



Business Partner Code of Conduct

Foreword

Pharmanovia's success depends on what we achieve and how we achieve it. Ethical conduct, compliance with applicable law, integrity and individual accountability build the trust of patients, customers, regulators, employees and business partners. This Business Partner Code of Conduct sets out the minimum standards we expect every Business Partner to follow when working with or on behalf of Pharmanovia.

Pharmanovia expects and requires all its Business Partners to recognize these values, to take these values as the basis for their own business decisions and to conduct their business according to these values. For this reason, Pharmanovia expects all its Business Partners to comply with the standards of conduct set out in this Business Partner Code of Conduct and ensures that they are contractually bound to do so.

Signed by:

098BDCAC172B409...

Stephan Eder

Chief Executive Officer

September 2026

Our Business Principles

For the purposes of this Code, “Business Partner” means any supplier, contractor, consultant, agent, distributor, service provider or other third party that provides goods or services to, or acts for or on behalf of, Pharmanovia. Business Partners must communicate the applicable requirements of this Code to their personnel and relevant subcontractors and must take reasonable, risk-based steps to promote and verify compliance throughout their supply chains.

Pharmanovia expects all its Business Partners to behave and act in accordance with the rules in order to avoid economic damage and harm to Pharmanovia's reputation. Any breach of this Code of Conduct may have serious consequences.

Pharmanovia will sanction any misconduct or violation of laws, regulations, practices, policies, rules and procedures, principles, processes, and generally accepted ethical and compliance standards. In doing so, Pharmanovia will not take into account the importance of the Business Partner to Pharmanovia.

The Business Partner shall ensure that all its representatives, employees, freelancers, own Business Partners and consultants comply with this Business Partner Code of Conduct by acting at all times and in all places in accordance with this Business Partner Code of Conduct and all Rules and by cooperating in full transparency when a (potential) breach of these principles may occur.

This Business Partner Code of Conduct establishes the minimum standards applicable to all Business Partners and their representatives. Business Partners must also comply with all laws and regulatory requirements applicable to their activities and the jurisdictions in which they operate. Where applicable law and this Code address the same subject, the more stringent requirement should be followed unless doing so would breach applicable law.

Compliance with the requirements of this Business Partner Code of Conduct may be regularly reviewed, e.g., by internal or external auditors. If at any time a (potential) breach of this Code of Conduct is suspected or known, the business Partner must immediately inform Pharmanovia of the (potential) breach and provide all information related thereto. The Business Partner is obliged to support Pharmanovia as well as to take all own measures necessary to remedy a (potential) breach of this Code of Conduct and/or to prevent such a breach.

Pharmanovia has a high internal demand on the integrity of its actions and behaviour. Pharmanovia and all its Business Partners are obliged to comply with all rules. This principle of compliance with the rules applies explicitly even if Pharmanovia and/or one or more Business Partners would gain (alleged) advantages by violating one of the rules.

SAFETY, HEALTH AND THE ENVIRONMENT

Product quality and patient safety

Business Partners whose activities may affect the quality, safety, efficacy, identity, strength or purity of medicines or other regulated products must comply with all applicable laws, regulatory requirements, quality agreements and recognised good practice standards. They must maintain appropriate quality systems, controls, records and trained personnel; promptly notify Pharmanovia of actual or suspected quality defects, falsification, counterfeiting, diversion, tampering, contamination, data-integrity concerns, adverse events, product complaints or other matters that may affect patient safety; and cooperate fully with investigations, corrective and preventive actions, recalls and regulatory enquiries.

Health and Safety

Business Partners must provide a safe and healthy working environment and comply with all applicable occupational health and safety laws. They must identify and assess workplace hazards; implement appropriate engineering and administrative controls and personal protective equipment; maintain process-safety and exposure-control measures where relevant; provide suitable training; and establish procedures for emergency prevention, preparedness, response, investigation and remediation. Workers must be able to raise safety concerns and remove themselves from imminent danger without retaliation.

Emergency Planning & Response

Potential emergency situations that could impact the workplace or company shall be identified and preventive measures and training implemented to be prepared to execute emergency plans and response procedures if needed.

Environmental Stewardship

Business partners are expected to operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment and should encourage their suppliers to do the same. To achieve this, our partners shall:

- Quantify their environmental impact of their own operations and in the value chain (e.g., the amount of water used, waste generated, energy consumed, and greenhouse gases (GHG) emitted, impact on biodiversity). This information shall be made available to Pharmanovia for review when requested.
- Take reasonable measures to protect nature and reduce their ecological footprint. Implement programs to reduce environmental impact, including GHG emission reduction, water conservation, reuse and recycling of materials/waste, avoiding the use of hazardous materials where feasible, and reducing the impact on biodiversity.
- Have systems to safely handle, store, recycle, and manage waste, air emissions, and wastewater. Any harmful waste or emissions must be treated before being released into the environment. This includes managing releases of active

pharmaceuticals into the environment (PiE).

- Have systems in place to prevent, report, and mitigate accidental spills and releases into the environment.
- Ensure responsible product use by providing clear instructions and warnings to ensure safety and efficacy.
- Manage product end-of-life by implementing proper disposal and recycling practices to minimize environmental impact.
- Promote customer health and safety by ensuring products do not pose risks during use and disposal.
- Engage in environmental services and advocacy to promote sustainable practices and policies and encourage suppliers to do the same.

Facilities and Equipment

Appropriate equipment, facilities, and services should be provided to support worker safety, health, and well-being.

Hazard Information and Training

Safety information relating to hazardous materials – including pharmaceutical compounds and pharmaceutical intermediate materials – shall be made available to be used to educate, train, and protect workers from hazards.

Housing Standards

Business partners that provide housing or living accommodations for workers shall ensure that local housing and safety standards are met.

Process Safety

Risks from chemical and biological processes shall be identified and programs and procedures will be in place to prevent or mitigate catastrophic incidents associated with operations.

Substances of Concern and Producer Responsibility

Substances of concern contained in business partner products shall be identified and disclosed to Pharmanovia including their products, components or other materials supplied to Pharmanovia and its operating subsidiaries, affiliates and divisions. Business partners will also comply with extended producer responsibility requirements, where regulated in the countries or regions in which those substances are used, and provide requested information to Pharmanovia for compliance reporting purposes. Substances of concern include but are not limited to carcinogens, mutagens and reproductive toxins (CMR), endocrine disruptors (ED), persistent, bioaccumulative, very persistent, very bioaccumulative and toxic materials (PBT/vPvB), phthalates and heavy metals.

Transportation and Shipping

Procedures shall be in place to ensure Pharmanovia goods are transported in a compliant manner that will minimize the environmental footprint of all shipping activities. This includes consideration of transportation modes and distances as well as packaging material types and quantities.

Worker Protection

Programs and procedures should be in place to protect workers from

overexposure to chemical, biological and/or physical hazards in the workplace.

Ecological Responsibility and Sustainability

Pharmanovia has implemented high standards to meet its environmental responsibility in the conduct of its business. Pharmanovia expects all Business Partner to fulfil their own ecological responsibilities in an appropriate manner. This includes, among other things, the implementation of internal rules and procedures that go beyond mere compliance with legal environmental regulations and protect the environment to the extent that it is economically justifiable for the Business Partner, but in any case, to the extent required by law.

Sustainability and acting accordingly is also a special concern for us in our supply chain. We expect our Business Partners to ensure and verify compliance with the guidelines of this Business Partner Code of Conduct in your supply chain.

We assume that you not only commit your own Business Partners to compliance in writing but also monitor this through regular and ad hoc audits. The same applies to the obligation of your Business Partners to commit their Business Partners to compliance with the guidelines of this Business Partner Code of Conduct; whereby this obligation is to be passed on from Business Partner to Business Partner and compliance with it is to be monitored regularly and on an ad hoc basis.

HUMAN CAPITAL

Human Rights, Labour and Employment

Pharmanovia supports and respects the protection of international human rights as laid down in the United Nations Declaration of Human Rights and the fundamental conventions of the International Labour Organisation. Pharmanovia explicitly rejects child labour, forced labour or labour favoured by human trafficking and makes this a criterion in the selection of its Business Partners and business partners.

Business Partners of Pharmanovia must comply with all applicable Supply Chain Laws including, but not limited to, the UK Modern Slavery Act, German Supply Chain Act and similar legislations in force globally. In addition, Business Partners must also comply with the EU Conflict Minerals Regulation (EU) 2017/821 and the European Corporate Sustainability Reporting Directive (CSRD) as soon as these directives are finally implemented.

We expect that all of our Business Partners uphold the same human rights of individuals and will treat all workers with respect and dignity.

Working Conditions

Business Partners must ensure fair working conditions both in your company and with your business partners. Ensure compliance with all applicable legal rules on fair pay, in particular compliance with applicable minimum wages, social security contributions and social benefits, as well as compliance with all applicable laws on working time.

Benefits

Workers shall be provided with all benefits mandated by applicable labour laws, including but not limited to the areas of paid leave, Social Security, retirement benefits, and maternity/paternity leave.

Child Labour & Young Workers

Child labour shall not be used. The employment of young workers under the age of 18 must comply with all relevant laws and regulations related to age restrictions, working hours, fair compensation, and health and safety.

Employment Practices

Only recruiters (agencies) that comply with local labour laws shall be used. Partners and recruiters acting on their behalf will not: (i) withhold or prevent a worker from accessing his or her identity or immigration documents or (ii) charge workers recruitment or placement fees.

Social Dialogue

Dealing with the interests of employees in a spirit of social partnership, we expect our Business Partners to guarantee freedom of association and collective bargaining.

Diversity, Equality, and Inclusion

Pharmanovia stands for multicultural, partnership-based cooperation and equal opportunities. Discrimination based on race, ethnic origin, gender, religion, ideology, disability, age, sexual identity or other personal characteristics has no place at Pharmanovia or among its Business Partners.

We expect our Business Partners to ensure fair working conditions and to have a zero-tolerance policy towards any discrimination based on any of the above criteria. The Business Partner must ensure that it supports and promotes diversity in relation to all religious, human, idealistic and ethnic aspects, as well as in relation to all sexual identities, sexual orientations, and genders.

Fair Treatment

A workplace free of harassment, as well as free from any other harsh and inhumane treatment, including but not limited to, any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuses of workers shall be provided by business partners.

Freedom of Association

Business partners shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labour unions, seek representation and join workers' councils. Workers should be able to communicate openly with management regarding working conditions without fear of retaliation.

Freely Chosen Employment

Any form of forced or involuntary labour, including bonded labour, prison labour or indentured labour shall not be used. Business Partners will not engage in any form of slavery or human trafficking. All work must be voluntary, and workers shall be free to terminate their employment at any time. No unreasonable restrictions will be placed on a worker's freedom of movement.

Indigenous People and Local Communities

Business partners shall conduct operations and activities in a manner that upholds the human rights of local communities, including their right to a clean and healthy environment.

Alcohol and Drug Abuse

Business Partners must ensure a safe, productive, and drug-free working environment. No one shall be under the influence of illegal drugs, excessive alcohol, or other illegal substances on the Business Partner's premises.

Data Protection and Information Security, Social Media

The personal data of customers, business partners, shareholders/partners and employees of Pharmanovia are highly sensitive and must be protected by careful and responsible handling.

Business Partners must take a variety of technical and organisational measures to ensure the confidentiality of the personal data of Pharmanovia employees, its own employees and other business partners. It is responsible for ensuring a high level of data protection and shall strictly comply with data protection rules and in particular respect and observe the comprehensive rights of those whose data he collects, processes and uses.

ETHICAL CONDUCT

Prohibition of Bribery and Corruption

Pharmanovia does not tolerate immoral business practices such as corruption,

bribery and unfair advantage taking. Therefore, Business Partners are not permitted to unduly influence business decisions by granting or accepting improper advantages of any kind. Any undue influence on public officials and/or business partners is strictly prohibited not only for employees but for all persons working or providing services for Pharmanovia and/or the Business Partner in any form.

The Business Partners shall ensure that the policy for accepting, offering, promising, and giving gifts or hospitality is implemented on the basis of generally accepted market standards, which shall be complied with at all times by all its representatives.

Fair and Free Competition

We expect our Business Partners to comply with and ensure compliance with the applicable rules of fair competition and antitrust law and that its representatives act accordingly. All measures aimed at an impermissible restriction of competition and/or violating the rules are to be avoided. In principle, agreements between undertakings, decisions by associations of undertakings and concerted practices which have as their object or effect the prevention, restriction or distortion of competition are prohibited.

All Business Partners must ensure that they have implemented fully compliant rules and procedures to ensure proper Know-Your-Customer (KYC) processes that meet legal standards and to prevent and detect (potential) money laundering,

terrorist financing and other criminal activities to the extent possible, at all times.

The Business Partner must also comply with any laws, regulations, embargoes, or restrictive measures relating to trade, economic or financial sanctions administered, issued, or enforced by any of the following sanctioning authorities: United Nations Security Council, Germany, European Union, United Kingdom, United States of America and the governments and official institutions or agencies of any of these organisations.

Compliance with Tax Laws

Pharmanovia does not tolerate tax evasion or similar legally prohibited activities. Business Partners are strictly prohibited from evading taxes or similar, nor may it assist, support, advise or promote customers, business partners or other third parties in tax evasion or similar legally prohibited activities.

Business and trade secrets

Trade secrets and confidential information are important assets of Pharmanovia. Business Partners must ensure that they and their representatives are obliged to keep non-publicly known information about Pharmanovia, its business and its Business Partners strictly confidential and to protect it from unwanted disclosure. This applies in particular to essential intellectual assets such as trade secrets, intellectual property, trademarks, research and copyrights, patents, but also to conditions granted to third parties

and the content of data, contracts or documents.

Conflicts of Interest

Business Partners must ensure that the professional and private interests of its representatives are clearly separated. Conflicts of interest can call into question the integrity and professionalism of the Business Partner and thus also of Pharmanovia. They must therefore be recognised, disclosed and avoided at an early stage.

Accurate Business Records

Accurate and complete financial books shall be kept. Records of their transactions and payments must fully comply with all applicable laws, accounting principles, tax rules, and regulations.

Animal Welfare

Animals shall be treated with care and minimize pain and stress. Alternatives should be considered including use of fewer animals, and improve procedures to reduce distress. They should also comply with local laws and obtain necessary approvals before conducting studies.

Donations and Sponsorship

Donations and sponsoring serve the common good and its promotion. We are always aware of our responsibility for this. Our top priority is complete transparency. We also expect our Business Partners to ensure that donations they make to charitable causes, are ethically sound,

and are always made voluntarily and without consideration.

Social Media

Social networks offer countless opportunities to communicate with business partners, families, friends, and the public in general. Social media includes social media messenger services (e.g., WhatsApp Messenger, Facebook Messenger, Instagram), blogs, social network websites, wikis, photo/video sharing sites and other chat applications and chat rooms. Electronic messages are permanent records of communications that can have a significant impact on Pharmanovia's reputation. Business Partners must not appear to speak or act in the name of or on behalf of Pharmanovia unless they are expressly authorised to do so.

Cooperation With Government Agencies

Business partners shall cooperate with investigating government agencies charged with enforcing compliance as and to the extent required by local laws (including, where permitted, by providing reasonable access to facilities and workers). When required, partners will notify the relevant authority if they receive credible information that a worker, contractor or subcontractor has violated local laws.

Economic Sustainability

We seek to build a sustainable supply chain and create a positive economic impact in local

communities and around the world. Suppliers and partners involved in monitoring and assessing the safety and effectiveness of pharmaceutical drugs and medical products after they have been approved

sustainability of the communities in which they operate.

Gifts, Meals, Entertainment

Gifts, meal or entertainment shall not be provided to a Pharmanovia employee, or their family members, in any situation in which it might influence, or appear to influence a business relationship. Gifts and entertainment must be transparent, accurately recorded in their books and records, modest in value, customary to the occasion, related to a legitimate business purpose, and in accordance with all laws and with all policies of the recipient.

Marketing & Promotional Practices

All marketing and promotional materials and activities must conform to high ethical, medical and scientific standards, and comply with all applicable laws and regulations. When engaged with health care professionals, other decision makers or patients, all partners must adhere to relevant industry standards of conduct that apply to them, such as the European Federation of Pharmaceutical Industries & Associations (EFPIA), the International Federation of Pharmaceutical Manufacturers & Associations (IFPMA) and the Pharmaceutical Research and Manufacturers of America (PhRMA), and including without limitation, all other applicable local laws, standards and/or codes of conduct.

Pharmacovigilance

Partners involved in monitoring and assessing the safety and effectiveness of pharmaceutical drugs and medical products after they have been approved

and marketed must follow Good Pharmacovigilance Practices (GVP). Partners are responsible for complying with all relevant laws and regulations in their respective jurisdictions.

Privacy and Personal Information Policy

Privacy and personal information shall be protected. Data will be handled responsibly and sensitive information is safeguarded. Ensure data security and comply with all relevant privacy laws, including GDPR.

Product Quality

Business partners involved in the supply, manufacturing, packaging, testing, storage and distribution of materials/products on behalf of Pharmanovia will ensure compliance with applicable Quality regulations and Good Manufacturing Practice (GMP) and Good Laboratory Practice (GLP) requirements for the markets in which the products are registered and distributed. Partners will comply with all record retention requirements set by local regulators, as well as those specified in any Quality Agreement with Pharmanovia.

Supplier Relationship Management

We aim to create and instill a culture of belonging for our employees and supply chain partners. We work toward this goal by partnering with suppliers that provide competitive, high-quality goods and services and share our commitment to quality, patient safety and reliable supply of medicines. Suppliers are encouraged to promote equal opportunities in their sourcing process to suppliers from

socially and economically different categories.

Trade Compliance

All applicable import and export controls, customs requirements, sanctions and other trade compliance laws of applicable countries must be complied with where transactions occur. They shall conduct restricted party screening to ensure that their business partners do not appear on government watch lists or denied party lists.

Use of Technology, Including AI Policy

Technology shall be used responsibly, including AI, ethically and responsibly. Ensure AI respects human rights, avoids bias, protects privacy, and complies with applicable laws. Follow internationally recognized principles, such as the Organization for Economic Co-operation and Development (OECD) Principles on Artificial Intelligence.

Where AI is being used, business partners are expected to use safe, secure and confidential AI systems, to ensure that Pharmanovia's confidential information and employee and other individual personal data, is not disclosed or otherwise enters the public domain.

MANAGEMENT SYSTEMS

Auditing

Where required, business partners are expected to cooperate with Pharmanovia auditors for Environmental Health & Safety (EHS) audits, Quality, or external third-party auditors, at selected supplier facilities, to verify their compliance with our company's expectations; and by

working with them to address identified compliance gaps.

Business Continuity

Business continuity plans shall be developed and implemented for operations supporting Pharmanovia business. These plans should be made available to Pharmanovia upon request.

Continual Improvement

Business partners are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal and/or external assessments, inspections and management reviews.

Commitment & Accountability

Demonstrate commitment to the Principles described in this document by allocating appropriate resources and creating a culture of responsible business practices. Necessary documentation shall be maintained to demonstrate conformance with these expectations, and compliance with applicable regulations.

Due Diligence

Appropriate due diligence shall be conducted to determine the risks and exposures, prior to entering a business relationship with their own suppliers, to ensure that they can meet our company's expectations. Business partners will inform Pharmanovia in a timely manner about risks identified in their supply chains, in case there is an expected impact on Pharmanovia.

Effective Communication

Effective systems shall be in place to communicate these Principles to relevant stakeholders including their workers, contractors, and suppliers.

Grievance Mechanisms

Grievance mechanisms shall be accessible to internal and external stakeholders who should be encouraged to use them to report concerns, illegal activities, or breaches of these Principles at work without threat of or actual reprisal, intimidation, or harassment.

Legal Requirements

Business partners shall identify and comply with applicable laws, regulations and standards relating to all locations in which they operate as well as relevant customer requirements.

Regulatory Compliance

All required environmental permits, operating licenses, registrations and authorizations shall be obtained to ensure that business operations, including transportation, adhere to all regulatory operating and reporting requirements.

Response and Remediation

Incidents or concerns relating to these principles, shall be properly investigated and necessary corrective actions and remediation taken where required.

Risk Assessment & Risk Management

Mechanisms shall be in place to assess and manage risks in all areas addressed by this document. Business partners must timely inform Pharmanovia about any risks identified in their operations.

Supplier Selection & Monitoring

All applicable laws, regulations and industry standards shall be adhered to when selecting their own partners and suppliers. Business partners will select suppliers that are socially responsible and who share our company's commitment to ethics and integrity. Pharmanovia strives to obtain the goods and services we need to further our mission in a way that is lawful, efficient and fair.

Supply Chain Transparency

Wherever possible and when requested, provide, to the extent the commodity value chain allows, traceability of commodity sourcing to the production sites.

Traceability and Control

Systems shall be in place to conduct due diligence on their own supply chain, including traceability for the sources of raw materials to support legal and sustainable sourcing.

Training and Competency

Training that achieves an appropriate level of knowledge, skills, and abilities in management and workers shall be provided to address these Principles.

NON-ADHERENCE TO THE CODE

Reporting Non-Compliance

Business Partners must promptly report any actual or suspected material violation of this Code involving their personnel or representatives, a Pharmanovia Group employee, or another Pharmanovia business partner where the matter may affect Pharmanovia, its patients, products, people, assets or reputation. Reports

should be made in good faith and include available relevant information.

Reports may be anonymous. However, Pharmanovia encourages reporters to identify themselves in order to ease further investigations. Reporters that identify themselves and act in good faith will not be disadvantaged in any way. Their identity will neither be (i) disclosed to third parties (except to administrative or judicial authorities, if such disclosure is legally required as part of any legal proceedings arising from the investigation) nor (ii) to the affected person.

Business Partners must preserve relevant records, maintain confidentiality, prevent retaliation and cooperate fully with any review or investigation conducted by Pharmanovia or a competent authority. They must not obstruct an investigation, make false statements, destroy or alter relevant information, or take action against a person for raising a concern in good faith.

You can report violations by using any of the following speak-up channels.

Telephone: +44 (0)80072332255

Email: Pharmanovia@safecall.co.uk

Website: www.safecall.co.uk/report

Or alternatively you can contact us directly at:

Compliance@Pharmanovia.com