



CODE of CONDUCT

Dear colleagues,

Our corporate conduct is shaped by our awareness of our responsibilities and ethical principles. Therefore, our day-to-day actions are crucial to Formycon's business success. This Code of conduct helps us to act responsibly in carrying out our daily tasks and make the right decisions. Acting responsibly and doing the right thing in this context specifically means lawful conduct.

Together, we are doing everything we can to prevent and avoid breaching applicable laws. This means that we must always remember the risks and consequences that any legal breaches can entail - both for Formycon as a company and for the employees involved. In addition, just the semblance of conduct that is contrary to regulations may negatively impact the business interests of Formycon. The consequences of our conduct must therefore also be measured in terms of the impact on the reputation and integrity of Formycon, its employees and the Management Board.

We must constantly observe, assess, and manage the legal risks that fall under the scope of our business liability. The aim is to prevent conduct that is not compliant with regulations, to detect it and

respond appropriately in the event of any (alleged) breach in order to avoid any further breaches of a similar kind. In order to achieve this, both the Management Board and employees as well as all relevant regulations and processes are comprehensively integrated into this Code of Conduct.

This means that our conduct must always comply with the applicable laws and sector guidelines, as well as Formycon's internal standards. Formycon has therefore set up a comprehensive Compliance Management System (CMS) that we are determined to implement and enforce.

By doing so, FORMYCON is placing a high value on a culture of mutual trust which is intended to encourage an open and free exchange of views at and beyond all levels of the corporate hierarchy. Having an open-minded working environment is fundamental to our success. By maintaining open dialogue and by actively participating, you can make a crucial contribution.

If you have any concerns about proper conduct, you can always seek confidential help and advice. If, in your working environment, you notice any behavior that you consider to be ethically or legally questionable, address this openly and without

passing any judgement. It won't do you any harm!
Take some time to read our Code of Conduct,
refer to it and let it guide you in your day-to day
working life. We are personally fully committed to
following his Code of Conduct and are supporting
all initiatives that contribute to the success of our
compliance culture.

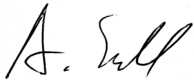
We are counting on your support!



Dr Stefan Glombitza



Nicola Mikulcik



Dr. Andreas Seidl



Enno Spillner



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INTRODUCTION





All bodies, employees and all those who are employed on behalf of Formycon are obliged to comply with our Code of Conduct irrespective of where they work or the area of activity. Formycon complies with applicable laws and expects the same from its business partners and employees. Therefore, compliance with our Code of Conduct is a key contractual basis for working together.

This Code of Conduct does not relieve us of our personal responsibility to judge and act independently and deliberately. If you have any concerns with regard to proper conduct, seek help and advice.

Formycon will not tolerate any breaches, either of this Code of Conduct or of any applicable law and will investigate any incident that does not comply with these principles. You need to be aware that any breach may have serious consequences for Formycon and for yourself. In the event of a serious breach, this may lead to termination without notice.

This Code of Conduct is used to provide guidance for dealing with compliance risks and specifies key points of particular practical relevance.

A. Principles of responsibly working at Formycon

Protection of our knowledge advantage and protection of the industrial property rights of third parties

Trade and business secrets are treated strictly confidentially. They may only be disclosed if the operational interests require the disclosure and if sufficient confidentiality can be ensured at the recipient's end. Employee inventions or improvements are also treated in confidence and the competent body is informed immediately. Third-party property rights are respected in all forms.

Cooperative dealings with authorities

Formycon is cooperative in its dealings with all responsible authorities. Information is provided in full, openly, in good time and in a way that is understandable. All data and documents used must absolutely comply with the requirements of data integrity. Communication with the authorities must exclusively occur through the responsible department internally and be documented in full. Any other departments concerned will be included in the communication in a timely manner.



Fairness in competition

Formycon affirms without limitation that it practices fair competition and strictly complies with anti-trust legislation. Any suspected incidents are reported without exception and are comprehensively investigated.

Integrity in business

Bribery, corruption or accepting or granting undue advantage regardless of its nature is not tolerated as part of Formycon's business activity. Any suspected incidents are reported without exception and fully investigated.

Separating corporate and private interests

Formycon's employees always separate private interests from those of the company. All decisions must be made based on purely objective criteria and be transparent. This applies particularly to HR decisions or business relationships with third parties. Conflicts of interest must be avoided at all costs and disclosed should they arise.

Respect of equal opportunities in securities trading/reporting

Within the scope of Formycon's activity, undisclosed information that has been acquired and may have a significant impact on the stock price must be treated in strictest confidence, may not be used for trading, or forwarded as such to recommend trading to third parties. The aforementioned information will be forwarded immediately and without alteration to the internal department responsible when it first occurs.

Data protection and data security

The protection & security of both personal and other operational data, is assured in all areas. Retention and deletion obligations are observed independently. In principle, the communication of information of any kind is on a need-to-know basis. Potential data loss is prevented by appropriate rules of conduct; any actual or alleged data losses are to be immediately reported to the post responsible.



Principle of Environmental, Health and Safety

Formycon is aware of its responsibility to protect the environment as well as the health and safety of individuals. For this reason, supervisors and employees always prioritize the avoidance of environmental and health hazards when structuring their work and selecting and using operating resources and materials.

Compliance for data processing and financial reporting

All business processes are traceable and documented according to their relevance for Formycon and in compliance with regulation. Their complete and correct recording is ensured by regular internal controls. If these business processes contain invoicing information, this information is stored in read-only format.



Fair and respectful behavior

All employees are expected to treat colleagues and third parties in a kind, objective, fair and respectful manner at all times. Discrimination and harassment of any kind is not tolerated, even if this is not directly related to employment at Formycon.

B. Applying our principles

To avoid breaches of laws and regulation, Formycon provides its employees with the necessary sources of information, training and advice in order to detect infringements of laws and regulations at an early stage and so avoid them.

Formycon is continuously training its employees in handling compliance-related risks and regularly adjusts this Code of Conduct to any amended legal and technical framework conditions.

Each superior organizes his or her area in such a way that compliance with legal and regulatory provisions, the guidelines of this Code of Conduct as well as other corporate rules, is always transparent and guaranteed.

- Any infringements of the law and breaches of this Code of Conduct must be reported immediately.

C. Self-regulation

This Code of Conduct is not exhaustive. In your everyday working life, you will no doubt encounter issues that are referenced here or in other documents (e.g., guidelines, instructions, provisions), but not explicitly answered.

If you are unsure, you should firstly ask yourself the following questions:

1. Is my conduct lawful?
2. Does it comply with the values of Formycon?
3. Could it have a negative effect for Formycon or for me?
4. Would it matter to me if it were published in a newspaper or other form of media?

This is often enough to provide guidance.



D. Responsibilities

If you have any remaining doubts, you are to seek help and advice. Questions and suggestions are always welcome. Formycon is reliant on your help to address compliance-related issues quickly and reliably. In speaking up about your concerns, you are helping to protect yourself, your colleagues or Formycon against any negative consequences of the breaching of rules. An overview of the responsible departments and corresponding contact persons can be found in GUI-00025 (Attachment 1 Formycon AG Code of Conduct Responsibilities).





**HOW DO I BEHAVE
CORRECTLY?**

In the event of any questions arising in the context of your work, you should use your own judgement and common sense.

If you observe that someone is breaching legal provisions, this Code of Conduct or the values contained therein in relation to a process in which Formycon is involved, you should communicate your concerns. Such information can also be provided anonymously (see section 3 Who do I contact and how do I report concerns).

Sometimes, it may seem easier not to get involved, but the potential harm may be greater as a result and you may even make yourself jointly responsible. It is only by addressing a problem that is it possible for help to be provided and potential harm to be averted.

If you deal openly with a problem, you will receive the support you need from Formycon. Care will be taken to ensure that you do not face any adverse effects by reporting this. Any attempt to discriminate against any employee who openly expresses his or her concern represents a serious breach of this Code of Conduct.

Everyone is expected to:

- Ensure that our business conduct complies with applicable laws, sector guidelines, internal standards, and this Code of Conduct.
- Constantly and adequately identify, assess and manage the compliance risks that fall within the sphere of our business responsibilities.





**WHO DO I CONTACT
AND HOW DO I
REPORT CONCERNS?**

- Appropriate handling of non-compliant incidents is a key part of our corporate culture. Formycon makes every effort to handle such incidents appropriately and all allegations are taken seriously,
- Allegations are investigated efficiently and in a timely manner,
- Facts are assessed objectively and without bias,
- The appropriate corrective measures are taken and sanctions imposed if the allegations are founded.

You are explicitly encouraged to be attentive and alert regarding our compliance with internal and external rules.

If you suspect any illicit behavior or have any reservations or questions about a certain conduct, do not hesitate to contact the following persons:

- your direct superior,
- our Compliance Officer,
- the responsible departments and corresponding contact persons in GUI-00025 (Attachment 1 Formycon AG Code of Conduct Responsibilities).

Furthermore, you can report your concerns through our Whistleblowing Tool and remain anonymous if you wish. Our Whistleblowing Tool complies with the highest standards of protecting your identity and the security of the information transmitted.

To access the Whistleblowing Tool and contribute to maintaining a healthy organizational culture, please visit Formycon AG I Home (integrityline.com). Here you'll find all relevant information on how to make a report in detail.

In addition, you can always also use external reporting channels. The reporting channels include:

- Bundesamt für Justiz (Federal Office of Justice) - Externe Meldestelle (Startseite - Externe Meldestelle (Bundesamt für Justiz Schlichtungsverfahren),
- Bundesamt für Finanzdienstleistungsaufsicht (BaFin) - Zugang zur Hinweisgeberstelle (BaFin - Zugang zur Hinweisgeberstelle),
- Bundeskartellamt - Einführung (Federal Cartel Office) (Einführung (bkms-system.net)).

Everyone is expected to make sure that we:

- Do everything possible to prevent non-compliant conduct,
- Immediately report all concerns,
- Take appropriate corrective action and impose sanctions when we as Senior Management are confronted with non-compliant conduct.





**HOW DO I PROTECT OUR
EXPERTISE ADVANTAGE?**



Our expertise is crucial to the financial success of Formycon. Confidential information such as scientific know-how and product materials make up Formycon's most valuable assets. They are company property and are legally protected as business and trade secrets. In this respect, you are obliged to maintain confidentiality; this shall also apply after the termination of your employment with Formycon.

Business and trade secrets include all materials, data and information that are not publicly accessible and as a result represent a highly valued asset for the company or its competitors. This also includes, in particular information exclusively available to Formycon.

This especially applies to all data and information that Formycon has not publicly disclosed via a press release. This must always be treated as confidential.

Confidential information includes among other things:

- All data and information relating to research and development projects, including the de-

- signation or other means of identification of the projects,
- Production processes,
- Information on inventions, research results and test data,
- Agreements with business partners, such as licensing and collaborative partnerships and service providers,
- Names of service providers and other collaborative partnerships and/or the circumstance of the business relationship with these,
- Business plans,
- Finance data,
- Investment plans,
- Earnings forecasts,
- Sales & Marketing strategies,
- Market launches of new products,
- Employee data,
- Organization chart,
- Customer and supplier lists,
- Service provider prices and prices negotiated for the company,
- Salary and wage documentation.

We must be aware that, in an environment shaped by the competition, third parties will attempt to gain access to confidential information or material. Third party competitive intelligence activities are common practice in our sector.

This means that we need to be very careful in public places such as airports, trains, bars, and restaurants when handling confidential information. Take care to prevent third parties from listening in or reading alongside.

If electronic communication devices, such as mobile telephones, smartphones, laptops, computers or handhelds on which Formycon's confidential data is saved are stolen or lost in another way, please write a message to helpdesk@Formycon.com or contact the responsible department for this topic immediately.

In relation to the use of electronic forms of communication, data protection is not unconditionally guaranteed; it may be rescinded in accordance with the applicable data protection regulations.

In certain cases, it may be necessary to disclose confidential information and material to external parties. This may sometimes be the case when

Formycon relies on the cooperation of external companies or as part of due diligence. In this case, disclosure takes place following prior approval by the Board and in compliance with the appropriate privacy measures.

If we pass confidential information on to third parties, such an exchange of information must, in each case, be secured by signing a non-disclosure agreement in advance. When sharing any materials, legal agreements must be concluded in advance, as required.


Disclosure is always on a need-to-know basis; this means that no more information will be revealed than is absolutely necessary.

Furthermore, be aware that details regarding your employment on social media, like Xing or LinkedIn, could lead to conclusions being drawn about Formycon's business activities. Therefore, you must always make sure that no confidential information is revealed. This applies, for example, to references to individual projects, processes, molecules, or methods used. In this respect, it may also involve legitimate business and trade secrets that are not intended to be disclosed.

Formycon supports employee innovations and strives to further strengthen its position by filing patents. Therefore, please report any inventions and improvements you make in the course of your work. Formycon can incorporate such employee inventions in individual cases in return for appropriate remuneration.

Everyone is expected to make sure that we:

- Pass on confidential information and/or materials only to relevant persons that are entitled to receive it and that are obliged to maintain confidentiality,
- Only share confidential information with third parties once a non-disclosure agreement has been signed,
- Are aware of the competitive intelligence activities of third parties that could harm Formycon's assets and interests,
- Comply with the contractual non-disclosure duties, even once the employment relationship has ended,
- Register job-related inventions.



**HOW DO I SUPPORT
OPERATIONAL DATA
PROTECTION AND
INFORMATION SECURITY?**

In your day-to-day role, you work not only with data, which is classified as a business and trade secret, but also with information from various sources that may be publicly accessible but that was provided to you for your specific role at Formycon and/or for a specific purpose (e.g., contact data of business partners and employees or general product information from suppliers).

This data is subject, insofar as it relates to „personal data“, to legal protection and may not be used or shared without restriction. Personal data is any information which can be uniquely attributed directly or indirectly to a particular natural person. In protecting this data, the rules of the General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (Bundesdatenschutzgesetz) in particular must be observed.

Furthermore, freely available data may also allow conclusions to be drawn relating to Formycon's business activity that we do not wish to disclose, e.g. to our competitors. It is therefore important to prevent unauthorized third parties from obtaining this information, irrespective of any legal interest in protection.



We therefore prevent data and/or information from being passed on to unauthorized third parties, even if this data and/or information is publicly accessible from other sources or is not classified as a trade secret by:

- exclusively using personal data for its intended purposes,
- not using any external hardware in the Formycon IT infrastructure,
- not installing any external software in the Formycon IT infrastructure without authorization,
- making information and data carriers safe from unauthorized access by third parties and destroying or formatting these as soon as possible, so they are impossible for unauthorized parties to use,
- not using any publicly accessible networks to communicate company data.

In addition, compliance with SOP-00093 IT Security and System Management must be observed.

Everyone is expected to take all reasonable steps to prevent personal and business data and/or information from leaving Formycon's sphere of influence unintentionally and coming to the knowledge of unauthorized persons.

HANDLING INTELLECTUAL PROPERTY AND COPYRIGHTS OF THIRD PARTIES





Formycon respects the business and trade secrets and information protected by copyright of third parties. This includes any written documents, software, patents and other intellectual property.

Breaches of intellectual property can have serious consequences for Formycon and you personally, as well as triggering significant claims for damages and entailing raids on the business premises by authorities, including seizure of documents, materials, and products.

Everyone is expected to make sure that we:

- Respect the patents and brands of third parties and do not use them without approval.
- Do not attempt to gain or use the confidential information of third parties without permission.
- Do not install any unauthorized software on our computers in the workplace.
- Do not copy documents or computer software protected by copyright without the appropriate permission.
- Do not include any copyrighted material in any documents created by us without citing the source. Here, it must be assumed that all publications, even on the Internet, are normally protected by copyright.

**HOW DO I COMMUNICATE
APPROPRIATELY?**



Due to e-mail, social media, and other communication channels communication within Formycon and with external parties has become simple and convenient. But the risks associated with this are obvious: Easy communication channels and informal language can lead to carelessness in the way we communicate and, above all, in what we communicate.

Incorrect or ambiguous information given to customers or the public, can harm the credibility of Formycon and lead to serious legal consequences.

Details about Formycon, such as its products and services, must be presented accurately, openly, and fairly. Denigrating competitors is counter to regulations. We do not make any statements to our customers that may discredit our competitors or their products in an unlawful manner.

This is why we use communications systems (such as email, Microsoft Teams, Zoom etc.) and social media (e.g. Xing, LinkedIn, Instagram etc.) with due care and attention.

Before communicating any information to a customer or to the public (regardless which system or platform you use) you should carefully consider what it is that you want to communicate, how and to whom, since after the event the words may be misconstrued or misinterpreted by third parties.

Furthermore, we often handle sensitive and confidential information. That is why we should always check that this kind of information is not accidentally disclosed. Regardless, whether we are communicating internally or externally, we only share critical business information with people who are entitled and absolutely need to know it.

Also be aware that Formycon does not use an encrypted e-mail application. With the appropriate technical tools, Emails may therefore be read like a postcard by anyone - metaphorically speaking.

Equally, messages sent via other communication channels (e.g. MS Teams, Zoom etc.) are not protected and cannot be considered private and safe.

For this reason, Formycon has set up what are known as „data rooms“ if there is a particular need for confidentiality. Details can be found in Formycons Data Usage Guideline.

Whenever you are posting on social media, be aware that you can be perceived as a representative of Formycon – even if you are using a personal profile.

That is why, if we express ourselves publicly about Formycon or any topic relating to our work, we always clarify that we are expressing our personal opinion.

Official statements about Formycon can only be made by authorized persons. If you receive any media inquiries, please refer them to the responsible department for this topic.

Everyone is expected to make sure that we:

- Do not disclose confidential or sensitive information. Before communicating we carefully consider what we are disclosing and make sure that we use the appropriate channels, e.g. a data room,
- Always carefully weigh up what we communicate to customers or the public. In doing so, we avoid wording that contains questionable statements and – without justification – may be interpreted as evidence of inappropriate or illegal conduct. After the event, texts may be misconstrued or misinterpreted by third parties,
- When posting on social media, we make sure to state that any opinions about Formycon or your work life there are your own,
- Refer all media inquiries to the responsible department for this topic.



**HOW SHOULD I BEHAVE
WHEN DEALING WITH
THE AUTHORITIES?**



Formycon is obliged to observe numerous regulatory provisions and regulations as a company working in drug development and production. Formycon employees therefore often work with international authorities and other official bodies.

Public officials are important stakeholders to Formycon. For example, they provide and maintain the necessary framework for economic stability, social cohesion, environmental protection, and access to health care for people. In this regard, a special position within Formycon is assigned to drug regulatory authorities responsible for approving the drugs developed by Formycon, as well as for monitoring quality standards and drug safety. All data and documents provided to these authorities are required to meet the requirements of data integrity (completeness, accuracy, and consistency).

It is Formycon's conviction that active dialogue and open interaction with public officials, based on integrity and responsibility, are important elements of a properly functioning public administration.

All employees who work with public officials must understand and observe our instructions in terms of their conduct with public officials.

If significant indications arise that the guidelines of this Code of Conduct have been breached, we will cooperate fully with the investigators and ensure that we present exonerating compliance evidence for our conduct, in compliance with the rules.



Everyone is expected to make sure that we:

- Work together with public officials, demonstrating openness, responsibility, and integrity. At the same time, we must pay careful attention to ensuring that we take all measures needed to safeguard the legitimate interests of Formycon.
- Ensure that all documents that are sent to authorities, and/or are relevant for official inquiries, meet the requirements of data and document integrity, are secured, and cannot be unlawfully modified, destroyed or removed.
- **Comply with the guidelines regarding integrity in business for all contact with public officials.**
- **Cooperate with investigators.**

HOW DO I SEPARATE CORPORATE AND PRIVATE INTERESTS?



Always behave in a loyal manner to Formycon. Our personal activities must not harm the interests of Formycon. You should avoid situations in which you would actually or even appear to breach your obligation of loyalty to Formycon.

If you wish to work for another company or set up your own business, normally you would need prior approval for this. Always be aware that:

- Such activities are not permitted to impair your obligations towards Formycon. Employees who pursue sideline activities must ensure that this additional work does not impair their ability to perform at Formycon.
- Work performed for a competitor is prohibited.
- Working for a customer or supplier raises the issue of an actual or potential conflict of interest. This also applies if the company concerned would like to set up as a competitor, customer or supplier.

You are free to get involved in non-profit organizations, political parties or other social institutions in your free time provided you do not breach your duties towards Formycon.

Everyone is expected to make sure that we:

- Avoid situations, in which our personal interests could conflict with those of Formycon,
- Do not unfairly exploit our position at Formycon to our personal advantage or to the advantage of any relatives or people close to us,
- Inform your superior immediately in the event of any actual or potential conflict of interest to find an appropriate solution.

HOW DO I NEED TO BEHAVE WHEN TRADING IN SECURITIES?

Formycon promotes open and fair capital markets by protecting non-public information from unintended disclosure and misuse. We comply with all applicable insider trading laws. Inside information is non-public information, which, if made public, would be likely to have a significant effect on the price of the related financial instrument. Misusing inside information relating to Formycon shares or related financial instruments, e.g. debt instruments or derivatives, or other publicly traded companies (insider trading), is prohibited. Insider trading comprises, among others, making use of inside information to trade in financial instruments or recommending that another person makes use of inside information. It is also prohibited to unlawfully disclose inside information.

Formycon publishes inside information as soon as possible by way of ad hoc releases in accordance with its legal duties to avoid misuse of inside information unless it makes use of a delay of the publication of such inside information. To comply with statutory requirements, Formycon maintains and updates a list which contains the names of all those who possess inside information (insider list) and who – like any person who possesses inside information – must comply with the prohibition of insider trading.

Members of the Management Board and Supervisory Board of Formycon AG and those employees who have access to specific unpublished accounting data of Formycon (employees working in the finance department and employees eligible under the Formycon long-term incentive plans) may not (directly or indirectly) trade or recommend trading in Formycon shares or related financial instruments for their own account or for the account of a third party during the blackout periods for financial statements. The blackout periods for financial statements correspond to the blackout periods pursuant to Art. 19 para. 11 of the Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (market abuse regulation) which means 30 calendar days prior to the announcement of the half-year and year-end financial statements which Formycon is obliged to make public according to (i) the rules of the trading venue where Formycon shares are admitted to trading; or (b) national law. In addition to that, the blackout periods also comprise blackout periods of 15 calendar days before the announcement of a quarterly statement or a quarterly financial report.

Everyone is expected to make sure that we:

- Protect insider information,
- Do not carry out any insider trading to our own advantage or to the advantage of third parties,
- Observe the insider trading policy of Formycon AG,
- Contact the responsible department for this topic in the event of questions or doubts concerning the extent or area of scope of Formycon insider regulations.

**HOW DO I BEHAVE
FAIRLY WITH THE
COMPETITION?**



The quality of our work and our competitive ability in the market are crucial factors for our success. Our customers have a right to competitive market behavior, which ultimately also benefits each and every one of us as consumers.

Restricting free competition through illegal agreements or arrangements with our competitors is not only illegal, we also consider such conduct to be inexcusable and unprofessional.

Breaches of anti-trust law will have serious consequences, including high fines or even criminal convictions and prison sentences for those involved or those who have condoned such behavior.

Expressing concerns early and openly makes it possible to minimize any potential penalties. You must always be alert about what is discussed with our competitors at meetings, trade fairs, scientific congresses etc. You should immediately break off any talks which involve obstacles to free competition, such as pricing or cartel agreements. Leave the conversation and make sure that this is witnessed by other persons.

Contracts or agreements that may adversely affect competition and raise anti-trust issues should be reviewed in advance by a lawyer and approved by the responsible department for this topic and your superior. This applies in particular to:

- Joint ventures, purchasing agreements, marketing agreements or similar contracts with competitors
- Exclusivity arrangements in which another company is tied to buy solely from Formycon

Tying arrangements or bundling agreements under which a product is tied to the sale of another product.

Every employee connected with price setting or working in purchasing, marketing or sales or performing a role involving contact with our competitors must be aware of and understand our standards of conduct and the relevant competition laws.

Everyone is expected to make sure that we:

- Do not conclude any pricing arrangements with our competitors and do not exchange any information in this respect,
- Do not make agreements of any kind with our competitors with the aim of price-fixing, dividing up markets or customers or boycotting a customer or other market players,
- Do not manipulate the tendering process or make agreements to submit rigged bids.





**HOW DO WE
CAREFULLY SELECT
OUR SUPPLIERS?**

At Formycon, we recognize that in order to ensure an ethical production of our products, our responsibility extends to our business relationships. We expect our suppliers to conduct their business ethically correct and fair. This includes, but is not limited to:

- The prohibition of forced labor,
- The prohibition of child labor,
- Fair pay and fair working hours,
- Freedom of association,
- Freedom from discrimination,
- Health and safety in the workplace,
- Commitment to protect the environment,
- Respect for fair competition.

Everyone is expected to make sure that we:

- Familiarize ourselves with our Supplier Code of Conduct,
- If in doubt, immediately report to the responsible department for this topic to understand whether a contract can be concluded,
- Take immediate action if a breach of our Supplier Code of Conduct comes to our knowledge.





**HOW DO I GUARANTEE
INTEGRITY IN BUSINESS
CONDUCT?**

At Formycon, we attach great importance to maintaining good relationships with our customers, suppliers, and authorities. The only way to promote trust between partners is good social contact. Bribery and corruption are not tolerated when building sustainable relationships.

This applies regardless of whether private individuals, healthcare professionals or public officials are concerned. In the case of public officials, the criminal consequences are usually also higher. Furthermore, particular caution is required when granting benefits to healthcare professionals.

Please observe that any attempt to influence an official by offering personal benefits is punishable by law. The definition of the term „public official“ is very broad and encompasses, in particular, medical specialists and scientists if they are employed in public hospitals, universities etc. Bids, contractual relationships, and payments must therefore always be transparent and sufficiently documented.

If unclear, you must contact your superior or the responsible department to determine the actual status of your business partner as part of due diligence checking.

This should not only be done before contacting a new business partner, but also if you have concerns regarding an existing business relationship, for example, if your business partner asks you for unusual prices or payment terms. It may also be appropriate to ask a business partner for a written assurance that he or she is bound by a comparable Code of Conduct.

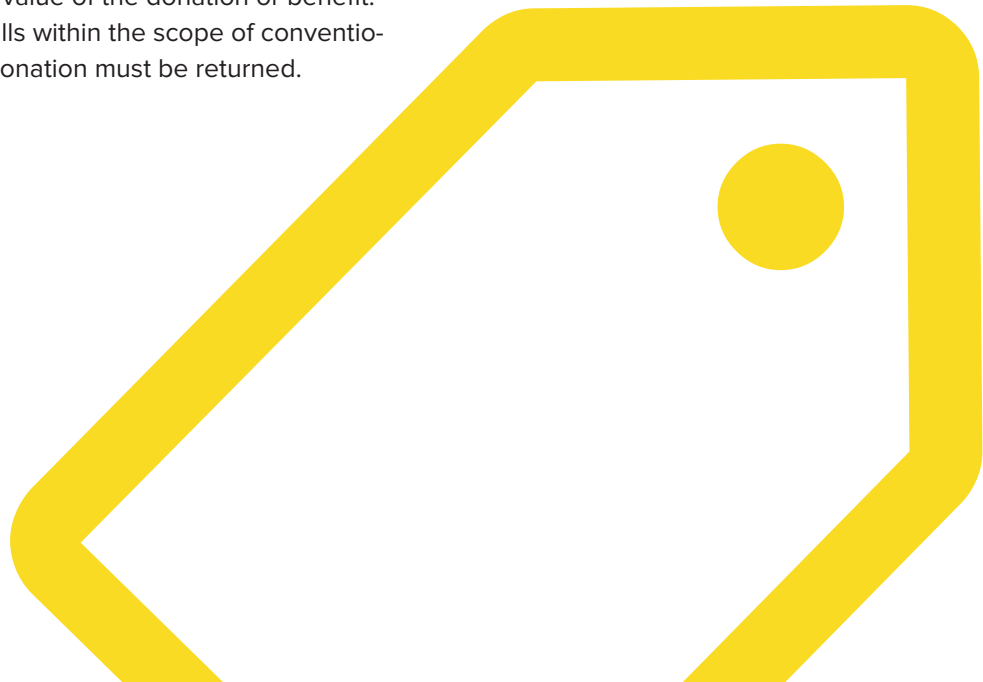
Familiarize yourself with the applicable conduct rules and internal regulations (such as our Anti-bribery and Anti-corruption Guideline) before entering business relationships.

A. Ban on accepting or granting of benefits

Offering or accepting financial benefits or gifts is prohibited if corresponding dealings could be construed as unlawful influence on decision making.

As an indication of unlawful influence of this kind, it should be considered whether the gift is being made in connection with the initiation of a business transaction or the conclusion of a business agreement over which the recipient has had or could have influence. A further indication is the material (counter) value of the donation or benefit. If this no longer falls within the scope of conventional practice, the donation must be returned.

You may not, under any circumstances, claim (monetary) gifts or personal favors from suppliers or customers with whom Formycon has business relationships either on your own behalf or on behalf of a third party. Gifts include not only material goods, but also services, commission payments or discounts on private purchases of goods and services.



B. Permitted gifts

If invitations or gifts are part of usual social contact between business partners, then the giving or acceptance thereof is permitted provided the nature or amount does not exceed conventional business practices, and these benefits do not cast doubt on the benefactor's or recipient's intentions (please see our Anti-bribery and Anti-corruption Guideline for more details of gifts and benefits).

Discounts or promotional rewards, as offered by airlines, hotels, car hire companies and restaurants, are normally permitted as long as they are based on a bonus program for members, and Formycon has not issued any guidelines to the contrary.

You should raise any concerns you have in this regard in good time and, in case of doubt, make the donation and the accompanying circumstances transparent. Frequently it is not clearly recognizable exactly what is permitted and what is not. If you are not sure, please contact the responsible department for this topic.

Everyone is expected to make sure that we:

- Never claim gifts or other benefits from the current or potential business partners of Formycon,
- Ensure that there could be no doubt as to the integrity and independence of Formycon by accepting gifts or other benefits,
- If in doubt, immediately report the donation to the responsible department for this topic to understand whether a gift or other benefit can be accepted,
- Do not give any gifts or benefits to third parties without first clearing it with a superior.

**HOW DO I PROTECT
THE SAFETY OF OUR
HEALTHCARE PRODUCTS?**



All our products are intended to promote patients' health and wellbeing. Therefore, we systematically monitor the safety of our products. Information on the risks and benefits of our products is always up to date.

As an integral part, any information relating to the safety of our product, e.g. potential side effects, is processed as quickly as possible.

This means, that any relevant information is transmitted immediately, but at the latest on the next day to the department responsible for this topic.

Everyone is expected to make sure that we:

- Take all concerns regarding the safety of a product seriously,
- Respond to information relating to the safety of our products immediately, at the latest the next day,
- Transmit the obtained information to the department responsible for this topic.



HOW DO I PROTECT HEALTH, SAFETY AND THE ENVIRONMENT?

It is very important to us to create safe, healthy working conditions. Safety aspects and environmental issues can greatly influence our well-being and our day-to-day living conditions. We therefore make sure that all provisions and company guidelines governing issues relating to health, safety, and the environment are known and adhered to.

Formycon strives to continuously develop health and safety protection and has set up an occupational safety management system for this.

Support us in implementing it by immediately reporting any safety-related events.

Everyone is expected to make sure that we:

- Follow all safety provisions including risk assessments,
- Report accidents to the responsible contact point straight away,
- Identify weak points in our safety standards with regards to occupational health and safety as well as to environmental protection and propose improvements,
- Report any breach and all safety failings in working conditions and concerning protection of the environment
- Take the environmental impacts of our actions into account (please also see our Environmental Policy)





**HOW DO I CONTRIBUTE
TO FAIR AND RESPECTFUL
WORKING CONDITIONS?**

Having a good working environment is key to success and efficiency. The way we behave towards our colleagues and third parties reflects our corporate culture.

Therefore, we treat each other with mutual respect and fairness and honor our colleagues' right to privacy and dignity. We do not tolerate any discrimination based on gender, ethnic origin, color of skin, nationality, age, religion, sexual orientation, disability or any other reasons. We recruit, train, and develop our employees in line with these principles.

Verbal remarks or behavior that incite aggression or hostility in the workplace and seek to insult other employees will not be tolerated.

If you feel you have suffered discrimination or harassment, advise the person concerned that this behavior is unacceptable and insulting. If you do not wish to speak to the person concerned yourself, you can always contact the responsible department for this topic.

Alternatively, you can always flag the behavior in question through our Whistleblowing Tool and voice your concerns. If you wish, you can remain anonymous. Regardless which channel you use and who you report to, you will not face any negative consequences as a result.

Everyone is expected to make sure that we:

- Recognize and use diversity as an asset and opportunity, act, and work without any discrimination,
- Report cases of discrimination or harassment in the workplace when we observe them.



**HOW DO I PROTECT
HUMAN RIGHTS AND
THE ENVIRONMENT?**

Formycon is committed to compliance with international conventions on the protection of human rights, labor standards, agreements on the protection of nature and health and the ban on the handling of certain substances.

This includes the following principles in particular:

- **Prohibition of forced labor:** Formycon does not accept forced labor, slavery, slavery-like practices, servitude or other forms of domination or oppression in the workplace environment, such as extreme economic or sexual exploitation and humiliation.
- **Prohibition of child labor:** Formycon rejects child labor and especially the worst forms of it. Formycon comply with the recommendation in the ILO conventions on the minimum age for the employment of children.
- **Fair pay:** Remuneration for regular working hours and overtime must comply with the national statutory minimum wage or the customary minimum remuneration for the industry, whichever is higher.
- **Fair working hours:** Formycon complies with applicable local laws and ILO regulations on working hours.
- **Freedom of association:** Formycon respects the right of employees to form or join organizations of their choosing and to engage in collective bargaining and strikes.
- **Preservation of livelihoods linked to natural resources:** Formycon will not, in violation of legitimate rights, extract resources from land, forests or waters, whose use secures the livelihood of people.
- **Treatment of waste:** Local regulations and laws governing the generation, storage, disposal and recycling of waste, waste gases and wastewater will be observed, in particular the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, as amended.
- **Use of natural resources and consumption of raw materials:** Natural resources will be used sparingly and preserved as far as possible. The use and consumption of resources during production and the generation of waste of any kind, including water and energy, will be reduced, or avoided.

- **Environmental Protection:** Formycon complies with local environmental laws, regulations, and standards, such as RoHS and REACH.
- **Dealing with conflict minerals and hazardous substances:** The production of mercury-added products and the use of mercury and mercury compounds in manufacturing processes as defined in the Minamata Convention of 10 October 2013 is prohibited. Similarly, Formycon is not using or producing persistent organic pollutants or chemicals that are banned at national or international level, in particular by the Stockholm Convention of 23 May 2001.

Everyone is expected to make sure that we:

- Adhere to the above-mentioned principles and observe them at all times.
- Report misconduct to the responsible department for this topic.



OBLIGATION

The Formycon Code of Conduct is more than just a collection of regulations. It forms the basis of our daily work at Formycon. Strict adherence to the Code is crucial to the business success of Formycon and therefore to the professional security of all employees. Our Code of Conduct applies to Formycon AG as well as to its subsidiaries, all employees and to the Board.

Formycon will not tolerate any unlawful conduct! The exclusive purpose of the Code of Conduct is to protect Formycon. Employees, functionaries, Board and Supervisory Board members must comply with the guidelines and principles of our Code of Conduct.

Breaches can have grave consequences and in serious cases may lead to the termination of employment without a notice period. If Formycon (and its affiliates) is held liable as a result of any breach of this Code of Conduct, Formycon may hold the perpetrator liable and seek damages from him or her.

Formycon AG

