

Code of Ethics for Clinical Trials Ukraine (CTU)

I. Our Commitments to Patients

1. Access to Medicines

We strive to ensure fair and broad access to innovative medicinal products for all clinical trial participants, regardless of their social or economic status.

CTU integrates accessibility strategies already at the planning and implementation stages of the studies.

2. Patient Safety

Safety is an absolute priority.

All studies are conducted in compliance with the highest standards of pharmacovigilance, careful monitoring of adverse reactions, and prompt response to incidents.

We ensure transparent communication regarding the risks and benefits of investigational drugs.

3. Patient Engagement

We believe in partnership with patients and actively involve them in all stages of the research lifecycle — from planning to evaluation of results.

This approach increases the relevance of outcomes and promotes greater trust in science.

4. Research and Development

CTU conducts all clinical studies in accordance with ethical, scientific, and regulatory requirements.

We adhere to the principles of honesty, transparency, and scientific integrity in the collection, analysis, and publication of data.

All studies are aimed at improving the quality of medical care and public health.

II. Our Commitments to Employees

5. Diversity, Equity, and Inclusion

CTU creates an inclusive environment in which everyone has equal opportunities for growth and realization.

We do not allow discrimination on any grounds and actively support representatives of various social, cultural, and professional communities.

6. Fair Labor Practices

We ensure transparent, fair, and non-discriminatory working conditions.

All staffing decisions are made based on professional qualifications, merit, and competencies.

Any forms of coercion, harassment, or bullying are strictly prohibited.

7. Occupational Health and Safety

We adhere to high standards of occupational safety and actively implement systems and policies to reduce risks in the workplace.

CTU takes care of the physical and psycho-emotional well-being of the staff.

8. Insider Trading

We commit not to use non-public or confidential information for personal gain or to share it with third parties.

Any transactions that may be perceived as insider trading are strictly prohibited.

III. Our Commitments to Business

9. Business Continuity and Crisis Management

CTU implements risk management systems and business continuity planning to ensure the stability of service delivery, and the protection of patients, partners, and staff in crisis situations.

10. Financial Integrity

We adhere to the highest standards of financial reporting and transparency.

All financial transactions are documented accurately, timely, and in accordance with legislation and the company's internal policies.

11. Antitrust Policy and Fair Competition

CTU acts fairly and openly, not allowing any actions that could restrict competition or violate antitrust laws.

We compete solely based on the quality, efficiency, and ethical standards of our services.

12. Customs and Trade Compliance

The company fully complies with customs, export, and import regulations in its activities.

We do not cooperate with individuals or organizations that are under sanctions or associated with violations of trade laws.

13. Fraud Prevention

CTU adheres to a zero-tolerance principle toward fraud in any form.

We detect, prevent, and report all instances of potential or actual fraud.

14. Human Rights

We respect and actively protect human rights in all aspects of our operations, both within the company and in cooperation with external partners.

All forms of exploitation, forced labor, or violations of dignity are unacceptable.

IV. Our Commitments to External Partners

15. Third-Party Risk Management

CTU carefully selects partners based on their reputation, competence, and compliance with ethical and professional standards.

We conduct regular audits and monitor cooperation to minimize risks.

16. Professional Ethics

We uphold the highest standards of professional conduct in all business relations.

All our interactions with partners are based on honesty, responsibility, respect for contractual obligations, and compliance with the law.

17. Participation in Public Policy Development

CTU supports transparent dialogue with public authorities and other stakeholders.

We participate in the development of legislation in the field of healthcare and clinical trials, relying on scientific evidence and patient needs.

18. Conflict of Interest

All decisions made at CTU must be free from personal interest influence.

Employees are obliged to disclose any actual or potential conflict of interest and to avoid situations that could affect impartiality.

V. Our Commitments to Society and the Environment

19. Environmental Sustainability

CTU recognizes the importance of environmental protection and sustainable development.

We actively support initiatives aimed at minimizing the environmental impact of our operations.

All our activities are conducted in accordance with the principles of environmental responsibility, including the rational use of resources, reduction of carbon emissions, and implementation of practices that contribute to the preservation of natural resources for future generations.

20. Data and Technology

CTU adheres to the principles of transparency, accuracy, and confidentiality in data handling.

We use advanced technologies for the collection, processing, and analysis of clinical trial data, ensuring high quality of results and the protection of participants' rights.

All processes comply with the latest standards in data security and personal

information protection, including requirements set by international legal acts such as the GDPR.

21. Anti-Corruption

CTU strongly condemns any manifestations of corruption, bribery, and other unethical practices.

We have a clearly defined policy that prohibits any form of corruption in our operations and in interactions with partners.

Every employee is obligated to adhere to the principles of honesty, integrity, and transparency, and to actively contribute to the creation of a corruption-free environment.

Any violations of these principles will be strictly punished.

22. Animal Welfare

CTU supports an ethical approach to the use of animals in clinical research, in accordance with the highest international standards and animal protection laws.

We strive to minimize the number of animals used in studies and ensure their involvement is always scientifically justified and necessary.

All animal studies are conducted under the supervision of independent ethics committees, following the principle of humane treatment and ensuring animal welfare throughout the entire process.

VI. Our Obligations: Breach of the Code

23. General Principles

CTU expects unconditional compliance with the provisions of this Code of Ethics from all its employees, partners, and contractors.

Violations of these principles are serious incidents that may affect the professional reputation of the company and its ability to fulfill obligations to partners and society.

All breaches of the Code will be reviewed in accordance with internal procedures and applicable legislation.

24. Violation Review Procedure

Every CTU employee or partner is obliged to immediately report any violation of this Code.

We provide a confidential reporting channel to ensure protection for individuals who report violations.

Investigations will be conducted in accordance with the company's internal procedures, taking into account the principles of transparency, fairness, and confidentiality.

25. Accountability Measures

Violation of the Code may result in various disciplinary actions, including, but not

limited to, warnings, fines, suspension, or termination of cooperation.

In the case of serious violations, an investigation may be initiated with possible legal consequences, including referral to law enforcement authorities.

26. Continuous Improvement of Ethics and Responsibility

CTU strives to create and maintain a culture in which ethics and responsibility are at the core.

We regularly review and update our policies and practices to ensure compliance with the highest standards of ethics and professionalism.

Additionally, we invest in the training and professional development of our employees to support adherence to the Code.