

Code of conduct

European Pulmonary Hypertension Association (PHA Europe)

PHA Europe is the umbrella organization for national associations of patients living with pulmonary hypertension (PH) in Europe. It was founded in Vienna, Austria, in 2003 and is registered as an international non-profit organization.

This document sets out the guidelines for

- interaction between PHA Europe, industry partners and other stakeholders,
- ethical behavior of PHA Europe employees, consultants, vendors and volunteers
- detecting and preventing of fraud

The collaborations and agreements undertaken with industry partners are an essential aspect of the operation of PHA Europe and it is therefore important that PHA Europe:

- offers equal opportunities to all industry partners
- is not exclusive to any one partner
- operates within a clear set of parameters that protect the interests of all stakeholders and ensures that PHA Europe remains an unbiased player of the pulmonary hypertension field
- is flexible and makes allowances for differing levels of interaction with partners dependent on the nature and requirement of the collaboration
- makes sure that educational materials remain independent and balanced
- has clear goals and reported outcomes
- respects the laws and regulations of the country in which the collaboration or agreement is taking place.

Code of Ethics

PHA Europe employees, officers and representatives are expected to act in the best interests of the organisation. The purpose for this Code of Ethics policy is to support a culture of openness, trust, and integrity in PHA Europe. A well understood Code of Ethics policy requires the participation and support of every PHA Europe management body, employee, consultant and volunteer.

PHA Europe employees, consultants, suppliers, vendors and volunteers must:

- Proactively promote ethical behavior as a responsible partner among peers in the work environment.
- Deal fairly with stakeholders, suppliers, volunteers, and employees.
- Provide constituents with information that is accurate, completely objective, relevant, timely, and understandable.
- Comply with applicable government laws, rules and regulations.
- Maintain the confidentiality of information entrusted to them except when authorized or otherwise legally obligated to disclose.
- Accept responsibility for preventing, detecting, and reporting all manner of fraud.
- Be honest and ethical in their conduct, including ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
- Protect and ensure the proper use of company assets.
- Prohibit improper or fraudulent influence over the auditors.

Fraud and anti-bribery

Fraud is defined as any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain. PHA Europe is following a “no fraud tolerance” attitude. In addition to the Board, volunteers, consultants, management and staff at all levels of PHA Europe have responsibility for preventing, detecting and reporting fraud.

In addition to the definition of fraud set out above, this Code of Conduct covers any dishonest or fraudulent act, including but not limited to:

- Misappropriation of funds, securities, supplies or other assets.
- Impropriety in the handling or reporting of money or financial transactions.
- Profiteering as a result of insider knowledge of company plans or activities.
- Disclosing confidential and proprietary information to outside parties.
- Intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to procure an advantage, benefit or gain.
- Accepting or seeking anything of material value from contractors, vendors or persons providing services/materials to PHA Europe, unless approved by the either the management (or in case of the management is receiving the contribution) or Board (bribery).

- Facilitation of payment, either directly or indirectly through consultants or other third parties, to a government employee or official that is made with the intention of expediting an administrative process.
- Destruction, removal, or unauthorized use of records, furniture, fixtures, and equipment.
- Any similar or related irregularity.

Each member of management and consultant will be familiar with the types of improprieties that might occur within his or her area of responsibility and be alert for any indication of irregularity. An employee, volunteer, consultant, vendor, contractor, or outside agency doing business with PHA Europe shall immediately report any irregularity that is detected or suspected. Any employee or person who suspects or reports dishonest or fraudulent activity shall not attempt to personally conduct investigations or interviews related to any suspected fraudulent act.

Vienna, 2022.