

POLPHARMA'S CODE OF ETHICS





DEAR COLLEAGUES,

When we adopted the Polpharma Code of Ethics in 2015, it was obvious that it was not a closed list of principles. We are a dynamic company operating in a dynamic reality. The development of new technologies, including artificial intelligence, climate and environmental change or rapid social change, bring about a number of dilemmas and new challenges. At present, as many as 5 generations are professionally active, that is why we want the Code of Ethics to remain a roadmap of the right choices for all people associated with Polpharma.

We know that our operations respond to the most vital social needs and that our products have an impact on the health and quality of life of patients. We are aware that business and economic objectives must go hand in hand with ethical values and principles.

As Polpharma, we have gone a long way, and the attitudes of our employees, their experience and commitment remain the basis of our company's culture. It is a legacy that we should respect and that commits us to maintain the highest ethical standards.

The new version of the Code of Ethics, which I have the honour to present to you, is still not a closed catalogue of principles. It opens to new times and new values. However, it remains an expression of our special responsibility as a pharmaceutical company.

Our mission "*We help people live healthy in a healthy world*" defines our social role and connects all employees and collaborators of Polpharma, regardless of their position, location or seniority. I would therefore like this document to give a sense of pride, security and belonging to all persons associated with Polpharma. I would also like it to be a signal and inspiration for business partners and other stakeholders, as well as a guarantee of a sense of responsibility towards the environment and the social sphere, in line with our mission.

Yours sincerely,

Jerzy Starak

Chairman of the Supervisory Board
POLPHARMA S.A. Pharmaceutical Works



The Code of Ethics is available to the public at the www.polpharma.pl website, via the intranet, from persons who are your direct supervisors and from the Compliance Officer.

Some issues tackled in the Code of Ethics are regulated by more specific procedures in force within POLPHARMA S.A. Pharmaceutical Works.

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ABOUT US

The history of Polpharma dates back to 1935, when the pharmacist Kurt Boskamp founded the Polpharma Polish Chemical and Pharmaceutical Plant in Starogard Gdański.

After World War II the factory was nationalised, and in 1959 — incorporated into the Polfa Pharmaceutical Industry Union. In 1995, the company returned to its historic name of “Polpharma”. In 2000, the company was privatised, which influenced its dynamic growth.

Today, owing to the attitude of thousands of employees, we are a leading company in the Polish pharmaceutical market and an international pharmaceutical group operating in the markets of Central and Eastern Europe, the Caucasus and Central Asia. Apart from drugs

and active substances, we also produce dietary supplements, foods for special medical purposes, medical devices and cosmetics.

We implement innovative solutions in all areas of our operation. We use world-class technologies and the highest manufacturing standards. We are committed to the development of science as well as health education and prophylaxis. Patients, doctors and business partners put trust in us.

Our strength lies in the commitment of all persons working for and cooperating with Polpharma, both in Poland and abroad. We create conditions for them to thrive and achieve their goals and to bring benefits to themselves, the company and its environment.



OBJECTIVES OF THE CODE OF ETHICS

We are aware of the responsibility resting with us as a company helping diseased people and supporting them in maintaining their health. We offer knowledge and experience to all those who use our products. We understand the importance of trust in quality of our everyday work.

The declaration of ethical conduct included in the Code is our motivation and shapes our decisions. For patients and business partners, it is a guarantee of applying honest and socially acceptable rules of our business.

The Code shapes Polpharma's reputation as a socially responsible organisation that cares for its needs and addresses the contemporary challenges of technological, social and environmental nature.

We are trying to have a positive impact on the environment and on our business partners. We strive for full reciprocity in respecting and observing the highest legal and ethical standards.



WHO DOES THE CODE OF ETHICS APPLY TO?

Any person employed by Polpharma and cooperating with us shall be obliged to act in accordance with the provisions of the Code. Therefore, we expect other companies and organisations, when cooperating with us, to respect the rules of the Code of Ethics and to conduct their business honestly and in compliance with the law.

The Code of Ethics is an obligation of every person working for our company, regardless of their position, seniority, workplace and working time. Therefore, we want the principles contained in the Code to be known and observed not only by persons employed under employment contracts, but also by those cooperating with us under civil law contracts, temporary employment contracts or seconded from external companies providing services to Polpharma.

HOW DO WE PROCEED?

Our mission is *"We help people live healthy in a healthy world."* It is based on ethical principles shaped by personal and professional attitudes of people creating Polpharma over the years and by the values on which we rely when pursuing our business goals.

As individuals to whom the Code of Ethics applies:

- we comply with the national law of the countries in which we operate,
- we act in compliance with the standards defined in the Code of Ethics both in internal and external relations,
- we follow company procedures,
- we are guided by the company's values and we assess our work in line with them,

- we feel responsible for the natural environment in which we live and work, and that is why we want to care for it,
- we actively counteract unacceptable behaviour in our workplace – we react whenever we notice behaviour contrary to the law or ethical rules adopted at Polpharma,
- we report events that violate the law or ethical standards,
- in justified cases, we propose solutions which improve the Code of Ethics or support the creation of the ethical culture at Polpharma.

If a situation arises in which national legal regulations differ from the provisions of the Code of Ethics and company procedures, we always comply with more restrictive regulations.



BASIC ETHICAL PRINCIPLES OF POLPHARMA

RESPECT

The human being is most important. We treat people and their work with respect, regardless of their position. Respect drives our relations with the people working and cooperating with us, and people using our products. We aim to create a work environment that respects the diversity and dignity of all people; free from discrimination and other unethical behaviour. We want our workplace to foster employee development and fulfilment of their professional and personal ambitions. We respect the right to privacy and to maintain a balance between private and professional life.

FAIRNESS AND HONESTY

Strict observance of the provisions of law serves as the basis for Polpharma's trustworthiness and reputation. Employees in all countries where we operate are required to be familiar with and follow the applicable laws.

For us, honesty is also about acting in accordance with acceptable ethical rules and good practice. This is reflected by the way we communicate and compete on the market, and by honest and reliable advertising and promotion of our products.



SOLIDARITY

Solidarity with another human being makes for the fact that we see our work as service and commitment. We offer help and support to diseased and suffering people. We strive to constantly improve our therapeutic solutions in accordance with the highest standards of the pharmaceutical market.

RESPONSIBILITY

We all feel responsible for our workplace and the quality of the tasks performed, knowing that our work affects the health and well-being of many people. We fulfil our obligations with diligence and commitment. We care for the company property and protect it from excessive risk. By keeping commitments and respecting trade secrets and confidential information, we form a credible and trustworthy organisation.

We pay particular attention to the safety and quality of our products. We feel responsible for ensuring constant availability of the products we manufacture, in particular of the life-saving drugs.

COOPERATION

We value teamwork based on knowledge and diverse competences of all employees and business partners of Polpharma, which is why we appreciate everyday commitment of each and every person. We build our company's position using the experience of the people working for Polpharma, as well as their openness to new ideas, which serve as the basis of our innovativeness.

Open communication and dialogue are important to us. Our goal is to constructively seek agreement and build partner relations. We support each other and strive for achievement of our common goals. The cooperation between people, teams and all entities which form Polpharma is the reason for our success on the market. It also enables the reinforcement of mutually beneficial relations with business and social partners.

Basic ethical principles define our identity and constitute the company's DNA. Based on them, we build our organisational culture and create organisational values that enable us to achieve business goals while respecting the principles of ethics.

Therefore, we assess our work not only on the basis of business results, but also on the basis of organisational values. You can find detailed materials about our values on the Intranet.

IN INTERPERSONAL RELATIONSHIPS

We offer equal chances of promotion, professional development and rewarding

We ensure work conditions which foster the development and professional satisfaction of people working in and cooperating with Polpharma. We motivate people to act. We create space for the development of talents and abilities. We establish reward and bonus systems based on objective criteria. Team managers carefully and reliably evaluate the work based on matter-of-fact criteria. We value professionalism, experience and work results. Our career paths depend solely on the company's needs, the results of work and commitment to the performance of assigned tasks. We are talking about opportunities for professional development. We provide access to programmes implemented in the company to improve knowledge and skills in line with the values and requirements of individual positions.

We respect human dignity and appreciate diversity

Our culture involves openness to everyone, regardless of their gender, age, ethnic origin, nationality, religion, sexual orientation, appearance, health, physical capabilities or any other aspect of diversity among the employees. We perceive diversity as strength. In our everyday operation, we make use of the rich and diversified experience of all the people working for the company, as well as our customers and business partners. We respect the opinions of others, seeking the sources of our

development and the ways to overcome difficulties and exchange knowledge. We respect the freedom of association.

We do not accept violation of the people's dignity, including irreverent, discriminating, offensive behaviour that infringes on the personal rights. We are committed to respect human rights in accordance with international conventions. We protect and do not publicise private information of the people we cooperate with. We avoid slandering. We are firmly opposed to any action which involves harassment or intimidation aimed at lowering self-esteem, isolation or exclusion from the team. Regardless of our differences, we respect each other and show good manners.

We act and communicate honestly

We act honestly and in accordance with good practice. We communicate in a professional manner which supports the Polpharma's reputation. We do not resort to unethical practices such as deception, understatement, or deliberate misleading.

We communicate decisions honestly and discuss frankly the work results we achieve. We provide information regarding expectations and assigned tasks. We share knowledge in a manner which fosters creation of partnership-based and agreeable relations in teams. We value cooperation and mutual support in the effective achievement of planned objectives, bringing profit to the company and its environment.



We ensure safe and healthy working conditions

Occupational safety and protection of health of employees and everyone who cooperates with us are very important to us. We respect the provisions and regulations which refer to safety and health protection for individual work stations. We actively operate to improve the working conditions beyond legal requirements in the field. We shape awareness and motivate people to be prudent at work, including warning against situations threatening their health and lives.

We care for the good reputation of Polpharma

Guided by mutual respect and trust, we respect the right to protect our employees' privacy. At the same time, we remember about the impact of our behaviour outside work on the reputation and image of Polpharma. In relations with the environment, we protect the company's good reputation. We respect Polpharma's brand and values. We follow the rule which states that communication about Polpharma to the media is conducted only by authorised persons. The detailed rules are set out in our procedure regulating the principles of communication on line and through social media – Netiquette.

IN BUSINESS RELATIONS AND WITH THE SOCIAL ENVIRONMENT:

We fulfil our commitments

We make every effort to perform our obligations. Out of concern for the safety of our customers and business partners and fair relations with the persons we cooperate with, we do not make promises that we cannot keep.

We protect Polpharma's assets

We value professional integrity. We are all responsible for the proper use of Polpharma's assets and preventing their waste or misuse. Company assets include, among other things, fixed assets and other movables, proprietary information, trademarks and other intangible assets, all funds and cash. Working time is

another important asset that we are obliged to use efficiently. Polpharma's assets are used exclusively for the proper performance of duties by those who work in and cooperate with Polpharma. We do not use them for private purposes in a manner inconsistent with applicable procedures. We actively counteract all situations which are not compliant with the adopted standards of conduct.

We respect intellectual property and trade secret

We do not use confidential information, including information recorded in electronic form, from previous employers or from any other source to which we do not have adequate rights. We protect and safeguard commercial, technical or scientific information about Polpharma, the disclosure of which could harm Polpharma. We prevent their disclosure or use by unauthorised persons. We protect and safeguard the confidential information provided by our customers and business partners in the same manner. We do not use any products of third party's intellectual creativity manifesting itself in any form to which we do not have adequate rights.

We are transparent

We take a strict approach to respect for the law and to compliance. We document our business transactions and other accounting operations in an accurate and transparent manner. We report financial results and are subject to audit by independent auditors. We also have appropriate internal procedures in place, such as The Anti-Corruption Code.

We avoid conflict of interests

In situations where personal or family interests, or other connections, are contrary to the interests of the company, we withdraw from action or decision affected by the conflict of interest. If in doubt as to whether there is a conflict of interest, we contact the Compliance Officer. The detailed principles for managing the conflict of interest are included in the Anti-Corruption Code.

Nie oferujemy i nie przyjmujemy korzyści

We do not compromise Polpharma's reputation by offering or giving benefits in order to establish or maintain a business relationship. We do not accept direct or indirect giving or offering to politicians, public officials, auditors, employees

of organisations and other bodies any benefits that could induce them to take or give up certain actions as part of their official duties.

The benefits offered by us as part of promotion and advertising activities to healthcare professionals – to the extent permitted by applicable provisions of law – should be symbolic and in accordance with the accepted practice. We do not offer benefits which formally do not violate the law but may be negatively perceived by the society, cause negative reaction of the person receiving the gift or in any way pose a threat to the reputation of Polpharma.

The remuneration offered to healthcare professionals in return for provision of services permitted by the law must correspond to the qualifications and amount of work. It shall not exceed the accepted market rates.

Our employees may accept business gifts only to the extent permitted by applicable local law and standard practice, and only where gifts are occasional or promotional and do not result in a commitment to reciprocity, or taking or refraining from certain actions. The value of gifts and the manner of proceeding after receiving them must be compliant with the relevant internal regulations of Polpharma.

We do not go beyond the limits of hospitality

We make every effort to ensure that our hospitality takes into account the guest's traditions and culture and is only a sign of respect and good business custom. We do not offer anything that could be construed as undue influence.

Hospitality towards doctors and pharmacists during promotional meetings and scientific events is acceptable only within the limits compliant with the provisions of law. Hospitality may not be excessive in relation to the goal and nature of the meeting and cannot violate the established practice. We refrain from acts of hospitality which could be negatively perceived by the society, cause negative reaction of the person receiving the gift or otherwise pose a threat to the reputation of Polpharma.

We apply honest competition and promotion rules

Our policy is to comply with the rules of fair competition and anti-trust regulations. We ensure that our advertising and promotional activities are in line with applicable regulations by adopting and applying internal procedures that include their verification process. In advertising, we act honestly, reliably and do not mislead anyone.

We do not accept providing customers and business partners with unreliable or untrue information or information which can be misunderstood or understood ambiguously.

We ensure product quality and safety

We are responsible towards patients and consumers for the quality, safety and unobstructed access to the products we manufacture. We consider this our most important commitment. We take care of it at every stage of development, production, storage and sale. We follow the international standards of the Good Manufacturing Practice. We want all employees to feel co-responsible for the safety and quality of products, and through their everyday actions contribute to the compliance with the standards in this respect.

We build good relations with our suppliers

As a socially responsible company we attach importance to our suppliers respecting international standards for the protection of human rights, including prohibiting child labour and forced labour, maintaining safe working conditions, applying the principle of fair competition, countering corruption and protecting the environment. It is important to us that our suppliers are aware of and respect the ethical rules of Polpharma.

We are guided by the principle of objectivity and equality of all entities seeking to work with us. We provide information and evaluate the quality of cooperation with suppliers in a reliable manner, seeking to objectively

and promptly clarify any doubts related to the cooperation process.

We are open to new technologies

We take a responsible approach to innovative solutions resulting from the development of new technologies, including digital technologies and artificial intelligence. We accept their use only within the limits of the applicable law and with respect for the dignity of the individual. We will not use new technologies in any way that would lead to deception or discrimination.

We support our patients and the medical environment

We are involved in programmes designed to facilitate patients' access to modern diagnostics and education as regards prevention and healthcare. We cooperate with the medical environment in this area. We support scientist in the field of medicine and pharmacy.

We care about good neighbourhood

We aim to ensure good relations with local communities, based on understanding and cooperation. We respect mutual expectations and commitments. We try to participate in the development of local communities through input in the economic, social and cultural growth, in a manner corresponding to the scale of our operations in a given region.

We foster and support the social involvement of everyone who works and cooperates with us. We care for those most in need through charity activities (including donations of medicines) and building an environment friendly to grassroots initiatives, such as employee volunteering.

We care about the environment

We are aware of the threats related to environmental degradation and climate change. We take them into account when planning and pursuing business objectives. We conduct our

operations in accordance with applicable provisions of law, bearing in mind the constant reduction of negative impact on the environment and the quality and conditions of living in the area of our influence. According to the idea of sustainable development, we use advanced technological solutions and apply the highest environmental protection standards in order to preserve the qualities of the environment.

We shape the ecological attitudes in our team and emphasise the role of environmental protection in our surroundings and actions. We value the activities of the employees aimed at climate protection and improvement of natural environment both at work and outside work. We influence our contractors by striving for the most sustainable supply chain possible.

MANAGEMENT'S ATTITUDE

Management staff at all management levels in Polpharma are people whose attitude should serve as a good example and be a role model for their subordinates.

Supervisors are particularly responsible for:

- creating conditions enabling their subordinates to accomplish their objectives and tasks which will help to establish a workplace culture based on ethical values and rules,
- promoting the standards and rules of conduct defined in the Code of Ethics in everyday professional practice through conversations with everyone who works and cooperates with Polpharma, and paying attention to ethical issues at work,

- enabling all employees to get to know the Code,
- within the area of their competences – providing all necessary explanations and advice with respect to solving ethical problems reported by employees,
- receiving notifications of irregularities or infringements from persons working and cooperating with Polpharma,
- responding to any behaviour which may result in negative consequences for both Polpharma as a whole and for the persons or entities cooperating with Polpharma,
- providing support to employees who report ethical concerns, and protecting employees against retaliation by individuals who act unethically.

WHAT TO DO IN ETHICALLY QUESTIONABLE SITUATIONS?

The Code of Ethics constitutes the main source of information about the rules and ethical standards of operation in Polpharma.

However, we assume that situations may occur in which the provisions of the Code of Ethics may be insufficient for proper ethical evaluation. In such cases, we have the right to consult our doubts with the immediate superior, or with the HR Department or Compliance Officer.

If we are not sure how to act in a given situation, the answers to the following questions may be helpful:

- Is my behaviour in a given situation compliant with the provisions of law and the procedures in force in Polpharma?
- Is it compliant with the ethical values and rules described in the Code of Ethics?
- Is it compliant with my values and code of conduct? How will I feel if I act like this?
- Can this behaviour impact the decisions I make when performing my professional obligations?
- Would I like others to behave like this on everyday basis?
- Would I like to be treated this way?
- How would my loved ones feel if they knew about my behaviour?
- How would my superior and other people I cooperate with react to this situation?
- Can this situation put Polpharma at the risk of financial or image-related damage?
- How will my loved ones, people I work with and my superior as well as the Polpharma environment react if the situation is shown by the media? What will I feel then?

The Code of Ethics provides a framework and defines standards for our behaviour, offering the support required to work in accordance with ethical standards and applicable laws. It is important, however, for employees to independently assess whether a specific conduct supports the reputation of Polpharma as an honest and reliable business partner, whether it poses a threat of damage to the company or its image and puts our customers at risk of lack of access to our products.



REPORTING VIOLATIONS

If you witness a violation of the provisions of the Code of Ethics (or have a reasonable suspicion of a violation of its provisions), you can take action to improve the situation. You may also report it in an open conversation with the person you report to obtain the necessary support. If you cannot approach your superior, or if, due to the nature of the matter, it is not advisable, we encourage you to contact the Compliance Officer directly, who will undertake the investigation.

In the event of a violation of the law, in accordance with the applicable whistleblowing procedure, we are obliged to report this fact to the Compliance Officer. For external stakeholders, we have a notification channel available on our website.

Each report is important to us, that is why we thoroughly analyse it, and the reporting person is informed about the outcome of the investigation.

No tolerance for activities aimed against individuals reporting a violation

In Polpharma, we do not tolerate any form of discrimination or retaliation against individuals reporting cases of violation of the provisions of law, the Code of Ethics or other company procedures. A person committing such actions will be subject to separate disciplinary proceedings, which may result in termination of the employment relationship.

The current version of the Code has been in force since 1 July 2023. All persons covered by the principles of the Code of Ethics shall comply with its principles and shall be subject to mandatory training at least once a year. The Code of Ethics shall be reviewed at least once every 3 years.

