

Polpharma Biologics International AG Third Party Code of Conduct

May 2026



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Introduction

Polpharma Biologics International conducts business operations based on the highest ethical standards, guided by our values founded on operating principles rooted in respect, integrity, responsibility, openness, solidarity, and collaboration.

Our mission is: “We empower better treatment choices for more people – through impact-driven molecule selection and smarter, faster biosimilar development”.

We act responsibly toward society and the environment, respecting the rights and dignity of all people. We respect internationally proclaimed human rights and embed sustainability across our operations and value chain. We foster diversity and inclusivity, and do not tolerate any form of discrimination of any kind, and we, expect the same approach from our stakeholders, including our Business Partners.

We strive to identify, prevent, and mitigate potential risks and adverse human rights impacts that may be linked to our operations, products and services and value chain. Where adverse impacts occur, we take appropriate action to address and remedy them.

We expect our Business Partners to adhere to consistent principles of conduct that are aligned with the standards and values accepted by Polpharma Biologics International, regardless of their country of origin, industry, or scale of operation.

Compliance with the high ethical and social standards upheld by Polpharma Biologics International, such as:

- adherence to legal requirements, including those concerning human rights protection, safety of people and information,
 - compliance with ESG (Environmental, Social, and Governance) requirements and ethical business practices,
 - maintaining the highest standards of employment,
- care for the natural environment and local communities, including through engagement and dialogue, and striving for continuous improvement in the quality of services provided, is fundamental in establishing and maintaining cooperation with our Business Partners.

This Code summarizes the key principles of conduct for Polpharma Biologics International and its Business Partners. Compliance with and promotion of these principles is essential for the selection and evaluation of partnerships. Where local laws differ from international standards, the most stringent requirements shall be applied. In all cases, human rights practices must align with international regulations

This Third Party Code of Conduct is aligned with the Third Party Code approved at the Polpharma Biologics Group level. Polpharma Biologics International is responsible for ensuring that its Business Partners comply with the provisions of this Code.

Interpretation

For the purposes of this Code:

Third Party/Business Partner – Any external entities, including suppliers, subcontractors, service providers, consultants, clients or any other partners.

Workers – All individuals performing work under the Third Party's control or supervision, including, subcontracted, temporary, agency, apprentices, and migrant workers, regardless of employment status.

International Regulations – Includes the UN Guidelines and OECD Guidelines, as well as conventions, international laws, and voluntary standards listed in the Appendix.

Management And Ethics

We require our Business Partners to operate in line with Polpharma Biologics International's values, such as integrity, respect, solidarity, responsibility, and cooperation, and to comply with applicable laws, this Code, and relevant International Regulations.

We also expect Business Partner to ensure their Workers receive ongoing training on ethical conduct, human rights, environmental responsibility, and legal compliance.

Integrity and Responsibility in Operations

Our Business Partners shall uphold the highest business standards, including fair competition, transparent communication, product safety, and the proper handling and protection of personal data and confidential information. Business Partners must also respect intellectual property and comply with all applicable legal and regulatory requirements relevant to their specific activities.

Anti-Corruption in All Its Forms

All Business Partners must comply with our anti-corruption principles as outlined in the attached Anti-Corruption Policy and strictly prohibit any form of corruption, whether involving their Workers or third parties, in both public and private sector interactions.

Offering or granting undue benefits to influence decisions or secure business advantages is strictly forbidden. This includes money, gifts, services, or any other benefits provided to politicians, public officials, auditors, or representatives of regulatory or supervisory bodies.

Business Partners must not offer cash or cash equivalents to Polpharma Biologics International employees. Only modest, customary business gifts are permitted if compliant with applicable laws and the Polpharma Biologics International' Anti-corruption, given occasionally, and not intended to influence decisions or create obligations. Where stricter anti-corruption thresholds are required by Polpharma Biologics International or its clients, they shall prevail.

Conflict of Interest

Our Business Partners must prevent and avoid any actual or perceived conflicts of interest throughout their relationship with Polpharma Biologics International. This includes conflicts arising from personal, familial, or financial ties between representatives of both parties. Business Partners are required to comply with all fair competition and antitrust laws and regulations, ensure truthful advertising, and promptly disclose any actual or potential conflicts of interest to Polpharma Biologics International's Compliance team by emailing: pbil.legal@polpharmabiologics.ch.

Risk Management, Including ESG Risks

Our Business Partners shall maintain, and continuously improve, risk management systems addressing risks related to business partners, supply chains, safety, and potential corruption or fraud, in line with this Code.

They must integrate sustainability (ESG) risks into their risk management frameworks, particularly by:

- Identifying, assessing and prioritizing actual or potential adverse impacts (effects) of their activities, taking measures to prevent or mitigate risks, and remedy adverse effects where they occur.
- identifying and assessing actual or potential risks to the Business Partner's operations related to sustainability issues, preventing, and minimizing impacts should those risks materialize.

Sustainability issues are understood to include environmental, social, and governance (ESG) factors. For example, adverse impacts of a Business Partner's operations on sustainability might include violations of human rights or labor rights or environmental pollution (of water, air, or soil). Risks to the Business Partner's operations related to sustainability issues might include climate change (e.g., the need to temporarily suspend or limit operations during heat waves or due to food damage) or dependence on natural, human, or social resources (e.g., reliance on water availability or raw materials supplied by certain categories of vendors, or dependence on access to highly skilled workers).

Risk management in the area of sustainability shall be supported by a risk-based due diligence process, aligned with the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the UN Guiding Principles on Business and Human Rights, the Swiss Climate and Innovation Act and the EU Directive 2024/1760 on Corporate Sustainability Due Diligence.

Business Continuity and Crisis Management

Business Partners shall implement structured crisis management mechanisms for emergency or crisis situations, including in relation to the continuity of services or supplies to Polpharma Biologics International.

Data Protection

Business Partners must ensure the proper protection and use of confidential information to safeguard the privacy and confidentiality of company data, Business Partner Workers, and all stakeholders. They shall comply with applicable laws on data privacy and protection, including but not limited to the Swiss Federal Act on Data Protection ("FADP") and the Regulation EU 2016/679 of the European Parliament and of the Council, of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR"), ensuring the secure and lawful use of personal data. They must also proactively mitigate risks related to information security, including cybersecurity risks.

Data Integrity

Data Integrity is a core element of pharmaceutical Quality Systems and essential to ensuring the quality, safety, and efficacy of medicines. Serious breaches may compromise products, services, and reputation of Polpharma Biologics International. Business Partners must ensure their employees are adequately trained and that data integrity requirements are embedded in procedures and operations. These principles of data integrity follow most current industry standards, and ensure that data generation and management throughout the entire lifecycle of data until archival, follow ALCOA++ rules: data must be Attributable, Legible, Contemporaneous, Original and Accurate 'plus' Complete, Consistent, Enduring, Available and Traceable.

Reporting Irregularities

Business Partners shall actively promote an ethical culture and build trust within and outside their structures by providing secure and confidential channels for reporting irregularities. These systems must protect personal data, ensure acknowledgment and feedback, and safeguard whistleblowers from retaliation.

Documentation

Business partners shall maintain accurate and complete documentation demonstrating compliance with this Code and applicable legal obligations.

All records related to business with Polpharma Biologics International, including payments, gifts, and other benefits (made on behalf of Polpharma Biologic International or out of its provided funds), must be properly documented and transparently accounted for.

"Off-the-books" accounts and false or deceptive entries are strictly prohibited. All financial transactions related to business with Polpharma Biologics International must be documented, regularly reviewed and properly accounted for in accordance with applicable laws and internal controls. Upon justified request, relevant documentation shall be made available to Polpharma Biologics International, subject to confidentiality and legal constraints.

Business Partners must also ensure appropriate internal financial controls, approval processes, and record retention in accordance with applicable laws/regulations and agreed standards.

Sustainable Development

In line with global sustainability commitments, such as the United Nations' 2030 Agenda (17 Sustainable Development Goals), efforts to combat climate change under the Paris Agreement, and applicable regional or national (such as EU law or equivalent domestic frameworks), Business Partners are expected to actively adopt sustainability principles and therefore minimizing environmental and climate impact, respecting human and labor rights, and contributing to resilient economies and safe communities.

Key measures in minimizing the environmental impact of Business Partner operations include scientifically-based actions to mitigate climate change, reducing carbon footprints (across all scopes, including Scope 3), lowering greenhouse gas emissions, protecting biodiversity and ecosystems, preventing overexploitation, erosion, and contamination of natural resources (including deforestation and forest degradation), promoting sustainable use and conservation of water and marine resources, transitioning to a circular economy, and preventing and controlling pollution of soil, water, and air.

Responsible Minerals

Business Partners shall make reasonable efforts to avoid sourcing materials from conflict-affected or high-risk areas linked to human rights abuses, corruption, or the financing of armed groups. They must ensure transparency in mineral sourcing and comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

Business Partners shall:

- Provide transparent information about the source of 3TGs (tin, tantalum, tungsten and gold) in products, components or materials supplied to Polpharma Biologics International by our Business Partners (including the smelter or refiner where such 3TGs were processed and the country of origin of the 3TGs where possible through reasonable means)
- Cooperate with Polpharma Biologics International in its due diligence process and in responding to its requests for information relating to minerals used in our products
- Provide, upon request, reasonable evidence of the Business Partner's performance of similar due diligence with respect to any of their suppliers or sub-contractors involved in the production of the materials or products supplied to Polpharma Biologics International or any components of those materials or products
- Work with Polpharma Biologics International to assess opportunities for alternative sources where 3TG responsible minerals are identified.

Employment Conditions And Workers' Rights

Business Partners shall respect international standards for the protection of human rights as defined in International Regulations and support their respect and prevent violations throughout their value chain as part of their operations.

Child Labor

Child labor in any form is strictly prohibited. The minimum working age of the Business Partners' Workers must comply with the applicable laws in the Business Partner's country and must not conflict with compulsory education requirements and thus shall not be less than 15 years, unless the exceptions recognized by the International Labour Organization (ILO) apply. The employment of minors for work that is hazardous to their health or safety is strictly forbidden.

If prohibited child labor is identified, Business Partners must implement remediation measures that prioritize the Childs 'wellbeing, including removal from work and continued support (e.g., education, accommodation, or financial assistance, or other costs as necessary) to the child until adulthood. These policies and programs shall conform to the provisions of the relevant ILO standards.

Freedom of Employment

Forced labor, slavery, and human trafficking are strictly prohibited. Business Partner Workers must be employed voluntarily, and Workers must be free to terminate it in accordance with applicable laws. Specifically, our Business Partners must not retain Worker's personal documents or charge recruitment fees or deposits. Wages must be fair, paid on time, and in a dignified manner.

Business Partners are expected to oversee recruitment process with due diligence, ensure migrant Workers have access to grievance mechanisms in a language they understand, and guarantee their safe and dignified return to their home countries without penalties or undue debt.

Equality and Non-Discrimination

Business Partners shall ensure a respectful, safe, and inclusive workplace. Harassment, bullying, intimidation, violence, or any degrading treatment is strictly prohibited, as is discrimination of any kind.

These principles must be reflected in transparent employment policies, and clearly communicated to Workers. Effective reporting channels must be in place, allowing Workers to raise concerns without fear of retaliation or job loss.

Employment Terms, Wages, and Working Hours

Business Partners shall ensure fair, transparent, and lawful employment practices in line with applicable laws and industry standards.

Workers must be informed of their terms of employment, pay, and working hours in a language they understand before starting work. These terms must comply with applicable labor laws and, where relevant, collective agreements.

Compensation must be fair, timely, and compliant with legal requirements, with equal pay for equal work. Deductions from wages may only be made in accordance with local law.

Working hours and wages must be accurately recorded. Overtime shall be voluntary and fairly compensated in accordance with applicable laws or collective agreements, in any case without compromising Worker's health and safety.

Workers shall be entitled to rest periods, time off, and leave in accordance with national labor laws and international standards, including those set by the International Labour Organization (ILO).

Business Partners must not circumvent labor or social security obligations through the use of subcontracting, temporary contracts, or apprenticeship schemes that do not genuinely aim to impart skills or provide regular employment.

Special Protections

Business Partners must ensure special protections required under applicable laws and International Regulations for their Workers with disabilities, pregnant women, and parents of young children. Where possible, Business Partners are encouraged to go beyond legal requirements and actively support the inclusion and participation of these categories of Workers in the workforce.

Freedom of Association

Our Business Partners' Workers must have the right to communicate with management, join associations or unions, engage in collective bargaining, and participate in information sharing and consultations. They shall also be able to influence and improve working conditions and the workplace environment within the timeframe, conditions, and cases specified by national laws. Business Partners must ensure these rights are upheld, provide clear channels for raising concerns without fear of any form of retaliation and discrimination, and communicate any collective agreements in a language Workers understand.

Continuous Professional Development

Business Partners must ensure equal access to training and professional development supporting Workers' long term career growth.

Communication of Workers' Rights and Employment Principles

Workers must be clearly informed of their rights, safety regulations, work ethics, principles of conduct, and employment rules, including those concerning remuneration, promotions, professional development opportunities, and the modification or termination of their employment.

Responsibility for the Value Chain

Business Partners are expected to uphold international human rights standards and ensure that these employment principles are respected throughout their value chain.

According to the definition provided in Delegated Regulation 2023/27721, the value chain includes all activities, resources, and relationships involved in creating and delivering products or services, from development to disposal, and covers both upstream (e.g., suppliers) and downstream (e.g., distributors, customers) entities.

Occupational Safety And Hygiene

Polpharma Biologics International's Business Partners are required to provide healthy and safe working conditions.

Working Conditions

Business Partners must provide safe and hygienic working conditions in line with legal and industry standards. Workers must have access to safe and technically sound workplaces, appropriate equipment and necessary protective measures. Special attention shall be given to protecting Workers from chemical, biological, and physical hazards. Business Partners are also required to identify and monitor risks to implement effective preventive measures.

Safety in Production Processes

Business Partners shall manage production processes in compliance with applicable regulations and safety standards. This includes systematic risk analysis (both occupational and process), documentation of findings, and implementation of necessary measures to mitigate risks, particularly in hazardous work environments.

Prevention Through Education

Business Partners shall provide regular safety training and ensure Workers are informed about hazards, emergency plans, and response procedure. When working at Polpharma Biologics International facilities, Business Partner must communicate and enforce applicable safety and fire protection standards. They shall also implement effective emergency plans to minimize potential impacts.

Promoting Active Participation and Health Prevention

Our Business Partners shall promote Worker's active involvement in ensuring safe working conditions and support preventive health measures, particularly in addressing workplace-specific risks.

Product Safety And Quality

Business Partners are required to meet all safety and quality requirements for products, treating these aspects as top priorities.

Safety and Quality Requirements and Regulations

Suppliers must comply with applicable laws, international standards (including Good Manufacturing Practices GMP and Good Distribution Practices GDP), and contractual requirements across all stages of production, storage, transport, and distribution. All activities that may impact the safety and quality of Polpharma Biologics International's products are subject to strict oversight and regulations.

Commitment to Process Improvement

Business Partners are expected to actively seek ways to improve processes related to sourcing, production, storage, and transportation to enhance product quality, optimize the supply chain, positively impact the economy, and meet the requirements outlined in this Code.

Research

Business Partners conducting research involving humans or animals must do so responsibly, in compliance with applicable laws, ethical standards, and best practices.

Research Involving Humans

Business Partners conducting research involving humans on our behalf must comply with applicable laws and universally accepted international ethical and scientific standards, including the Declaration of Helsinki and Good Clinical Practice (GCP).

Research Involving Animals

Animal research must only be conducted when legally required or when no scientifically valid alternatives exist. Business Partners must comply with legal requirements and internationally recognized standards, such as the "International Guiding Principles for Biomedical Research Involving Animals" by the Council for International Organizations of Medical Sciences (CIOMS). Business Partners must treat animals humanely, minimizing stress, fear, and pain as much as possible.

Environmental And Climate Impact

Business Partners shall operate responsibly toward the environment and future generations by minimizing their environmental impact and proactively addressing climate challenges. They shall allow Polpharma Biologics International to use anonymized sustainability data related to supplied products or services for reporting, benchmarking, and auditing purposes.

Conscious Decisions and Active Approach

Business Partners shall integrate sustainability, social, responsibility, and high ethical standards into their strategies and operations. They are expected to assess and monitor environmental and climate impacts, set reduction targets, and minimize their footprint. This includes reducing carbon footprints, limiting high-emission technologies and products, and sustainably exploiting natural resources, particularly forests, while managing waste generation. Business Partners shall also consider environmental criteria when making decisions about development, technological process optimization, purchasing, and partnerships.

Environmental Requirements and Regulations

Business Partners must comply with all applicable environmental laws, regulations, international agreements, and best practices. They shall implement responsible resource management and maintain all required permits and licenses, which must be available for reviews upon request. Business Partners must also fulfill all administrative and registration obligations related to environmental protection and climate change prevention as required by law.

Emission of Pollutants into the Environment

Business Partners shall monitor, minimize, and continuously improve the management of emissions to air, water, and soil. They shall reduce environmental impacts and risks through effective preventive and intervention measures.

Protection of Natural Resources

Business Partners shall use natural resources efficiently and responsibly, ensuring long-term availability while respecting biodiversity, ecosystems, and the rights of local communities. They must minimize, or preferably eliminate, environmental and social impacts through monitoring, risk assessment, and continuous process improvement, and prioritize the use of lower-impact materials and technologies. Appropriate systems must be in place to prevent and mitigate spills or environmental harm affecting food production, water access, sanitation, or human health, and to remedy any resulting impacts.

Compliance Verification And Business Partner Support

Polpharma Biologics International reserves the right to audit Business Partners (including their subcontractors and value chains) to verify compliance with this Code. Business Partners shall fully cooperate with such audits, including those conducted by authorized third parties, subject to agreed cost-sharing and confidentiality terms. Failure to comply with Polpharma Biologics International's requirements outlined in the Code may result in the termination of agreements with the Business Partner. Repeated non-compliance with this Code, may result in corrective actions, suspension, or termination of the agreement. The escalation process shall be overseen by Compliance team and documented in accordance with internal procedures.

Polpharma Biologics International may support Business Partners in implementing this Code, particularly in implementing due diligence processes and integrating sustainability risks into risk management systems. Such support may include conducting training sessions or providing document templates.

Trade Sanctions And Exports Controls

Business Partners shall comply with applicable trade sanctions and export control laws, including but not limited to US, EU, Great Britain and Swiss trade sanctions laws. Polpharma Biologics International does not engage with people or companies that have been placed by governments on sanctioned party lists.

Business Partners shall:

- Confirm that neither they nor their affiliated companies, shareholders or directors have been previously, or are currently, placed on one of the following restricted parties lists: the U.S. List of Specially Designated Nationals ("SDNs") and Blocked Persons [19], maintained by the U.S. Treasury Department Office of Foreign Assets Control; the Debarred List and non-proliferation sanctions lists maintained by the U.S. State Department [20]; the EU Consolidated List of Designated Parties [21]; and the Sanctions Embargoes List of Switzerland [22].
- Confirm they are not currently owned, directly or indirectly, 50% or more, individually or in the aggregate, by one or more SDNs.
- Immediately inform Polpharma Biologics International by email (using the email address: pbi.legal@polpharmabiologics.ch) if during the course of dealings with Polpharma Biologics International: (i) they, their affiliated companies, shareholders or directors are placed on one of the restricted parties lists referenced above; or (ii) they become owned 50% or more, individually or in the aggregate, by one or more SDNs.

Information Disclosure

Attachments

- | | | |
|-------------------|------------------------|---|
| Anjan Selz | CEO | Signed by: |
| Emmanuelle Lepine | President of the Board | Firmado por: |
| | | Nombre del firmante: Emmanuelle Lepine
Motivo de la firma: Apruebo este documento
Hora de firma: 5/5/2026 2:24:07 PM CEST |

Information And Documents Referred To In This Code

Polpharma Biologics Code of Conduct International Bill of Human Rights, comprising:

1. Universal Declaration of Human Rights

EN: [Universal Declaration of Human Rights | United Nations](#)

2. International Covenant on Civil and Political Rights

EN: [International Covenant on Civil and Political Rights](#)

3. International Covenant on Economic, Social, and Cultural Rights

EN: [International Covenant on Economic, Social, and Cultural Rights](#)

4. European Convention on Human Rights

EN: [European Convention on Human Rights](#)

5. Convention on the Rights of the Child

EN: [Convention on the Rights of the Child](#)

6. Declaration of Helsinki

EN: [Declaration of Helsinki](#)

7. UN Guiding Principles on Business and Human Rights („UNGPs”)

EN: [UN Guiding Principles on Business and Human Rights \(„UNGPs”\)](#)

8. OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023 edition)

EN: [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct \(2023 edition\)](#)

9. ILO Declaration on Fundamental Principles and Rights at Work and Related Core Conventions

EN: [ILO Declaration on Fundamental Principles and Rights at Work and Related Core Conventions](#)

10. Convention No. 29 on Forced or Compulsory Labor

[Forced Labour Convention, 1930 \(No. 29\)](#)

11. Convention No. 87 on Freedom of Association and Protection of the Right to Organize

EN: [Freedom of Association and Protection of the Right to Organise Convention, 1948 \(No. 87\)](#)

12. Convention No. 98 on the Right to Organize and Collective Bargaining:

EN: [Right to Organise and Collective Bargaining Convention, 1949 \(No. 98\)](#)

13. Convention No. 100: Equal Remuneration for Men and Women Workers for Work of Equal Value:

EN: [Equal Remuneration Convention, 1951 \(No. 100\)](#)

14. Convention No. 105: Abolition of Forced Labor:

EN: [Equal Remuneration Convention, 1951 \(No. 100\)](#)

15. Convention No. 111: Discrimination in Respect of Employment and Occupation:

EN: [Discrimination \(Employment and Occupation\) Convention, 1958 \(No. 111\)](#)

16. Convention No. 138: Minimum Age for Admission to Employment:

EN: [Minimum Age Convention, 1973 \(No. 138\)](#)

17. Convention No. 182: Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour:

EN: [Worst Forms of Child Labour Convention, 1999 \(No. 182\)](#)

18. Transforming our World: The 2030 Agenda for Sustainable Development

EN: [Transforming our World: The 2030 Agenda for Sustainable Development](#)

19. Paris Agreement

EN: [Paris Agreement](#)

20. Directive 2022/2464 on Corporate Sustainability Reporting (CSRD)

EN: [Directive 2022/2464 on Corporate Sustainability Reporting \(CSRD\)](#)

21. Regulation 2020/852 on the Establishment of a Framework to Facilitate Sustainable Investments (EU Taxonomy)

EN: [Regulation 2020/852](#)

22. Regulation 2023/1115 on EU Market Access and Export of Products Associated with Deforestation (EUDR (European Union Deforestation Regulation))

EN: [Regulation 2023/1115](#)

23. Council for International Organizations of Medical Sciences (CIOMS)

EN: [Council for International Organizations of Medical Sciences \(CIOMS\)](#)

24. Good Clinical Practice (GCP)

EN: [Good Clinical Practice \(GCP\)](#)

25. Good Manufacturing Practice (GMP)

EN: [Good Manufacturing Practice \(GMP\)](#)

26. Good Distribution Practice (GDP)

EN: [Good Distribution Practice \(GDP\)](#)

27. Data integrity

–	MHRA GXP Data Integrity Guidance and Definitions; Revision 1: March 2018
–	WHO Guidance Document on Good Data and Record Management Practices
–	MHRA GMP Data Integrity Definitions and Guidance for Industry, March 2015
EMA Annex 11	Computerized Systems
EMA/INS/GCP/112288/2023	Guideline on computerized systems and electronic data in clinical trials
EMA/INS/GCP/467532/2019	Notice to sponsors on validation and qualification of computerized systems used in clinical trials

Polpharma Biologics International AG Anti-Corruption Policy

May 2026

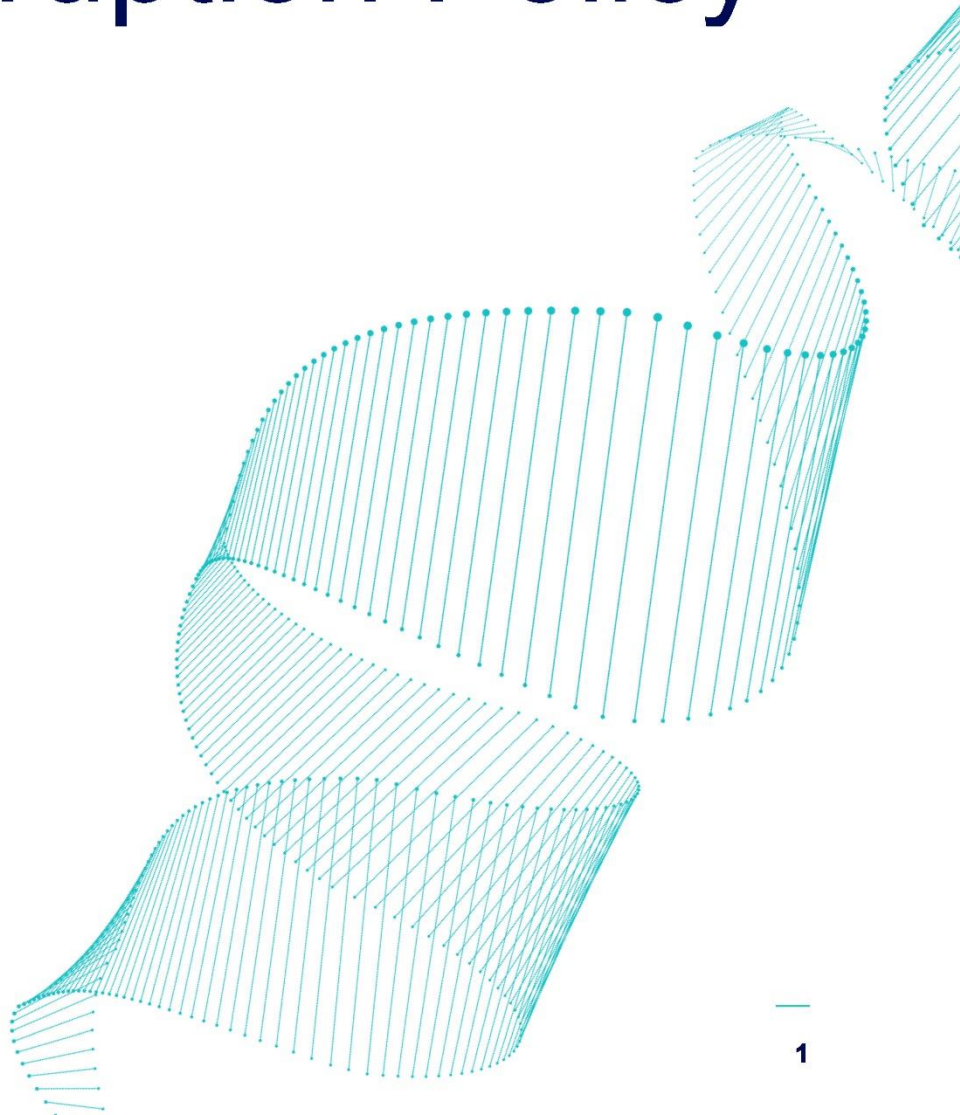


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Preamble

1. Polpharma Biologics International AG (PBI) conducts its business with integrity, fairness, and transparency. PBI strictly prohibits and condemns all forms of corruption and bribery, as defined in this Policy, at all organizational levels and across all business activities.
2. Corruption is a harmful practice that negatively affects social structures and economic processes. It undermines trust, impedes innovation and sustainable development, distorts fair competition, and creates barriers to market entry for new participants.
3. PBI maintains a zero-tolerance approach toward bribery and any improper attempt to influence decisions, whether direct or indirect, that is illegal or inconsistent with the principles of fair competition.
4. Corruption and bribery are not only contrary to the PBI Code of Conduct, as well as PBI principles and values, but may also constitute criminal offence under applicable laws and regulations.
5. To safeguard the reputation of PBI and ensure full compliance with applicable laws, all employees and business partners must exercise due care to ensure that their actions, even when undertaken in good faith, cannot be perceived as improper, unlawful, or as constituting bribery.

Abbreviations and Definitions

The abbreviations and definitions used in this Policy shall have the following meanings:

1. Policy: this Anti-Corruption Policy;
2. Company or PBI: Polpharma Biologics International AG
3. Employee: any individual performing work or services to the Company, regardless of the legal basis of employment or engagement. This includes, without limitation, agency workers, consultants, contractors, interns, secondees, apprentices, and any other representatives;
4. Collaborator: any PBI partner, supplier and customer (including candidates for such partners, suppliers and customers) as well as any other individual or entity collaborating with the Company, regardless of their location;
5. Director: a head of a department or an equivalent managerial position within the Company;
6. Business Partner: any individual or entity that cooperates with the Company or intends to establish a business relationship with the Company;
7. Benefit: any undue or improper advantage offered, promised, given, or received, directly or indirectly, for the purpose of influencing a business decision, inducing a person to act or refrain from acting, or otherwise securing an improper advantage. A Benefit may also be intended for close family members or associates of the recipient.

Anything of value to the recipient may constitute a Benefit, including, but not limited to, gifts, hospitality, services, employment opportunities for relatives, or preferential business arrangements. A Benefit may take the following forms:

- 7.1. Tangible Benefit: an increase in assets or avoidance of financial losses,
- 7.2. Non-tangible (personal) Benefit: a benefit in the case of which clear measurement of monetary value is difficult, but which often has subjective value for the recipient.
8. Corruption: any dishonest, improper, or fraudulent conduct involving the offering, promising, giving, requesting, or accepting of any financial or personal Benefit, whether directly or indirectly, including in particular:
 - 8.1. the offering, giving, authorizing, or promising of any Benefit to any person to obtain or retain a business advantage, influence a decision, or secure an improper advantage in the conduct of business;
 - 8.2. the requesting, accepting or receiving of any Benefit in exchange for an action or omission in the performance of a function related to the Company's business or activities carried out on behalf of the Company;
 - 8.3. any situation in which a Benefit is given or received with the intent to improperly influence a person's judgment, actions, or decision-making process, including inducing fraudulent or unethical behaviour;

- 8.4. corruption may take various forms and may therefore sometimes be difficult to recognize. It may occur in both the public (e.g. involving public officials or persons holding public office) and in the private sector (e.g. involving private individuals or employees working for the Company);
 - 8.5. the prohibition of corruption also includes any direct conduct, including the offering or provision of Benefits through third parties acting for or on behalf of the Company (e.g. agents, intermediaries, consultants, or other representatives);
 - 8.6. corruption may involve the giving or receiving something of value and can take various forms. This includes, but is not limited to, cash payments, gift cards or vouchers, gifts, excessive or inappropriate hospitality, as well as direct or indirect donations;
 - 8.7. small payments or advantages, commonly referred to as “facilitation payments”, may also constitute corruption. Such payments typically involve providing anything of value to a public official to initiate, expedite, or secure the performance of a routine or administrative action;
 - 8.8. bribery also includes offering, promising, or granting preferential treatment or any form of undue advantage (including future or contingent benefits) to any person, or otherwise improperly influencing a decision-making process, to obtain, retain, or direct business or cooperation for or on behalf of the Company.
9. Public Official (PO):
- Any individual who holds a public function or exercises public authority, whether appointed, elected, or otherwise designated, including in particular:
- 9.1. any person who, by virtue of their professional position or responsibilities related to the exercise of public authority, is subject to specific legal protections and obligations under applicable criminal law;
 - 9.2. any member of a national, regional, or local government authority;
 - 9.3. any person employed by or acting on behalf of an entity that manages or disposes of public funds, unless such person exclusively performs service activities (e.g. cleaning or security staff);
 - 9.4. any other individual whose powers and duties in the field of performing a public function are defined or recognized by a law or an international agreement;
 - 9.5. the definition of a PO shall be interpreted broadly, meaning that any person whose close family members are public officials having the ability, actual or implied, to influence or make official decisions affecting the activity of the Company is considered a public official;
 - 9.6. in the case of doubt as to whether an individual qualifies as a PO, employees shall contact the Legal function via email: pbi.legal@polpharmabiologics.ch.
10. Gifts: any items or benefits of value offered to a person as a gesture of goodwill, courtesy, or in accordance with customary business practices, without the expectation of receiving anything in return. Gifts may include so-called ‘occasional gifts’, such as low-value items provided on culturally recognized occasions or at specific times of the year (e.g. Christmas), as well as promotional items.
11. Healthcare Professional (HCP): any person authorized to practice in the medical, dental, dietetic, nursing professions or any other person who, during his or her professional activities, may prescribe, provide, purchase, supply, recommend or administer health care services or products. For the purposes of this Policy, HCP shall also be considered POs, due to their potential influence over healthcare-related decisions.

Purpose

The purpose of this Policy is to:

1. prevent corruption by promoting a zero-tolerance approach to corruption and any perception of corruption, and by prohibiting all forms of participation in corrupt activities by Employees, Collaborators, and any third parties acting for or on behalf of the Company;
2. strengthen the organizational culture of the Company by aligning the company's anti corruption standards with market standards;
3. strengthen anti-corruption measures at the Company by supporting Employees and Collaborators in establishing relationships based on professionalism, trust, skills and transparency.

Subject Matter of the Policy and its Scope of Application

1. This Policy relates to PBI as single entity. In respect of the Company, it covers all operations globally, regardless of location or role, and applies to interactions with both public and private sector individuals. The Policy extends to any transaction that could be perceived as a bribe or corrupt influence, whether conducted directly or indirectly.
2. Notwithstanding the above, this Policy does not govern activities relating to drug promotion, which are subject to specific laws, regulations, industry codes, and internal policies dedicated to pharmaceutical promotion and interactions with healthcare professionals (such as, for example, the Directive 2001/83/EC on pharmaceutical legislation, the Swiss Therapeutic Products Act (HMG) and related ordinances, the European Federation of Pharmaceutical Industries and Associations (EFPIA) pharma codes). For the avoidance of doubt, this exclusion does not limit or exclude the application of any mandatory anti corruption, criminal, or administrative laws (such as, for example, the Swiss criminal law), which apply at all times and irrespective of the scope of this Policy.

Responsibility

1. The Management Board of the Company supervises the implementation of this Policy, including communicating it to the and amending it if necessary.
2. Every Employee and Collaborator is required to familiarize themselves with this Policy and is responsible for compliance with the principles arising from it. Where applicable, the requirements of this Policy shall be contractually extended to third parties involved in activities within the scope of this Policy.
3. All functions and departments are involved in the implementation of this Policy.
4. In the event of any doubts or questions regarding issues related to this Policy, Employees and Collaborators shall contact the Legal function via email: pbi.legal@polpharmabiologics.ch.

Core Principles

1. The Company adheres to a strict zero-tolerance approach to corruption. Under no circumstances shall an Employee or Collaborator engage in, authorize, offer, promise, request, or accept any form of corrupt activity. The Company strictly prohibits the offering, giving, receiving, or soliciting of any form of bribe, kickback, or improper payment. This includes, but is not limited to, cash, gifts, hospitality, favours, or anything of value offered with the intent of gaining an undue advantage or influence business decisions.

2. Business and professional relationships must not be based on, or give rise to, any expectation of personal gain or Benefit (e.g. consisting in receiving any form of direct and indirect remuneration or other Benefits rewarding decisions made by an Employee or Collaborator of the Company).
3. Employees and Collaborators must not engage in any form of corrupt activity, whether directly or indirectly. They must not use intermediaries such as agents, consultants, advisors or other Business Partners to take any measures aimed at bribery or exerting improper influence in any other manner.
4. Before offering, giving, or promising anything of value, Employees and Collaborators must assess whether such action could be perceived as having an improper or unlawful purpose. If there is any risk of such perception, the action must not be undertaken.
5. All Employees and Collaborators of the Company must understand the risk a conflict of interests poses for the organization, act solely for its Benefit and avoid situations where a conflict of interests might arise.
6. As a biotechnology company, PBI is committed to contributing positively to society and supporting the communities in which it operates. Charitable contributions and donations are permitted and encouraged, if they are made in a transparent, lawful, and professional manner and cannot be perceived as instances of corruption.
7. In case of any doubt, Employees and Collaborators must seek guidance from the Legal function before taking any action or making any decision.

Facilitation Payments

1. Facilitation payments, defined as small payments or advantages made to secure or expedite routine actions by POs, are considered a form of bribery and are therefore strictly prohibited by the Company.
2. Payments to public authorities or state institutions may only be made where they are lawful, officially required, and properly documented. Such payments must be made directly to the official bank account of the relevant institution (and not to any personal account), must be supported by an official receipt or invoice, and must be accurately and transparently recorded in the Company's books and records.

Gifts and Hospitality

1. Gifts, hospitality and entertainment must always be modest, reasonable, adequate and sporadic, and must comply with applicable laws, regulations, and accepted business practices.
2. Before offering or providing any Gift, hospitality, or entertainment, Employees and Collaborators shall assess whether such action could adversely affect the reputation of the Company or any of the involved parties or could be perceived as improper.
3. Gifts, hospitality and entertainment must never be promised, provided or offered with the intent of influencing a decision, obtaining an improper advantage, rewarding inappropriate conduct, or inducing the recipient to act (or refrain from acting) in a manner favourable to the Company.
4. Employees and Collaborators are prohibited from providing or offering cash or cash equivalents to the Company's Business Partners. Only low-value business Gifts that are lawful and consistent with standard business practices may be provided, and only if they are occasional or promotional in nature and do not create any expectation of reciprocity or obligations. Under no circumstances should the value of such Gifts exceed CHF 50.- or the equivalent of this amount in other currencies.
5. It is strictly forbidden to give HCPs and members of their families Gifts of any kind, including occasional Gifts, tokens of acknowledgement or gratitude. It is permitted to give HCPs advertisements of a medicinal product according to the local European Federation of Pharmaceutical Industries and Associations (EFPIA) codes available on the official website <https://www.efpia.eu/relationships-code/national-codes/>
6. It is strictly forbidden to give cash and Gifts which are cash equivalents (e.g. shopping vouchers).

7. No entertainment can be provided to any participant of business meetings, congresses or other events organized by PBI unless the entertainment component is an insignificant part of these events.
8. No additional or extended trips that are not directly related to the performance of professional duties or services for the Company shall be paid for.
9. The Company does not cover entertainment, hospitality or travel expenses for persons accompanying Business Partners to the Company's business meetings.
10. Employees and Collaborators may only accept Gifts or hospitality from current or potential Business Partners if they are lawful, customary, reasonable in value (as referred to in Section 8.4 above), and occasional or promotional in nature (e.g. sweets, small branded items, stationery). Such Gifts or hospitality must not create any obligation, expectation of reciprocity, or influence (or appear to influence) business decisions.

Reporting Irregularities

1. An Employee or Collaborator who was a witness to, is aware of or suspects irregularities should report them by selecting one of the following reporting channels established at PBI:
 - 1.1. E-mail: pbi.legal@polpharmabiologics.ch
2. Reports can be made anonymously if preferred and will be treated with strict confidentiality. The Company ensures that all reports will be investigated promptly, fairly, and thoroughly. Employees are encouraged to speak up without fear of retaliation, as protection against retaliation is a core component of this policy.
3. An Employee submitting a report may also do it in person (depending on their choice), through the Head of Legal or Head of P&O.

Related Documents

1. Code of Conduct and Third Party Code of Conduct.

Awareness and Non-Compliance

1. This policy forms an integral part of the Employee handbook. All Company employees have therefore an obligation to read and comply with this Policy, to understand and identify any red flags that may arise and to escalate potential compliance concerns relating to anti-corruption and bribery to the Legal function. Managers are responsible for reinforcing awareness and setting the tone for ethical conduct.
2. Any violation of this Policy will result in disciplinary action, up to and including termination of employment. Where necessary, legal authorities will be notified. The Company may also terminate relationships with third parties who breach this Policy.

Update, Review and Ownership of this Policy

1. This Policy document is owned by PBI. It is subject to regular review and update from time to time to ensure its continued relevance and compliance with applicable laws, regulations, and best practices.



Anjan Selz	CEO	Signed by:
Emmanuelle Lepine	President of the Board	Firmado por: Nombre del firmante: Emmanuelle Lepine Motivo de la firma: Apruebo este documento Hora de firma: 4/30/2026 11:15:21 AM CEST A853B20F5B054CD5BFAC190E442EAF8A