

Introduction

The present Code of Ethics of PharmaMedia Dr. Müller GmbH (PMM) describes how PharmaMedia Dr. Müller GmbH as a company and the employee of PharmaMedia Dr. Müller GmbH in relation to the following topics

1. FOCUS ON BUSINESS PARTNERS
2. INTEGRITY
3. RISK MANAGEMENT
4. COMPETITION
5. CONFLICTS OF INTEREST
6. PRIVACY POLICY
7. DEALING WITH EMPLOYEES
8. ENVIRONMENTAL MANAGEMENT

This code of conduct (code) describes the principles of conduct that underline our values:

- Our obligation to conduct PMM GmbH's business with the utmost integrity by complying with all locally applicable laws and regulations in all countries in which we operate;
- Rules that serve as guidelines for employees and directors in order to make ethically sound decisions in relation to potential conflicts of interest, political engagement, and bribery and financial incentives;
- Generally accepted principles for relations in the workplace, which include mutual respect, non-discrimination and the principle of freedom of association;
- To ensure the quality of our products and the safety of our customers, employees and third parties by adhering to health and safety standards, by complying with the principles of good manufacturing and other procedural standards and by providing a safe working environment
- Supporting innovation by investing in research and development focused on new and improved products and all aspects of our business to improve our products for our customers;
- Responsible environmental protection in order to minimize negative effects of our activities on the environment
- PMM GmbH strives to maintain high standards in terms of business practice and to be a responsible employer

Focus on business partners

This Code and its associated guidelines are designed to ensure that:

- Our customers and the public in general can rely on PMM GmbH to work with the highest level of integrity at all times
- Our business partners (e.g., contractors, suppliers and distributors) know what they can expect from a business relationship with us and what expectations we place on them; and
- Our employees know their obligations towards PMM GmbH as well as PMM's obligations towards customers.

We should all be guided by these principles and the company's values in our work for PMM.

Integrity

We will:

- Expect all employees to comply with all applicable laws, regulations, guidelines, standards and codes wherever we operate;
- Ensure that all of our employees are aware of their commitments and how to implement them in their day-to-day work; and
- Measure and manage business results and apply the principles of continuous improvement to further improve our responsible behavior as a company.

Risk management

Risk management is an integral part of the general management principles of PMM. We take a structured, consistent, company-wide approach to risk management to improve the performance of our businesses. We are all responsible for integrating risk management into our culture and into all of our processes at every level.

We generally adhere to all local laws and industry standards relevant to our operations, such as the ISO 9001/2015 guidelines, and work on the basis of GMP.

We will:

- Maintain quality assurance systems and ensure that quality assurance processes are understood and strictly followed by our employees;
- If necessary, inform customers immediately if we become aware of safety or quality problems with one of our products;

PMM has a quality assurance system that supports the development, manufacture and delivery of our products. We are audited by customers and public authorities to ensure that our systems and products meet the compliance requirements of all applicable guidelines.

At PMM, we are committed to ensuring the integrity and quality of our business accounting and all business documents we create and manage in order to convey an adequate, truthful and accurate picture of our business. We have internal control systems to ensure that our financial statements comply with the applicable local laws of the countries in which we operate and that fraud and other inappropriate behavior are prevented.

Protection of assets and information. PMM facilities, equipment and other assets must be well maintained and adequately protected against theft, misuse and unauthorized disclosure. Consequently, it is the responsibility of every PMM employee to ensure that our assets and information are protected. In the information technology space, we ensure that our valuable information is securely stored and protected from a wide range of threats to ensure business continuity and minimize business risks.

Every single employee has to ensure that our information is safe. PMM recognizes that the use of the Internet is widespread and has numerous benefits for both PMM and the employees or those who provide services for or on behalf of PMM. Any online communication, including the use of social media, must follow the same principles and guidelines that apply to all other employee activities and that are referred to in PMM's guidelines.

Online activity must not disclose any information that could be considered a trade secret or otherwise confidential or proprietary information of PMM. Private use of the Internet in PMM's work environment is permitted if it does not impair the work performance and the execution of work tasks of the employees and takes place in the employees' free time (breaks, etc.). It must not contain any material that violates any law, damages the reputation of any person or PMM, or that could generally be considered offensive or inappropriate.

However, it is impossible to identify all pages with inappropriate content and restrict access to them. Therefore, employees should be careful about which pages they access. We reserve the right to take measures to protect PMM from criminal or inappropriate activities and to ensure that employees perform their duties in accordance with the PMM guidelines. In any event, we will ensure that personal information is protected in accordance with local laws

and regulations. All equipment and other assets (including laboratory notes and notebooks) owned or leased from PMM remain the property of PMM and must be returned to PMM upon termination of employment or at the request of PMM management.

Competition

Respect for trade customs and competition laws is a foundation for our integrity and good reputation. PMM advocates the free-market economy and prohibits practices that in any way:

- Mislead customers;
- Result in pricing that violates applicable trade customs or competition laws; or
- Imply that information about competitors is being collected in an illegal or unethical manner; or
- Constitute unfair competition in any other way

Conflicts of interest

When performing the tasks in the respective area of responsibility at PMM, all employees and management are expected to give PMM's interests priority over their private interests. A conflict of interest can arise when private interests conflict with an employee's obligation to serve PMM's interests. It should be emphasized that such a contradiction does not necessarily have to arise before a conflict of interest is identified.

The determination of a conflict of interest in a particular situation may be enough to compromise or compromise an employee's professional reputation or judgment. These include, without claiming to be exhaustive, the following situations:

- A private interest (financial or otherwise) could potentially affect an employee's judgment in doing business for PMM;
- An employee's loyalty to immediate relatives or other external parties, groups or organizations could conflict with the interests and concerns of PMM;
- An employee is interested in a transaction that PMM is known to be or may be interested in; or
- An employee receives fees, commission payments, or other benefits from a supplier, competitor, or customer of PMM; or
- An employee uses his working time, equipment, accessories or labour for something other than the activities, programs or purposes approved by PMM.

In the event of a conflict of interest or any situation where there is any doubt as to whether there is a conflict of interest, employees should provide the apparent or actual details of the conflict of interest to their supervisor, senior management or HR. To avoid potential or identified conflicts of interest, employees must obtain approval from their manager before starting or continuing work outside the company.

Bribery & Corruption

PMM company and employees must not, directly or indirectly, offer, solicit, or accept bribery, or pay or receive personal financial rewards or incentives in return for business decisions. This applies regardless of the size of the rewards or incentives. Even where facilitation payments are not prohibited by law, the PMM guidelines strictly prohibit facilitation payments. Our employees and members of the management are not allowed to accept or distribute gifts or hospitality if this could influence their objective business judgment in decision-making processes or if one could suspect such influence.

Entertainment & Gifts

PMM is aware that, as part of their work for the company, employees from time to time:

- Would like to entertain customers, potential customers and other business partners of PMM or give them gifts and
- That they may receive gifts or entertainment from suppliers, potential suppliers or others with whom PMM does business.

The possibility of gifts or hospitality or the acceptance of the same should only be used in selected cases, in an appropriate and moderate manner and in agreement with the management. Gifts of money or cash equivalents (e.g., vouchers) may not be distributed or accepted. Other than in special cases that require senior management approval, entertainment should not be provided to colleagues at PMM's expense.

Where a gift or entertainment is deemed appropriate, the type of gift or entertainment should conform to professional and general standards of ethics, not against good taste, comply with applicable laws and industry guidelines, and in accordance with our Values stand. Gifts or hospitality may not be requested or solicited. The distribution of gifts or entertainment must be appropriately recorded in PMM's financial records.

Privacy policy

Protecting Third Party Information

PMM respects and protects the privacy of everyone we deal with, including customers and their contacts. In this context, it is important that we comply with all applicable local laws promptly and efficiently - not only because we are legally obliged to do so, but also in line with our corporate policy. When we collect, process, store and transfer personal data, we take appropriate precautionary measures in accordance with all applicable local laws to ensure that data protection is respected and protected.

Protection of employee data

PMM ensures that when processing employee data, the individual's right to data protection is respected, taking into account our legitimate business needs. Therefore, we will only collect personal data from employees where this is necessary for our business processes. In doing so, we do not interfere unnecessarily with your privacy and observe all applicable local laws.

Dealing with employees

Minimum wage

We comply with labor laws and our employees receive benefits equal to or greater than the minimum wage for their work and any allowances they are legally entitled to. In all cases, the working conditions at PMM meet or exceed the legal minimum standards.

We will:

- Provide a workplace that is free of harassment and discrimination and that is a place where we treat each other with mutual respect;
- Respect and promote diversity in the workplace;
- Ensure that the remuneration always meets or exceeds the legal standards and that employees are remunerated according to the market value of their services;
- Protect the health and safety of our employees and contractors and other people who are on Company premises;
- Make recruitment and promotion decisions based on skill and performance;
- Communicate clearly that we will not tolerate harassment or discrimination in the workplace and that violations of this principle may result in disciplinary action;
- Use a fair and fair process for employees who wish to make a complaint or seek advice;
- Assure our employees that we will maintain confidentiality as far as this is possible under the given circumstances, and
- Ensure that no countermeasures are taken against any employee who raises a concern or indicates harassment in the workplace.

Health and safety

PMM is committed to providing safe, healthy and clean workplaces for its employees, other people present on company premises and the environment in which we operate.

Employees and other people on our company premises must report all security risks as soon as possible so that appropriate measures can be taken to prevent, correct or control future security risks.

Professional behavior

Termination

If PMM terminates an employee, we will do so in a manner that takes into account applicable local laws and the principles of PMM's human resources policy.

Mutual respect

PMM has high standards of professional and ethical behavior that apply to our relationships with customers, suppliers, colleagues and the public at all times.

This includes the following:

- No tolerance for intimidation, bullying, hostility or threats;
- courtesy and respect for others;
- Respect for the personal property of others and the property of PMM;
- To act with integrity at all times;
- Working together as a team to get better results;
- Striving to understand customers and meet their needs;

Disclosure of Confidential Information

PMM expects its employees to maintain the confidentiality of information obtained during their employment with us and not to disclose or use it unless for a purpose approved by PMM.

This point includes, for example, the following information:

- Pricing guidelines and guidelines;
- Strategic and product development plans;
- Financial information;
- Customer information;
- Inventions and discoveries; and
- Confidential information obtained by PMM from third parties.

We require that our employees transfer to PMM at any time and free of charge all developments made by them during their employment at PMM or on the basis of PMM intellectual property which are to be regarded as intellectual property. The only exception to this principle is case where local law requires consideration to be paid. In this case, we will pay the minimum amount required by local law.

Drugs & Alcohol

To ensure a safe working environment, employees are prohibited from using drugs or alcohol directly before and during their work at PMM. In addition, the illegal or unauthorized use, possession, sale or transfer of drugs and alcohol is prohibited at all times. For PMM events, the responsible managers must ensure that alcohol is only served to a reasonable extent, unless the consumption of alcohol is otherwise prohibited by local laws or local PMM guidelines.

To ensure that new employees we recruit are able to contribute to a safe and productive work environment, we may require candidates for certain positions to undergo a health screening. Such investigations are always conducted in accordance with local laws and regulations.

Company affiliation

PMM recognizes a long and successful company affiliation.

Disciplinary action and employee counseling

PMM has standards of workplace performance and behavior that are maintained through the use of informal counseling, employee training, formal counseling and disciplinary action up to and including termination. Serious misconduct can lead to the immediate termination of the employment relationship. Serious misconduct includes, among other things, behaviors that

- Are illegal;
- Are damaging to business;
- Pose a risk to the safety and integrity of PMM and its employees as well as customers;
- Violate this Code and other internal guidelines and procedures; or
- Speak out against the continuation of the employment relationship in another way.

The actions taken in response to misconduct depend on how serious the misconduct is. Uniform measures are taken within a work environment that are in line with the legal requirements applicable there. In all cases, employees are given the opportunity to justify their behavior.

Environmental management

At PMM, we conduct all of our activities in a way that minimizes negative impacts on the environment and conserves natural resources. We see environmental advocacy as our responsibility and an opportunity to build healthier and more sustainable environments.

We will:

- Within the framework of the environmental laws and regulations of the legal areas in which we operate, conduct our business, meet or exceed applicable environmental standards and take effective measures against any violations that may occur;
- Maximize the efficiency of the use of water, electricity and other resources, particularly by continuously improving our manufacturing operations;

Our guideline describes our environmental obligations and forms the framework for our environmental goals. Employees must report all accidents, incidents, and spillage or release of materials into the environment to their supervisor so that appropriate action can be taken to prevent, correct, or control them.

We will:

- Ensure that all employees have access to the code,
- Ensure that our employees, customers and suppliers have easy access to this Code;
- Ensure that our employees, customers and other parties can raise concerns about unlawful behavior and violations of PMM's guidelines or our self-image (anonymously if necessary, if desired and permitted) without having to fear consequences (other than such concerns turn out to be frivolous and harassed); and
- Ask our employees and other stakeholders for suggestions on how to improve this Code and respond to them.

PMM created this code because the company wants to continue positive and transparent relationships with its employees, contractors and other parties. We understand that there may be situations where employees, contractors and other parties need to report cases of inappropriate behavior to us.