors

All HealthThink's associates and approved suppliers/vendors are responsible for upholding the highest standards when conducting business of behalf of HealthThink. They are therefore expected to conduct HealthThink's business based on:

- standards of honesty, loyalty, trustworthiness, fairness, concern for others and accountability
- good judgment and common sense
- sensitivity to any situations that can adversely impact HealthThink's reputation, and the integrity of the services offered by HealthThink.

Open Door Policy

The quick and effective resolution of complaints, problems and conflicts is the basis for a harmonious social life at the workplace, as well as for a smooth cooperation with customers and suppliers.

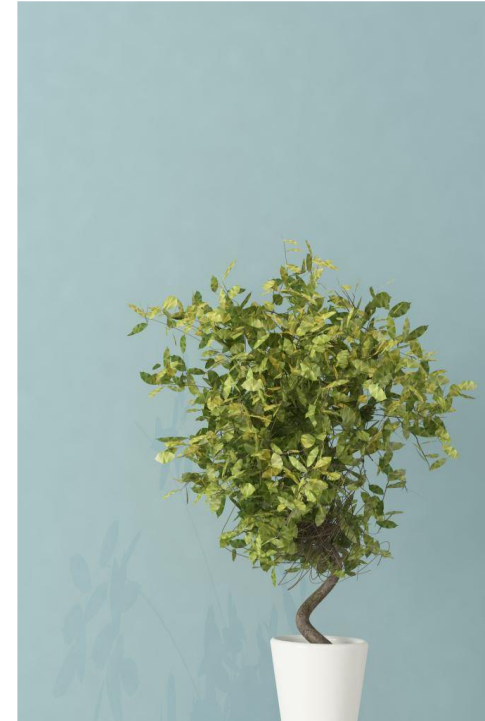
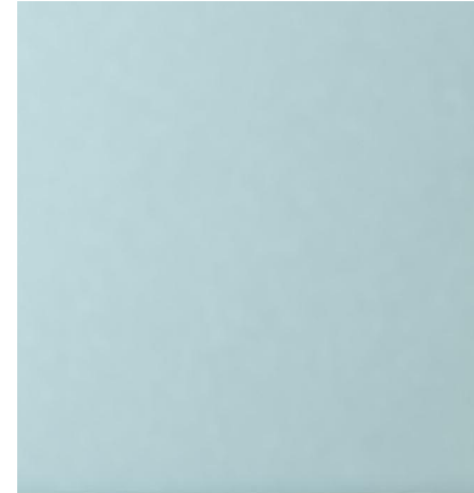
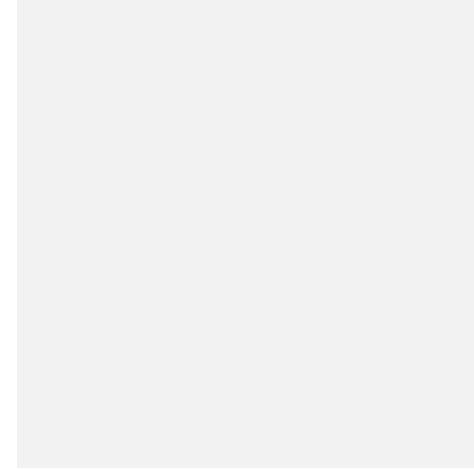
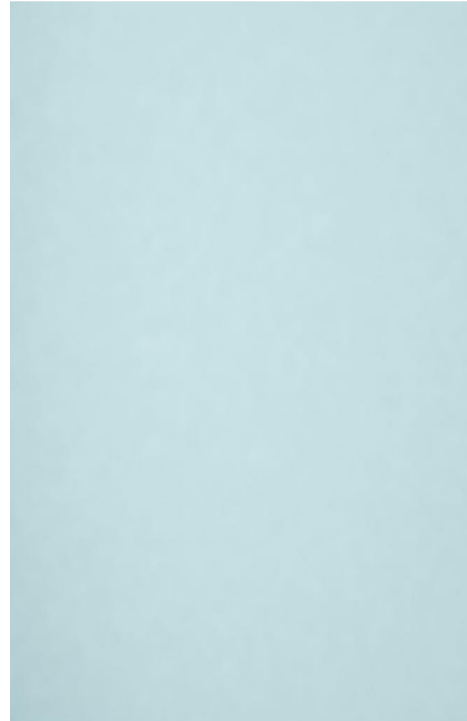
Therefore, the Legal and Corporate Affairs Director has the responsibility to maintain a direct, informal communication line and encourage associates to address themselves directly to him/her and speak openly about any issue, at any time.

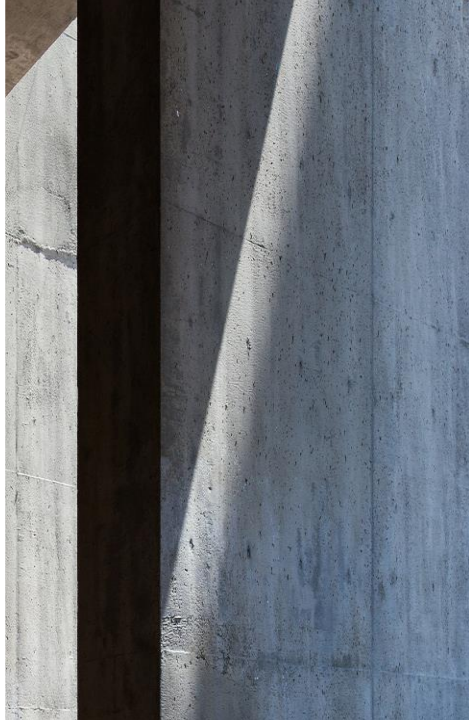


Confidential Disclosure Policy

HealThink maintains a confidential disclosure policy that allows associates to report to HealThink's management suspected violations of national or European requirements or of HealThink's policies and procedures. HealThink's management will make a good faith inquiry into any reported violation.

HealThink shall not tolerate retaliation against any associate who reports a suspected violation in good faith or who participates in any investigation of a suspected violation. HealThink thus commits to investigate any reported case of retaliation and to take appropriate action to prevent future occurrences.





Notification & Compliance

The Code of Conduct shall be communicated to all HealThink's associates and approved suppliers, who are expected to adhere to its principles.

Besides, the Code of Conduct shall be posted on HealThink's website, so that it can be easily accessed by customers, suppliers and anyone interested in HealThink's compliance policy.

Disciplinary Action


Intentional or unintentional violation of the Code of Conduct may ensue disciplinary action commensurate with the seriousness of the incident. Associates who negligently or willfully fail to comply with the Code of Conduct and/or omit to report violations of the Code of Conduct may be subject to disciplinary action, ranging from oral reprimand up to the suspension or termination of the cooperation with HealThink.

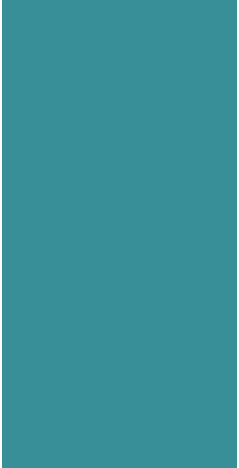


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HEALTHINK
Medical Research & Innovation

