

pharmaand GmbH

CODE OF CONDUCT

Foreword

We at the pharma& Group (i.e. pharma& headquarters and subsidiaries and Loba biotech GmbH) have a shared dedication to breathe new life into proven medicines and aspire to leave no single patient behind. As a trusted partner with global reach, a portfolio of essential medicines in specialized therapy areas, innovative solutions tailored to patient needs, and a team of empowered, entrepreneurial experts, we collaborate with a passion for securing long-term access to essential medicines.

An important pillar of our success story is that we always view responsible and legally compliant behavior as an indispensable part of the Company culture. At the pharma& Group, we comply with all applicable laws and regulations. We have an unwavering commitment to compliance and ethics and value the integrity of the organization and each individual.

We encourage you to familiarize yourself with the pharma& Group Code of Contact as it serves as our guide to ethical and professional behavior. It embodies the principles that define who we are and how we operate as a team. Most importantly, if you have any doubts or need advice, please contact the pharma& Group Compliance team.

The choices we each make every day reflect on ourselves and the pharma& Group. Let us work together to conduct our business in accordance with the code of conduct to protect the reputation and trust, and thus impact the continued success of the pharma& Group.



Frank Rotmann
Founder and Managing Director



Elmar Zagler
Founder and Managing Director

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1. Scope of Application

In our Code of Conduct, we have summarized binding rules of conduct that we expect all companies in the pharma& Group to adhere to.

With this code of conduct, we address all people employed by the pharma& Group under an employment contract, but also all those employed by the pharma& Group based on another legal relationship, such as a consultant, sales representative, or temporary worker contract.

For us, it is understood that all people involved in the various group companies follow the laws and regulations of the countries in which they operate and reliably fulfil their obligations. They must demonstrate honesty and fairness in all aspects of their business operations.

We expect ecological and social responsibility towards our own Company, and towards customers, suppliers, and other business partners.

2. Integrity & Compliance with Legal Framework

The integrity of each individual is essential if we want to maintain the trust of our customers, suppliers, and owners. In addition, this is the only way we can avoid significant legal and economic risks. We are fully committed to acting with integrity and complying with the law. We would rather forego a deal and achieve an internal goal than violate applicable law.

We comply with existing laws, official regulations, and internal company guidelines. If national laws have stricter regulations than our internally standardized regulations, national law takes precedence.

It is understood that we protect our assets, manage them carefully, and do not use or appropriate them improperly or illegally for our own purposes. Monetary and material resources that are stolen, embezzled, or misused from our company harm us all.

3. Respecting the Independence of the Scientific Community

Science benefits greatly from a community that approaches problems in a variety of creative ways. A diverse community can better generate new research methods, explanations, and ideas, which can help science overcome challenging hurdles and shed new light on problems.

The independence of research is a key strategic issue in modern societies. Science has become a major source of wealth and is increasingly seen as a possible source of solutions to the survival problems of contemporary societies.

At the pharma& Group we highly value the independence of science, we respect the dynamics of its research technologies, and we foster the growth of science.

We respect the scientific community's independence. We do not inappropriately influence their opinion to favor pharma& Group products.

4. Putting Patients First

How patients perceive and experience their care is important.

At the pharma& Group, we take patient-centered care seriously. It means we are placing our patients at the centre of what we do. Patient care is why we are here.

The pharma& Group aims to provide care that is respectful of, and responsive to, individual patient preferences, needs, and values, and we ensure that patient values guide all clinical decisions.

Patients are people: we listen to their concerns, we try to understand them, and we respect their needs and their situation.

5. Commercialization of Products and Services

At pharma& we are constantly trying to breathe new life into proven medicines. We promote innovation, and our aim is working with all stakeholders to secure the long-term success of our company.

We make sure that the commercialization of our products and services is guided by the highest ethical standards, we are acting with integrity and we are always seeking compliance with our industry's laws and regulations and industry codes. Our communication is not misleading, balanced and accurate.

Through specific programmes we try to ensure also that patients in need get easy and affordable access to specific products and services. We are committed to become a trusted business partner to patients and also to all our other stakeholders.



6. Environment & Climate Protection

Our environment is important to us. That is why we take environmental protection extremely seriously and are committed to complying with all environmentally relevant laws, regulations, and official requirements. Beyond this minimum standard, we continually work to improve environmental performance. We want to reduce and avoid environmental pollution caused by our activities at production and office locations as much as possible using the best available technology with economically justifiable effort.

To an even greater extent than we are doing today, we want to use raw materials that protect natural resources and whose use makes sense from both ecological and economic, as

well as national economic considerations. We operate actively environmental and waste management systems to monitor and minimize environmental impacts, especially in the areas of emissions and waste treatment.

We motivate our employees to act in an environmentally conscious manner and involve them in measures to improve environmental standards. In addition, we take precautions to ensure that the contractual partners working on our premises behave in accordance with our environmental policy.

Since 2022, we present our efforts to achieve sustainability goals in the areas of environment, social, and governance in an annual report, the pharma& Group ESG report.

In 2024, we joined the "United Nations Global Compact" partnership program to continue to work actively on local and global environmental and climate protection goals.

7. Health, Safety and Equal Treatment

The pharma& Group attaches foremost importance to ensuring that our employees can work in a non-discriminatory and safe environment. We promote an environment characterized by mutual respect, appreciation, and tolerance. We do not tolerate discriminatory or disrespectful behavior. We promote equal opportunities, prevent discrimination when hiring employees, and promote and offer training and further education measures. We treat everyone equally, regardless of age, gender, skin color, ethnicity, sexual identity, disability, religion, or belief.

We assume our responsibility regarding health and occupational safety because the safety and health of our employees are our top priority. Occupational safety and health protection are part of all operational processes, and each

individual is obliged to avoid risks to people and the environment, to minimize environmental impact, and to use resources sparingly. Legal and internal requirements for occupational safety and health, fire, and environmental protection must be adhered to.

We respect internationally recognized human rights and are particularly committed to complying with the UN Charter of Human Rights and the ILO core labor standards of the International Labor Organization (ILO). We strictly reject any form of forced labor and child labor. The right to appropriate remuneration is recognized for all employees. Remuneration and other benefits correspond at least to the respective national and local legal standards.



8. Avoiding Conflicts of Interests

In everyday working life, situations can arise in which personal interests conflict with those of the company. In the worst case, these conflict situations can even negatively impact the fulfillment of our duties and tasks.

Our actions are always based on the interests of the company. All employees are requested to avoid situations in which their personal and/or commercial interests come into conflict or could come into conflict with the interests of the

pharma& Group. We avoid situations that give the impression that our personal interests could influence our business decisions. However, such conflicts of interest cannot always be ruled out. We disclose possible conflicts of interest to our superiors immediately and in full without being asked to do so. In this way, we ensure appropriate transparency and an adequate solution to conflicts of interest.

9. Taxes

Tax administrations collect taxes and fees established by federal laws and regulations.

pharma& understands that governments need revenues to meet their responsibilities. pharma& is fully committed to contributing its share to finance these government services. We ensure that taxes, fees, and other financial charges are paid in full, on time and always in accordance with applicable laws and regulations.

pharma& is aware of the international standards for responsible behavior in the tax area and supports measures for greater tax transparency and tax justice. As a company, we will never take any measures anywhere against the fight against tax inequalities.

10. Rejection of Corruption and Bribery

Corruption is generally understood to be the abuse of entrusted power for private benefit or advantage in both the public and private sectors. Corrupt behavior can have profound consequences for our Company and each individual, but also ultimately damages society. We do not tolerate corrupt or white-collar criminal behavior in connection with all types of business activities and our entrepreneurial actions and activities.

Our independence and inability to be influenced is essential for our business activities. Therefore, we avoid all circumstances that could influence our independence or even give the appearance of an influence.

This means that we do not grant, promise, or accept any direct or indirect advantages that are likely to unduly influence decision-making processes or business activities or even create the appearance of such an influence. Corporate interests and private interests must be strictly separated from each other. Only business-standard gifts and gifts of low value are unproblematic. The offering and acceptance of monetary gifts and benefits of value are never accepted.

We carefully pay attention when dealing with public and healthcare officials, and we always strive to adhere to our industry's principles

as laid out for instance by the International Federation of Pharmaceutical Manufacturers and Associations (IFPMA), the European Federation of Pharmaceutical Industries and Associations (EFPIA) or similar national norms of conduct and ethics.

We adhere to internal anti-corruption guidelines and our processes for dealing with gifts and invitations. Questions of doubt regarding both benefits received and given must be clarified in advance with superiors or the compliance organization.



11. Selecting Business Partners

Business partners such as suppliers, customers, research organizations, consultants, or representatives are part of our business activities and are carefully selected by us. We work with our business partners fairly and transparently and expect the same level of transparency and integrity from them.

Actions by business partners can be attributed to the pharma& Group. When initiating new business relationships, it is essential to obtain sufficient information to assess the integrity and

trustworthiness of the business partner. Public sources or registers as well as the request for references, self-declarations, and evaluations, can be used for this purpose.

To ensure fair treatment of all our business partners, a transparent business basis and appropriate remuneration are a matter of course for us. Therefore, no disproportionate commissions or fees may be agreed upon or paid out.



12. Fair Competition

We are committed to fair competition as the basis of our business activities. We expect compliance with applicable national, European, and international competition and antitrust law rules from our employees and business partners alike.

We do not undertake any activities that restrict fair competition. We do not make any agreements with competitors about prices, other conditions or agreements on the division of markets, customer segments or products. Likewise, we do not pass on confidential information that would likely restrict or distort fair competition, and we expressly reject any unfair competition practices.

We also behave fairly towards suppliers, customers and other business partners and do not impose undue restrictions on their market presence. In markets where we hold a dominant position, this position will not be abused.

Protection of Intellectual Property Rights

The pharma& Group respects all intellectual property rights (IPR) of third parties and will never intentionally violate third parties' IPR. However, to ensure that the pharma& Group's intellectual property rights are and stay safe, we will always actively defend our investments in our IPRs against any third parties that infringe our patents, trademarks, design, and trade secrets. aso. ...

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13. Donations and Sponsorship

We see ourselves as active members of society and are, therefore, involved in different ways. Donations and sponsorship activities may only serve company interests and must strictly be separated from private interests. Such activities may not be offered or granted in return for the performance of the duties of a public official or a decision made by a company or healthcare representative.

We do not make any financial contributions, particularly donations and sponsorship measures, to political parties at home or abroad, individual elected officials or candidates for political office. Furthermore, we do not participate in projects violating laws, accepted standards or our values and principles.

We are especially aware of the rigorous laws and regulations within the pharmaceutical industry. When doing business, we adhere strictly to the various national and regional pharmaceutical codes of conduct.



14. Responsible Communication

We are committed to responsible and appropriate communication. Trust in our company is guaranteed through continuous and honest communication. Therefore, we attach great importance to transparent and truthful reporting and communication about the Company's business transactions to investors, employees, patients, business partners, the public, and government institutions. Each individual ensures that both internal and external reports, records. Other documents of the pharma& Group are in accordance with the applicable legal rules and standards and are, therefore, always complete and correct.

Social Media

We act and communicate responsibly in social networks and online communities. Here, too, we do not pass on any confidential information and do not make any statements that could damage the reputation of the pharma& Group. Every individual should be aware that they can also be perceived as part of the pharma& Group in their private life and is therefore required to protect the reputation of the Company through their behavior and appearance when using social media in a personal capacity.

Company information to the public and official statements are only published by approved individuals.



15. Protection of Data and Information

Data and information are valuable assets. We only process personal data within the legally permissible framework. We are aware of the high sensitivity of the personal data of our customers, patients, employees, shareholders, suppliers, and investors entrusted to us.

The security of personal data, confidential information, and business and trade secrets can directly affect our business success and public

reputation. We, therefore, protect personal data and confidential information against loss, unauthorized misuse, or unintentional destruction by careful and responsible handling and using all technical and organizational means at our disposal. For this purpose, we adhere to pharma& Group's internal IT guidelines.

Applicable policies:



16. Cooperating with Investigations

Cooperation with law enforcement agencies and other authorities is an important element of the strategic response by pharma& to regulatory proceedings, corporate crime investigations and prosecutions.

The pharma& Group is committed to (voluntarily) cooperating with authorities if it is helping to address risks. At the same time, it is vital to tread carefully to not disclose information that could be commercially or legally damaging to our company or staff.

The process is complicated because the approach to cooperation amongst authorities varies across jurisdictions.

In the event the pharma& Group or any of its employees is confronted with a situation where an authority of whatsoever kind is approaching pharma& physically or otherwise, the employee must stay calm, should immediately call the national hotline (or the pharma& Group compliance department) to seek advice and then act accordingly.



17. Reporting Violations

Everyone is required to inform their superiors, the human resources department, or the compliance organization if there are violations of the code of conduct. In cases that may affect the local management itself, only the compliance department should be contacted.

Reports can also be submitted anonymously via the pharma& Group whistleblower online system. The compliance organization carefully examines every incoming report and treats them as confidential.

We guarantee special protection and support to every individual who honestly reports an issue. This also applies if a reference has proven incorrect in terms of content, provided the reference was given in good faith.

Consequences of Violations

Violations of the rules of conduct and principles standardized here cause lasting damage to us and can result in various consequences and sanctions for the pharma& Group. On the one hand, this includes financial and criminal consequences, which may have negative consequences for the entire pharma& Group and the individual.

The pharma& Group therefore acts in the event of any violation of the provisions of the Code of Conduct and responds appropriately to clarify the matter.

Failure to comply may result in criminal, civil, and/or labour law measures.



18. Support & Advice

Employees who need advice and assistance regarding the pharma& Group code of conduct, please seek support from these offices and people:



with superiors or line managers

compliance department

compliance@pharmaand.com

human resources department

humanresources@pharmaand.com



with superiors or line managers

compliance department

compliance@pharmaand.com

human resources department

humanresources@lobabiotech.com

or use the pharma& whistleblower tool available at pharmaand.com



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