



## DORC CEO COMMUNICATION: INTRODUCTION OF NEW COMPLIANCE POLICIES

October 6th 2017

Dear colleagues,

You will no doubt recall that I wrote to you all on 28 August 2017 to announce the launch of an enhanced Compliance programme at DORC and a new Global Code of Conduct that defines how we want to work as a professional organization. I mentioned in my letter that, in addition to our new Global Code of Conduct, I would be sending you further Compliance policies that represent a significant element of our Compliance programme and establish the parameters of how our organization conducts business.

I am now sending you these policies. I would encourage you all to read these policies carefully and ensure that you follow them in your daily work. You will all be required to certify that you have read and understand the policies, and agree to follow them in all aspects of your work. I have set out below a brief description of each policy and their rationale. All of these policies apply to all DORC employees, distributors, independent contractors, or any other third parties conducting business for or on behalf of DORC.

You will receive training on these policies. At a later date you'll receive an E-learning Compliance Policy and a Speak-Up Policy. Further communication on training will follow.

I am relying on each of you to work together to ensure that we hold ourselves to the highest possible ethical standards. By adhering closely to these policies, we will achieve our goal of being an admired, a respected and a high performing company and significantly reduce our compliance risk exposure.

### **Anti-Bribery and Corruption Policy**

Our Global Code of Conduct states that we do not tolerate any form of bribery or corruption. We do not bribe any public official or private person and we do not accept bribes. The Anti-Bribery and Corruption Policy sets out the principles and rules, and describes how they must be implemented.

International anti-bribery and corruption legislation is stringent. The consequences of non-compliance with these and other laws are severe and could have serious consequences for the company, its corporate officers and stakeholders. A breach of these laws is a criminal act and can lead to personal liability including imprisonment. Other sanctions include heavy fines, lawsuits, exclusion from public contracts and reputational damage.

### **Conflicts of Interest Policy**

DORC is committed to conducting business in a manner that ensures we do not allow personal interests to influence our business judgment and decision-making. When employees' personal interests either influence, have the potential to influence, or are perceived to influence their decision making at DORC, a conflict of interest situation results. The Conflicts of Interest Policy explains the relevant principles and rules for preventing or managing conflicts of interest and how such principles and rules are to be implemented.

Conflicts of interest may arise where an employee places his or her personal interests before the interests of DORC and where such personal interests unduly influence that employee's business judgments, decisions or actions. These situations may include both closely related persons and friends. Making judgments, taking decisions, or pursuing actions when facing a conflict of interest may make it difficult to perform work for DORC objectively and effectively, and may have legal and regulatory consequences.

## Anti-Trust Policy

Anti-trust law is the free market's most important tool for ensuring fair, unrestricted competition. DORC is committed to ensuring full compliance with all anti-trust legislation in the US, EU and other countries where DORC does business. The Anti-Trust Policy explains the relevant principles and rules for preventing violations of anti-trust laws.

The consequences of non-compliance with anti-trust law are severe and could have serious consequences for the company, its corporate officers and stakeholders. In many jurisdictions a breach of anti-trust law is a criminal act and can lead to imprisonment. Other sanctions include heavy fines, lawsuits, exclusion from public contracts and reputational damage.

## Policy on Interactions with Healthcare Professionals and Healthcare Organizations

This policy establishes global guidelines for professional interactions with Healthcare Professionals (HCPs) and Healthcare Organizations (HCOs) and outlines the conduct expected of DORC employees with respect to their professional activities.

Responsible behavior of all DORC employees is vital to support our mission to supply high quality and innovative techniques, instruments and equipment for ophthalmic surgery to enhance global eye surgery, to ease suffering and to enhance the quality of patients' lives. This policy serves as a guide to ethical business practices in all our interactions with HCPs and HCOs in support of our aim to conduct business with integrity.

## Due Diligence Policy

Our Global Code of Conduct states that we expect all third parties with whom we work to comply with the law and to adhere to ethical business practices. We will conduct risk-commensurate due diligence on all third parties with whom we interact to ensure that they all comply with the high standards of integrity and business ethics that we demand. DORC will only conduct business with reliable and reputable business partners of good standing and who themselves maintain the highest standards of business integrity.

The Due Diligence Policy sets out the principles and rules for conducting due diligence, and describes how they must be implemented.

## Sanctions Policy and Screening Process

DORC is committed to complying with relevant economic and trade sanctions laws in all jurisdictions in which it operates, as these may apply to its operations, through identifying, mitigating and managing the risks of sanctions violations.

This policy sets out the principles and rules for screening third parties in order to identify any sanctions risks, and describes how they must be implemented.



Thierry Leclercq