



Code of Conduct CO.DON GmbH

A Introduction

CO.DON GmbH (“Company”) competes fairly and aims for market success by means of its employees, its innovation, the quality of its products and the dependability and compliance of its manufacturing and supply chain.

In its business activities the Company respects applicable legislation, and it expects the same from its employees and business partners. Unlawful behaviour can cause great economic damage. Even the appearance of breaking the law may impair the Company’s market position. The consequences of your own conduct must therefore also be measured by how they effect the Company’s reputation as well as the integrity of its employees and management.

Another important pillar of the Company’s success is a committed, motivated corporate culture, which is supported by the responsible and ethical conduct of every single employee. The corporate values, respect, enthusiasm, confidence and decisiveness represent firm guidelines for the day-to-day work and behaviour of all Company staff. A committed, motivated and responsible corporate culture also requires an undertaking to act with integrity in business dealings.

All activities must therefore be based on a clear understanding of the statutory and regulatory framework, the Company’s internal policies and our joint values.

The following rules describe the context for implementing the Company’s objectives in everyday work. In this context it is not only the results that count, but also how they are achieved. This code of conduct therefore makes it easier to comply with legal provisions and internal policies. It is not a complete compendium of all the obligations for all the legal systems in which the Company operates, however. Employees are therefore obliged to obtain competent advice if they are in any doubt. Managers and the specialist departments, especially e.g. the HR and legal department are available to answer any questions.

Corporate values

respect, enthusiasm,
confidence and decisiveness

B Principles

Employees

Staff administration

The Company's conduct towards its (also potential and future) employees is defined by respect and fairness. The Company respects the personality of its staff and rejects any form of harassment and discrimination.

No one may be disadvantaged or preferred, harassed or excluded because of their nationality, ethnic origin, skin colour, age or appearance, sex, disability, sexual identity, religion or world view.

Data protection and the use of electronic media

The Company undertakes to treat personal data confidentially and only to collect, process and store it in accordance with the applicable data protection regulations. The Company has appointed an external data protection officer to whom all employees can address their questions and comments.

The current contact data are:

Mr Jens Krügermann
E: Jens.Kruegermann@kpp-group.de
T: +49 (0) 30 206 737 2280

Insofar as the Company provides access to and the use of electronic media for business purposes, such electronic media may not be used for purposes that run counter to legislation, regulations, instructions, policies or other Company rules.

Conduct in the Company

Tolerance, respect, objectivity and fairness must be applied when dealing with one another and third parties. This also applies to dealings with and in social media.

Employees must separate their private interests from those of the Company at all times.

B Principles

Business Practices and Liability

Fair competition

The company only competes fairly and without any illegal collusion, and undertakes in particular to comply with competition law.

Handling of trade secrets and industrial property rights

Trade secrets must be protected against third-party access.

Environmental and health protection

The Company is committed to protecting the environment and human health.

Cooperation with public authorities

Regulatory obligations towards the competent authorities must be met. The Company attaches importance to good and a cooperative relations with all competent authorities. Information must therefore be conveyed in full, correctly and in good time.

Pharmaceutical safety

As a pharmaceutical company, the manufacture and marketing of safe, effective products has priority. The Company expects its employees to commit themselves to the quality and safety of the products. In particular this means that all employees who become aware of information relating to the quality or safety of a product must forward it without delay to the pharmaceutical vigilance department.

Bribery and corruption

Bribery and corruption are forbidden and will not be tolerated by the Company. The Company's acceptance, business operations and reputation as a trustworthy market participant must not be jeopardised by these criminal offences.

Receiving and giving other benefits

No employee may demand, accept, offer or give personal benefits in connection with their professional activities. No employee may accept or receive gifts from business partners or other third parties if this

has an inappropriate influence on business decisions or could be interpreted as such. If there are any questions on the proper dealings with gifts or offers of entertainment, employees are to ask their manager or the legal department.

Cooperation with professional groups

As a pharmaceutical company it is particularly important to work with clinicians, pharmacists and other members of professional groups and their institutions. At the interface between the medically indicated use of the projects and entrepreneurial activities, working relations must always be organised to avoid any impression that the cooperation with members of professional groups and medical institutions could jeopardise the neutrality and independence of those involved. When working with members of professional groups and their institutions, the principles of separation, transparency, equivalence and documentation must be followed. It is therefore forbidden to unfairly influence, grant benefits or provide incentives for any therapy, prescription or purchasing decisions by members of professional groups. Unfair is in particular any conduct in breach of the German Criminal Code (StGB), Medical Products Advertising Act (HWG) or the Act Against Unfair Competition (UWG).

Lobbying

The Company is party-politically neutral, but does participate in legitimate ways in political debates and processes that are relevant to the Company, its sector, its products and its customers.

Money laundering

Channelling assets from criminal activities into the legal financial and economic cycle while obscuring their true origins, and other money laundering activities in Germany and abroad are prohibited.

Export

All national and international customs, export and foreign trade regulations must be followed.

B Principles

Reporting and Documentation

Financial reporting and documentation obligations

All commercial transactions must be documented appropriately and truthfully. Information relevant to accounting and tax must be documented correctly and in full. Statutory and regulatory filing requirements must be met.

Dealings with media and government agencies

Questions from the press, media representatives, freelance journalists etc., from government agencies and public authorities may only be answered by employees who have been specifically authorised to do so.

C Legal Consequences of Non-Compliance

Breaches of this code of conduct will not be tolerated and may have disciplinary consequences, including dismissal, as well as claims for civil damages and prosecution.

D Raise your concerns

Any violation of the Code of Conduct as well as other rules and regulations can have severe consequences for the Company, its employees as well as business partners. Reporting concerns and leads can help uncover possible violations at an early stage as well as initiate appropriate measures, thereby protecting the previously named parties.

The Company guarantees that no employee who reports irregularities or suspicious circumstances responsibly will suffer any loss or other discrimination as a result. All incoming leads will be treated confidentially. The Company takes care to protect the whistleblower and the person(s) affected by a report. Every report will be pursued and, if necessary, appropriate steps will be taken. Intentionally false or misleading reports or information are strictly forbidden. The Company reserves the right to take appropriate action against the author in the event that an untrue or misleading report is submitted against better judgement.

The Company encourages employees to first contact their Managers or specialist departments, in particular the HR department, if they have any concerns or questions.

Another channel to raise concerns is the CO.DON Integrity Channel. The reporting channel is available to CO.DON employees, business partners and any other person around the clock and regardless of location. Reports can be made by name or anonymously.



Link to CO.DON Integrity Channel
<https://codon.integrityline.app/>

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