

Code of Conduct: Key Principles at a Glance

1. Our Commitment – Health, Wellbeing and Responsibility

GL Pharma is dedicated to growth by ensuring the safety and wellbeing of employees and the environment, complying with EU and national laws, and upholding ethical standards. This Code of Conduct ensures sustainable corporate success and risk prevention. We follow a “Long Term Value” concept and require cooperation from all managers, employees, suppliers, dealers, customers, and other business partners. The Code of Conduct also references additional national and international codes of conduct, such as the PHARMIG Code of Conduct (www.pharmig.at/media/3100/pharmig-code-of-conduct-072020.pdf), Medicines for Europe Code of Conduct (https://www.medicinesforeurope.com/wp-content/uploads/2023/11/Medicines-for-Europe_Code-of-Conduct.pdf), and EFPIA Code of Practice (<https://www.efpia.eu/media/mjreejiu/efpia-code-of-practice.pdf>).

2. Governance in Compliance with Legal and Moral Requirements

We comply with all applicable laws and do not tolerate illegal actions. Employees must report any violations to management or use the whistleblower hotline. Illegal actions can lead to prosecution, loss of reputation, and financial penalties. We also require third parties with whom we have business relationships to comply with relevant legal requirements.

3. Ethics and Compliance with Business Law

We support free and fair competition, prohibit bribery and corruption, and ensure lawful supplier relationships. We adhere to international trade regulations and prohibit money laundering. Employees must avoid conflicts of interest and report any unethical behavior. Specific guidelines include prohibiting illegal agreements on prices and conditions, avoiding kick-back payments, and ensuring that sponsorships and donations support humanitarian aid or medical and pharmaceutical sciences without expecting a return on investment.

4. Human Rights

We respect the rights of all employees, ensure health and safety, prohibit child labor, and promote equal opportunities. Discrimination based on gender, race, origin, age, social affiliation, sexual orientation, pregnancy, physical or mental impairment, or political affiliation is not tolerated. We provide safe workplaces and working conditions and comply with all legal requirements for health and safety.

5. Leadership

We foster a culture of trust, respect, and continuous improvement. Managers act as role models and ensure compliance with the Code of Conduct. We value ideas and contributions from all colleagues and promote a climate of partnership in the workplace. Harassment, intimidation, hostility, humiliation, or insults of any kind are not tolerated. We encourage open communication and constructive feedback to address conflicts and improve performance.

6. Environmental Protection, Product and Occupational Safety

We promote green technologies, follow sustainability standards, and ensure the safety of our products and processes. We are committed to resource conservation, energy saving, and environmental protection. Our pharmacovigilance system ensures the benefits of our medicines outweigh the risks. We also focus on avoiding environmental damage during the manufacturing process, minimizing emissions, and using resources efficiently.

7. Conflicts of Interest, Company Assets and Confidentiality

Employees must separate business and private interests, protect intellectual property, and use company resources responsibly. Confidential information should only be used for internal purposes and not shared with third parties. Outside employment and secondary business activities require management approval. Employees must handle company property carefully and avoid wasteful behavior. We ensure responsible data handling and cybersecurity.

8. Company Representation and Corporate Image

Official statements about GL Pharma are made by authorized representatives. Employees must differentiate between personal opinions and official company statements. We cooperate with regulatory investigations and ensure that our public behavior positively reflects GL Pharma. Employees should avoid discussing company internals in public or with strangers.

Please note: This document is a summary of the GL Pharma Code of Conduct. For the complete and detailed version of the Code of Conduct, please contact the management or request a copy from the relevant department.