

Conflict of Interest Policy

Cayman Pharma, Czech Republic

1. Purpose

The purpose of this Conflict-of-Interest Policy is to ensure that all employees and managers act in the best interest of Cayman Pharma and avoid situations where personal, financial, or other interests could interfere with professional judgment, objectivity, or integrity. This is particularly important in the pharmaceutical sector where ethical conduct, regulatory compliance, and transparency are critical.

2. Scope

This policy applies to all employees and managers of Cayman Pharma.

3. Definition of Conflict of Interest

A conflict of interest arises when an individual's personal interests interfere, or appear to interfere, with the interests of the Company. Conflicts may be actual, potential, or perceived.

4. Guiding Principles

Employees must act with integrity, transparency, and accountability, make decisions in the best interest of Cayman Pharma, avoid compromising situations and disclose conflicts promptly.

5. Examples of Conflicts of Interest

Financial interests in suppliers or competitors, personal relationships affecting decision-making, external employment, and inappropriate gifts or hospitality.

6. Disclosure Requirements

Employees must disclose conflicts upon hiring and whenever a new conflict arises. Disclosures are submitted to HR.

7. Management of Conflicts

The Company assesses disclosed conflicts and applies mitigation measures such as recusal, reassignment, or approval with controls.

8. Responsibilities

Employees must disclose conflicts, managers must review and manage them, HR maintain records and provide guidance.

9. Non-Compliance

Failure to comply may result in disciplinary action or legal consequences.

10. Confidentiality

All disclosures are handled confidentially in line with data protection laws.