Code of Conduct

CordenPharma

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President & CEO Message

Dear Colleagues,

CordenPharma brings together colleagues from many different backgrounds working at our different sites and legal entities in a common organization across the world. We offer high quality development and manufacturing services for Intermediates, Excipients, APIs and Drug Products to customers and ultimately patients and must operate with a common understanding of fundamental behaviors.

This firstly relates to our external contacts: customers and their patients, suppliers, authorities, neighbors and other stakeholders must be certain that we will always fulfill our business responsibilities, irrespective of the particular site and legal entity they are currently in contact with.

But internally too, accepted rules of behavior make us stronger as a team and ultimately ensure that we reach our joint objectives as an organization. This applies both to the supervision of customer projects and products spanning a number of entities across the network and to the managerial approach taken by line managers.

This Code of Conduct outlines the fundamentals essential for achieving these results. Please read the document carefully and let these rules be the principles guiding your daily work routine. You'll be helping to ensure that CordenPharma and its personnel are regarded as trustworthy partners around the world.

Thank you for taking responsibility by following this Code of Conduct and living its principles.

Yours sincerely,

M. Quirmbach

Dr. Michael Quirmbach
CEO & President, CordenPharma Group

Introduction

This Code of Conduct is intended to support you as an employee at CordenPharma to behave in a legally and ethically irreproachable manner in your daily work routine. It is part of our comprehensive Compliance Management System (CMS).

We base our daily actions on the following core values:

- → Integrity
- → Accountability
- → Trust
- → Collaboration
- → Reliability

Based on our core values, the Code of Conduct creates mandatory principles. These principles are all-inclusive: it defines the fundamental ethical and professional standards that we expect of all individuals working for CordenPharma.

All managers and employees (all together «employees») worldwide must ensure that their conduct in carrying out their duties is in line with this Code of Conduct and with applicable laws and regulations. Managers must ensure that the staff reporting to them are familiar with the content of this document.

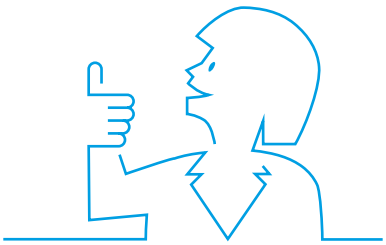
We fundamentally trust the overall professionalism and integrity of our personnel. This document should therefore not be viewed as a detailed set of instructions covering every eventuality, but instead as a framework to guide reasonable behavior.

If, on a case-by-case basis, laws, internal group or site regulations or labor law agreements define requirements which go beyond the rules of this Code of Conduct, these latter requirements are to be viewed as binding. If, on the other hand, the Code of Conduct or other internal requirements of CordenPharma set requirements which are more stringent than those defined by law, the internal guidelines will take precedence.

The Chief Quality and Compliance Officer at Group level coordinates any activities associated with this Code of Conduct and is available at any time to offer expertise and support. Relevant training is offered to all employees on a regular basis and upon demand if needed. If there is any doubt, advice from the Chief Quality and Compliance Officer should always be obtained.

If you have reason to believe that this Code of Conduct has been or is being violated, it is your responsibility to immediately raise this with the appropriate person, such as your supervisor or the Chief Quality and Compliance Officer. Complete confidentiality and anonymity is ensured. Retaliation against anyone who raises a concern honestly and with good intentions is not tolerated.

If proven, violations may lead to disciplinary measures up to and including dismissal in the context of applicable labor laws.



1. Integrity

CordenPharma considers itself and its employees as reliable, trustworthy employees and business and contractual partner. Our activities are determined by integrity. We observe the laws and regulations applicable to our business worldwide, as well as ethical framework conditions. The management of CordenPharma acts as role model in following this Code of Conduct.

Our suppliers and other business partners who are working on our behalf or acting in our name, through outsourcing of services, processes or any other business activity, are requested to follow this Code of Conduct.

2. Customer Centricity & Service

At CordenPharma, customer centricity means surpassing our customers' expectations by anticipating what more they might need to successfully complete their project, what angle they may have overlooked, or what solutions they may further request – and being prepared to deliver it to them.

We have a holistic outlook on markets and customers with the aim of creating the solution which adds the greatest value.

3. Collaborative Partnerships

Our unique structure enables us to offer customers from the most varied target segments a wide range of relevant products and solutions. For our customers, partnership means that we actively cooperate to develop the best solution to each project.

We make use of the diversity of available knowledge within the group to increase customer satisfaction, offer customers additional options.

We cultivate a cooperative relationship by providing truthful information, treating contacts as equals and handling criticism constructively. Our goal is always to develop long-term relationships on a partnership basis.

Working in partnership within our corporate family means we can draw optimum benefit from our unique combination for our customers.

Our approach to every project begins with fostering a continuous exchange between applicable project teams and customers for ongoing alignment. We carefully assign the appropriate amount of time and resources to each phase of development, while monitoring all tasks to ensure projects progress in a controlled and timely way.

We support one another at all levels. This applies not only in our own workplace but also across entities and geographic frontiers. This offers all the individual companies access to numerous skills, technologies, processes and plants which may complement their own capabilities.

We exchange information where this is in our common interest. We are open to new ideas and opportunities, irrespective of their origin.

4. Product Quality

We pursue professional quality management and a global quality system with the claim that our products and solutions always fulfill or exceed customers' and regulatory expectations.

We provide adequate information to everyone involved to ensure that our products are safe during production, handling and transport. Legislative and internal product quality must be followed at all times.

5. Transparency

Transparency is the basis for mutual trust. Current data and a willingness to enter into an open dialogue are indispensable for effective internal collaboration and dependable relationships with external partners.

We therefore ensure that we document relevant information methodically, make it available to other legitimately interested parties and use it as the basis for shared learning processes.

Accounting, Documentation, Reporting

We fulfill all statutory and other duties relating to accounting and documenting business processes. This includes establishing effective processes and internal controls for financial reporting and for publishing information in line with disclosure requirements. Our reporting procedures completely, clearly and traceably record and accurately present relevant processes and facts. We provide our customers as contractually agreed with reliable and timely reports and analyses. In so doing, we address actual, potential or foreseeable deviations or risks at an early stage so that the most effective strategic solutions can be developed.

Positive Error Culture

We are proud of our performance and celebrate our successes. We view errors and failures as opportunities to improve.

The consequences and results of our business activities are therefore neutrally and honestly evaluated, analyzed and presented, ideally with reference to target parameters (KPIs). When discussing negative developments, we focus on identifying sources of error and opportunities for future improvement.

Communication with Stakeholders

CordenPharma maintains an open dialogue with relevant stakeholders such as the communities neighbouring our production plants, media, supervisory authorities, policy makers or NGOs. This is because transparency is here too the basis for mutual trust. We accordingly always attempt to keep exchanges and debates objective, truthful and solution-focused.

Sales, Marketing & Advertising

We comply with statutory requirements and relevant codes of practice and voluntary undertakings in sales, marketing and advertising. We present our services and products truthfully and factually. The same applies to competitors' services and products where comparisons are legally admissible.

6. Environmental Impact

We use natural resources as efficiently as possible in all operating procedures and minimize emissions and waste volumes. We achieve this by using risk assessment, technical solutions as well as smart processes and work procedures. Environmental legislation, regulations and work instructions are strictly followed. We furthermore encourage all members of staff to minimize the environmental impact of their personal behavior in their daily work routine.

All resources may only be utilized for commercial purposes within the scope of approval granted by responsible authorities. The same applies to the construction, operation, modification or extension of production facilities. Environmental legislation, regulations and work instructions are strictly followed.

Any illegal leakage of substances must be avoided. Waste must be disposed of in accordance with the legal provisions. If the services of third parties are utilized, it must be ensured that they also comply with the environmental regulations and our standards within the company.

7. Safety & Health

Our employees are our most valuable asset. Their skills, competence and creativity, and their willingness to accept change, continuously open up new growth opportunities for our company. For CordenPharma it is important that employees operate in a positive and safe work climate in which they can develop their capabilities.

As a group active in the sector of manufacturing of intermediates, Active Pharmaceutical Ingredients (API) and Drug Products (DP), we uncompromisingly meet our particular responsibilities in terms of plant and occupational safety. Management provides suitable processes to ensure that buildings, plants and other facilities fulfil all relevant safety criteria. The same applies to our personnel's working environment and conditions. We always fully comply with all legislative and other requirements in this respect.

Within their personal working environment, each individual bears joint responsibility for protecting themselves, colleagues and the environment by behaving safely. Safety guidelines such as operating rules, handling instructions, rules regarding personnel protection equipment or traffic regulations must be followed at all times. So that we can continuously raise safety levels, all members of staff are encouraged to report any safety shortcomings and proactively suggest improvements.

8. Global Labour Standards & Human Rights

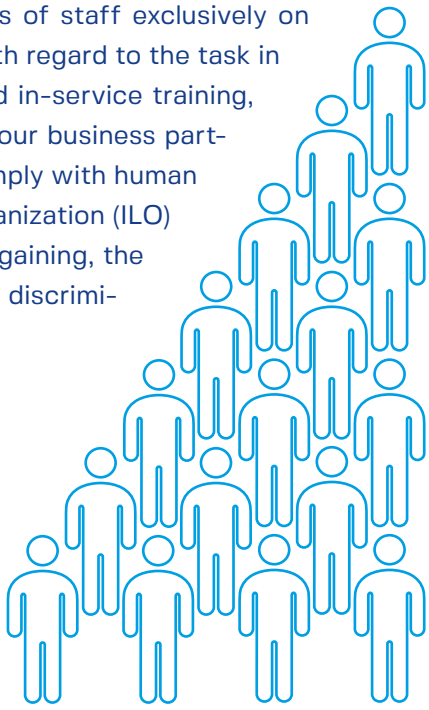
We consider ourselves bound by the Universal Declaration of Human Rights and the principles of the International Labour Organization (ILO). We are categorically opposed to child and forced labour. All members of staff are entitled to fair, unprejudiced and respectful treatment.

The knowledge, abilities and motivation of our colleagues are the foundation of our long-term business success. Therefore, we put structures and processes in place to enable employees in every entity to develop both professionally and personally within CordenPharma. All managers have a responsibility to support the members of their teams in achieving this.

We respect the right of our personnel to join unions and/or other employee organizations and to bargain collectively. Employees are protected from discrimination and receive the support they require to perform their function.

We provide a working environment which is free of discrimination, bullying and harassment. We do not tolerate staff or colleagues being disparaged on the basis of their race, skin color, language, gender, religion, political or other outlooks, age, sexual orientation or other personal features. The same applies to harassment, in particular of a sexual nature. Our managers have a duty to put a stop to and take disciplinary actions.

We decide to employ applicants and promote members of staff exclusively on the basis of their performance, abilities and potential with regard to the task in hand. This principle of equality also applies to initial and in-service training, remuneration and the assignment of duties. We expect our business partners and in particular our suppliers to recognize and comply with human rights and the principles of the International Labour Organization (ILO) – the right to freedom of association and collective bargaining, the abolition of child and forced labor and the prohibition of discrimination in the workplace.



9. Corporate Assets & Intellectual Property

We fundamentally treat company property with care, use it as intended and take reasonable steps to protect it from loss, theft, damage and access by third parties. Employees use company assets exclusively for business purposes except where private use is explicitly permitted. Assets include locations, equipment, financial facilities, trade secrets, patents and trademarks.

We ensure that our customers' and our own intellectual property does not pass into unauthorized hands or is not misused. Where possible, we obtain effective legal protection for our new developments and ideas by filing for patents, trademarks, brand names or other suitable forms of protection. We faithfully respect corresponding rights held by our customers.

In particular in the context of custom manufacturing projects, employees of CordenPharma frequently obtain access to customers' patented technologies or other intellectual property. Using appropriate processes and technologies, we ensure that this information is not made accessible to third parties without our customers' explicit consent.

10. Confidential Information

Employees and our consultants may acquire confidential information relating to our operations. Such information includes but is not limited to business strategy and development documents, balance sheet data, manufacturing and testing procedures, cost calculations, contracts of all kinds and information about customers, suppliers and other business associates. All personnel are obliged to maintain secrecy regarding confidential information both during and after their employment within CordenPharma.

Confidential information is exclusively used for business purposes for the benefit of CordenPharma and must not be passed on or repeated to anyone, inside or outside CordenPharma, unless they are authorized to receive such information. We ensure that such data is at all times securely protected from access by unauthorized colleagues or external third parties.

11. Data Protection

We treat data records transferred to or created by us with the greatest care to prevent unauthorized access, basing our procedures on the General Data Protection Regulation (GDPR) or comparable legal standards.

12. Electronic Means of Communication

«Electronic means of communication» are taken to mean company-owned devices such as smartphones, laptops or tablets together with the IT infrastructure and specific applications for internal or external collaboration such as collaboration platforms, email, chats or social media.

In principle, the only electronic means of communication we use for business purposes are those which meet the technical standards of CordenPharma. New technology services, systems and platforms as well as software and means of communication operated by third parties must be checked and approved by the appropriate in-house service before being used.

In general, reasonable personal use of electronic means of communication is admissible subject to applicable rules and instructions, providing no other restrictions apply.

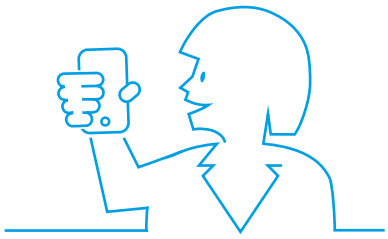
Electronic means of communication must be used with due care, in particular in order to prevent third party access to data. Notify your local IT function if a device is lost or stolen or if unauthorized data access is suspected.

13. Social Media

The creation and operation of external social media channels for employees of CordenPharma is in principle the preserve of the Marketing department. Members of staff with social media responsibilities must be appropriately trained and their duties include continuously monitoring the channel in question.

Employees are free to use private social media channels. Please nevertheless be aware that the manner in which you present yourself may have an impact on the public perception of your employer and act accordingly. If in doubt, consult CordenPharma's Marketing department before publishing a post.

Strict regulation and a requirement for a minimum level of information often apply to communications relating to our products. We encourage our employees to share our corporate content. Independent private posts about our products are not permitted without prior approval by CordenPharma's Marketing department.



14. Gifts & Entertainment

Gifts and invitations are a normal expression of personal or professional ties in day-to-day business. They can, however, be misunderstood or interpreted as an attempt to exert undue influence. Consequently, no gifts, entertainment or other benefits may be accepted or offered which might cast doubt on an individual's personal integrity or the integrity and independence of CordenPharma and his business partners.

Gifts, invitations or services may be accepted or offered providing they are in line with the law, CordenPharma's internal pre-authorization procedures and conventional business practice, are ethically unassailable and are made completely transparent. Such benefits must in no way influence the decision-making or behavior of the involved parties. Particular restraint is required with public officials as well as state-owned enterprises when it comes to offering gifts and invitations.

CordenPharma does not actively contribute (directly or indirectly) to political parties, or organizations or individual politicians. Any donation must fall within the legal limits. This also applies to sponsoring activities.

15. Corruption

We are successful on the market in fair competition thanks to our abilities, products and services. Attempts to achieve competitive or other advantages by dishonestly influencing third parties are inadmissible. Business decisions must in principle be made in the best interests of the company which the member of staff is representing. Personal relationships or benefits from business associates must play no part.

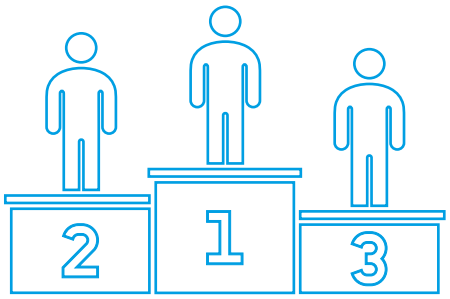
The direct or indirect offering, payment, soliciting or acceptance of bribes in any form is prohibited. No benefit (cash or otherwise) that could be interpreted as a bribe shall ever be offered to, promised to or accepted from an individual or organization with the express or implied condition of gaining a commercial advantage. Facilitation payments to influence an individual are also bribes and should not be paid.

16. Conflicts of Interest

A conflict of interest arises when an employee's personal interests might be inconsistent with those of the employer. We therefore expect our staff to maintain a strict separation between their business and private interests and not to allow any conflicts of loyalty to arise. Private interests must never influence business decisions and even giving any impression of such influence should be avoided.

Neither an employee nor a member of an employee's immediate family should have business, financial or other relationships with CordenPharma, customers, suppliers, employees (present or prospective) or competitors that might impair, or appear to impair, the performance of the employee's responsibilities towards CordenPharma.

Existing or foreseeable conflicts of interest must be disclosed to your manager so that the subsequent course of action can be jointly discussed.



17. Free Competition

We are convinced that free and fair competition is the basis for prosperity and positive social development. Our employees accordingly strictly comply with applicable competition legislation.

Informal meetings, arrangements or de facto collaboration with competitors which attempts to lead to a restriction of free competition are inadmissible. The appearance of such a business behavior shall also be avoided.

Equally, we will not unduly restrict our suppliers or customers in their business dealings. Employees must ensure that they do not use commercial strategies that may abuse a dominant market position.

Contracts which might have an impact on competition must be discussed with the legal department and the Chief Quality and Compliance Officer.

18. Foreign Trade & Trade Controls

As a global group, we are committed to comply with the laws of all jurisdictions in which we do business, including laws and regulations regarding sanctions, embargos and trade restrictions («Sanction Regulations»). For products which are subject to special import or export restrictions, we ensure that all necessary registrations, licenses and authorizations are in place.

When purchasing, manufacturing or circulating goods or purchasing or transferring technology, we comply with trade control requirements. This applies in particular to the provisions on handling dual-use products, combating terrorism and chemical weapons.

Sanction regulations provide countries with legal control over the sale, shipment or transfer of goods and services across national borders including capital movements and payments. Export controls and sanctions may be imposed on countries, sites, legal entities and natural persons or goods and services.

We do not do business, whether directly or indirectly, in countries, with companies or with individuals on whom a legally binding embargo has been imposed. This also applies to companies and individuals who might act as intermediaries in this respect.

19. Money Laundering & Funding of Terrorism

CordenPharma supports the battle against money laundering and the funding of terrorism. Our employees never carry out or tolerate actions in their working environment which violate national or international legislation or other rules for combating money laundering and the funding of terrorism. We comply with current regulations for recording financial transactions.

In order to generally minimize the risk of becoming involved in money laundering, the members of CordenPharma only enter into business relationships with trustworthy companies, organizations and individuals. If necessary, appropriate investigations must be carried out. We reserve the right to check the background of a business partner in case of new business relationships.

We transfer money only for supplied and duly registered goods and services to natural and legal persons whose identity we know.

Movements of cash are not usual in business dealings and must therefore be scrutinized with a critical eye. Where appropriate, our employees must inform themselves about the applicable threshold values for cash payments in countries in which CordenPharma does business.

Corden
Pharma

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International

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Peptides

Oligonucleotides

Lipids & LNPs

Injectables

Highly Potent
& Oncology

Small Molecules

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