

Code of Business conduct

July 2025

A foreword of the CEO's.

The launch of the Besins Values in autumn 2023 was the occasion for the Besins Healthcare Group to state that beyond being focused on bringing economic value to the Group, we also put “Values” at the heart of the way we do business. Because we are a company with a long history, we wished to reaffirm the Family values that guide leadership and the conduct of business in our Group. This code of business conduct aims at explicating the core foundations of the ethics of the Group, by referring them to our core “Besins Values”.

Together, we wish to make Besins Healthcare a “permanent startup” with its energy, while enjoying the strength of tradition and family values on which our company was built.

1. Code of Conduct

- **To whom does the Code apply?**

All employees, consultants, partners, in the Besins Healthcare Group worldwide

Management has a duty to ensure that this Code is known, understood and respected by all staff for whom they are responsible.

- **What does the Code contain?**

Rules that BH aims to follow in running its business worldwide.

These rules are of strict interpretation.

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A. Generalities and availability of the Code

Language of the Code: English is the Master Version. Standard translations in local languages are available.

Distribution of the Code: All employees to be given Code in English plus local language version in electronic version.

B. How will the Code be rolled out?

Circulated to the Besins Healthcare Group in July 2025.

C. Communication and training:

Regions / Countries need to ensure this Code is understood in local context.

D. Implementation

What is Compliance?

Compliance requires that conduct of all BH employees conforms with the Group's compliance codes and applicable laws in their respective jurisdictions.

Violations will be subject to consequences.

Concerns and complaints should be reported to manager or Legal Department/compliance.

This Code guarantees anonymity as per the Whistleblower protection policy (GLAD POL 007).

E. Values Management

The Values influence the way in which the Company wishes its members and employees behave. It strengthens the identity of the organisation and the spirit in which activities are undertaken.

At Besins Healthcare the Values, the Code of Business Conduct and the various Compliance Policies all complement each other.

Sections of the Code

- **Introduction**

This Code of Business Conduct has been adopted by the Board and approved by the CEO's of the Besins Healthcare Group. It is based on the Values adopted in 2023 and organizes the principles and practices that guide business conduct of the Besins Healthcare Group (the "BH Group"). This Code reflects the objective of the BH Group to reinforce group-wide ethical standards and to maintain a

work environment that fosters integrity, respect and fairness. It is the conviction of the CEO's that the long-term interests of the BH Group are best served by following the policy strictly to be lawful, highly principled and socially responsible in all business activities.

This Code is applicable to all employees worldwide.

1. We are "Trustworthy": we comply with laws, rules and regulations.

The Besins Healthcare Group acts in a heavily regulated sector and it naturally endeavors to conduct its business in compliance with applicable laws, rules and regulations. Being "Trustworthy" is key to its performance reputation with patients and regulatory authorities. The Besins Healthcare Group also undertakes to comply with industry codes that apply to the pharmaceutical industry. The Besins Healthcare Group's reputation for trustworthiness is based on this commitment and helps to ensure its long-term success.

2. We are "Passionate" about Corporate Responsibility

The Besins Healthcare Group is "passionate" about its business and the world in which it operates.

The Besins Healthcare Group carries out efforts to respect the principles of sustainable development.

The health and safety of all employees, neighbours, customers, consumers and others affected by its business activities, as well as the protection of the environment are at the core of its functioning.

The Besins Healthcare Group strives to ensure that its processes, technologies and products meet all applicable regulatory or Company standards, whichever are more stringent. Quality management is an integral part of all operations.

3. We work with "Integrity": Anti-corruption

The Besins Healthcare Group values "integrity" and thus strongly opposes corruption and bribery and does not tolerate practices that seek to obtain business through improper means. No Besins Healthcare Group employee is allowed to offer, receive or accept any kind of benefit to or from business partners or Government officials which might compromise, or appear to compromise, the ability to make objective and fair business decisions. Similarly, no Besins Healthcare Group employee is allowed to enter into business dealings which create a conflict of interest with the interests of the Group.

4. We are "Caring": Fair Working Conditions

The Besins Healthcare Group is an "Open-minded" and "Caring" employer and recognizes its employees as its greatest assets. The Group seeks high commitment from its employees and in

return it makes sure they receive all the chances they need to develop within the Group. The Besins Healthcare Group is committed to provide a safe work environment that values diversity and the richness of international culture. Human resource policies and activities of the Besins Healthcare Group should contribute to create a workplace where each individual has the opportunity for professional and personal growth. BH respects each individual and promotes an open exchange of views, criticisms and ideas.

The Besins Healthcare Group is committed to provide equal employment opportunities to all individuals and does not tolerate illegal discrimination. The Besins Healthcare Group has zero tolerance for harassment of any kind. Threats or acts of violence and physical intimidation are forbidden. Specific policies are deployed to prevent and address cases of harassment and violation of these policies is a cause for disciplinary action, including and up to termination. Similarly, to provide a safe working environment, the use of any kind of drugs which affect performance or behaviour in the workplace is not tolerated and is a cause for termination. We also strive to fight against slavery, among others via the implementation of the Anti-Slavery Policy which each employee is responsible to enforce.

5. We are “Open-Minded”: open to innovation

As a company with innovation and tradition at its heart, we are open-minded to new solutions, trailblazing proposals, innovation and new paths in research and in the way we do business.

6. We are “Entrepreneurial”: we approach business as a daily adventure

As a company which has long been known among its employees as the „Permanent Start-Up“, we value the energy and initiative of employees who go beyond their scope and seek to improve the business or explore uncharted territory with an explorer mindset. We value reasonable risk-taking and encourage employees to suggest new ways to improve the business.

7. We are “Better Together”: we value collaboration and cooperation

As a pharmaceutical group producing its own products, cooperation between departments and with partners is vital to our success. We take it one step further, as being “Better Together” is highlighted by interdisciplinary cooperation on all the topics, and seamless communication in our group.

8. How are our values translated into practical rules?

A_i Conflict.of.Interest

A “conflict of interest” exists when a person has a private interest that differs from that of the Besins Healthcare Group.

The biggest danger for Integrity among employees are the situations of Conflict of Interests. Conflicts of interest can arise in many situations including the following which require special attention:

Employees should not receive improper personal benefits as a result of their position in the Besins Healthcare Group or otherwise gain personal enrichment through their access to confidential information.

All employees have a duty to foster and advocate for the legitimate interests of the Besins Healthcare Group when the opportunity to do so arises. They should not take advantage of opportunities or use corporate property, information or their position for personal gain, nor compete with the Company directly or indirectly.

The Besins Healthcare Group values civil and political engagement, but serves a large spectrum of patients, across and beyond any ideological or political divide. To this end, the Besins Healthcare Group observes a strict position of neutrality in the public sphere and avoids any conflict of interest between its employees and political interests or movements.

Employees should not serve as directors, managers, employees or advisers of any outside business organization when this would adversely affect their motivation or performance, unless such service is specifically approved by the Company.

Any conflict or potential conflict of interest should be reported and discussed with appropriate superiors.

B_i Record_keeping.and.Reporting

The Besins Healthcare Group applies the highest standards in the recording of information, as within the Pharmaceutical industry, being Trustworthy has an especially strong meaning. All financial statements and books, records and accounts of the Group - whether held electronically or in print - must reflect transactions and events accurately and conform both to legal requirements and accounting principles and also to the Company's system of internal accounting. Dishonest reporting within the Company, or to organizations or persons outside the Company, is strictly prohibited and punishable with immediate termination.

C_i .Protection.and.Proper.Use.of.Assets

Collectively, each employee must see him or herself as an "entrepreneur" and hence take upon themselves the responsibility for making decisions, taking actions and safeguarding and making proper and efficient use of the Besins Healthcare Group property. Each employee also has an obligation to protect BH's property from loss, damage, misuse, theft, embezzlement or destruction. Any situations or incidents that could lead to such result, should be reported by employees immediately to their supervisor or manager.

D_i Confidentiality.and.Privacy

Information is one of the Besins Healthcare Group's most valuable corporate assets, and open and effective dissemination of information is critical to its success. However, much of the Group's business information is confidential or proprietary, and such confidentiality must be maintained except when disclosure is authorized by BH or required by laws or regulations.

These rules apply specifically to intellectual property, such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing know-how, designs, databases, records, salary information or any unpublished financial data and reports.

Furthermore, it is the Besins Healthcare Group's policy that all personal information on employees, patients, customers, business partners or suppliers be used diligently and treated confidentially, respecting fully all privacy rights. The protection of such information is of the highest importance and must be discharged with the greatest care to justify the confidence placed in the Besins Healthcare Group.

9. Concerns or complaints

If an employee has concerns or complaints about the matters covered in this Code, including possible violations of the Code, he/she should submit them promptly to their supervisor for resolution. This can be done anonymously, confidentially or otherwise. If the resolution is not satisfactory to the employee or he/she feels it is not appropriate to address the concern or complaint to their supervisor, it should be submitted to the Compliance Officer in their local business unit, or if this is not practicable, to the Global Legal Affairs Department in Dubai, UAE.

10. Accountability

All employees are required to comply with the standards set forth in this Code. Violations of the Code will lead to consequences. In serious cases such consequences may include removal from office and termination of employment.

11. Employees reporting

Concerns, complaints or violations:

Direct superior and/or Head of Department of subsidiary

- Referral if escalation necessary: Regional or functional management or Compliance Committee or General Counsel

Concerns, complaints and violations can be made anonymously, confidentially or otherwise. Please refer to the Whistleblower Protection Policy (GLAD POL 007).

Retaliatory actions based on complaints made in good faith are prohibited. Complaints made maliciously and/or wrongly and/or based on lies or with a harmful intent are punishable as a disciplinary violation.

CEOs Signatures

Nicolas Besins

Signed by:
Nicolas Besins

 Signer Name: Nicolas Besins
Signing Reason: I approve this document
Signing Time: 02 July 2025 | 2:57:32 PM CEST
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Alexandre Besins

Signed by:
Alexandre Besins

 Signer Name: Alexandre Besins
Signing Reason: I approve this document
Signing Time: 02 July 2025 | 2:54:34 PM CEST
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