

Code of **Ethics**



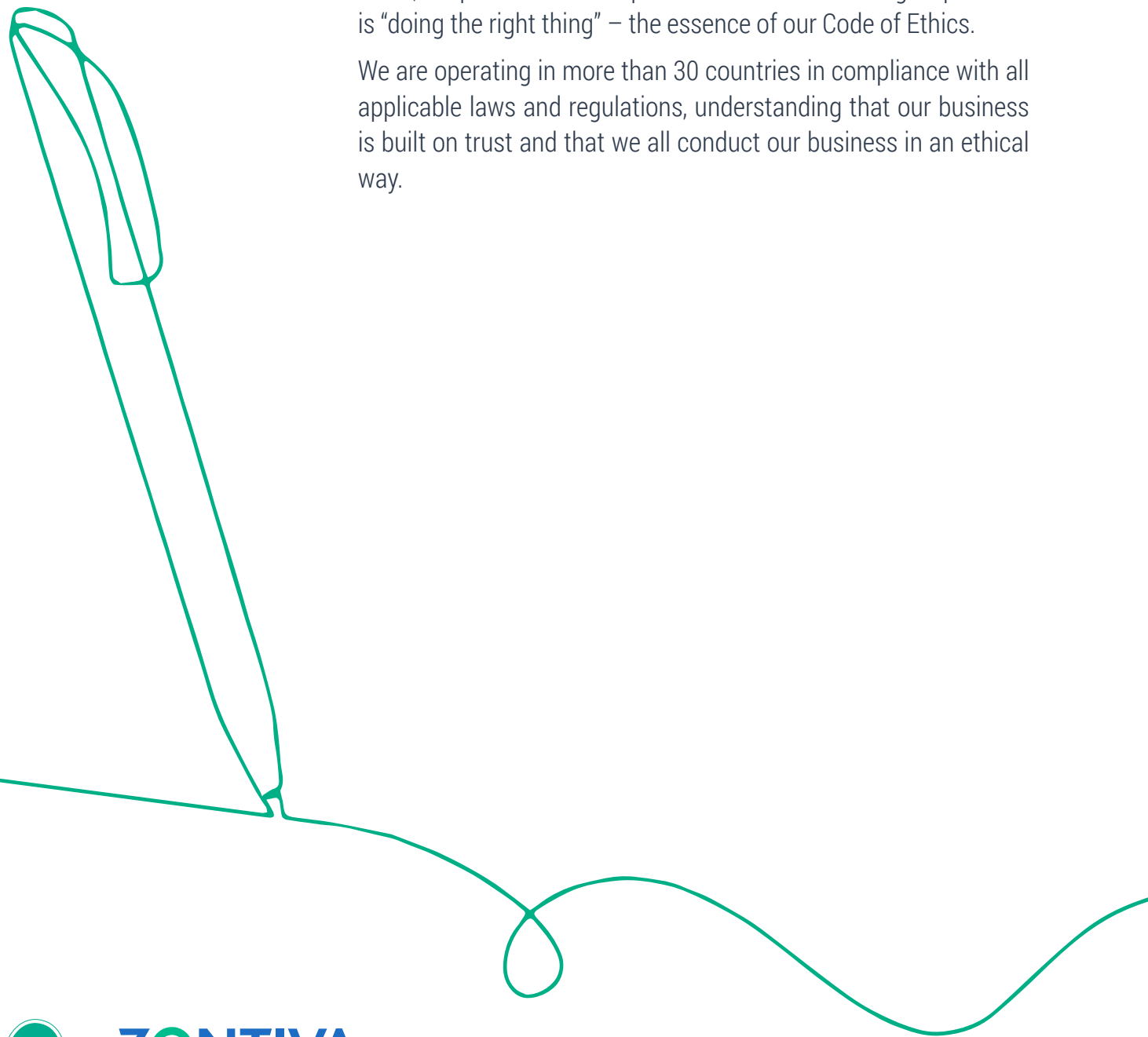
ZENTIVA

Our Code of Ethics
FOREWORDS

At Zentiva, we have committed to delivering high-quality and affordable medicines to the people who depend on them every day.

We make a difference in lives of more than 100 millions of people as we develop, produce and serve our products. We are aware of our responsibility and taking care of our people and the people we serve, our partners and our planet. At the heart of being responsible is “doing the right thing” – the essence of our Code of Ethics.

We are operating in more than 30 countries in compliance with all applicable laws and regulations, understanding that our business is built on trust and that we all conduct our business in an ethical way.



Message

FROM THE CEO

“ Every member of our Zentiva team brings to bear their unique talents focused on fulfilling our purpose – to ensure the supply of high-quality and affordable medicines to the people who depend on them every day. When Zentiva does well, more people get the medicines they need. We make a significant contribution to public health in Europe and beyond. This is our motivation to deliver.

In business, as in life, you only have one reputation – so take good care of it. The decisions and choices we each make today will be judged by today’s standards, but will also be judged by future standards.

One poor decision can undermine years of excellence, so at Zentiva we ask each of our team members to conduct every activity in a compliant way; but also to look forwards. If you are unsure, take advice from your colleagues and the leadership of our core functions in Legal, Compliance, HR, Quality and Finance. If you see something in our company that does not feel right – speak up with confidence.

Zentiva has an excellent compliance track record and we are proud of what we have achieved. Let’s look forwards and build the company we want to become, raise the bar and the standards and be a role model in the healthcare industry, so that people and partners trust us that we do the right things. ”

Steffen Saltofte
CEO - Zentiva



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Our Purpose, our Values,
OUR CODE

At Zentiva, we are bonded together by our common purpose to provide health and wellbeing for all generations and to help people live well through the development and supply of high-quality, affordable prescription medicines and consumer brands.

Every pack of medicine that we deliver increases the number of people receiving the best therapy for their medical needs, helps to increase healthcare standards and contributes to the sustainability of healthcare systems now and for the generations to come.

Our Values (**accountability, authenticity, courage, collaboration** and **trust**) together with our purpose and this Code help us make good choices, navigate challenges and have pride in what we do.

This Code guides us through every decision we make, regardless of how small it seems. We act in line with our values which are put into action through this Code.

The Code is applicable to all Zentiva employees and everyone who acts on behalf of Zentiva. It summarizes basic principles and outlines key areas which are under the supervision of different functions within our Company.

Violating a company's Code of Ethics can result in disciplinary action, including warnings, suspension, termination, or legal consequences, impacting reputation and trust.

We operate in line with applicable codes of practices that are active in countries where we conduct our business. Zentiva is also a member of the Medicines for Europe industry association and follows its **Code of Conduct**. Zentiva's memberships are publicly available on our website.





Our Commitment to

PEOPLE, QUALITY & SAFETY

At Zentiva, the safety of all people we serve is paramount. People, healthcare professionals, trading partners, regulators and governments trust the medicines that Zentiva produces.

1.1 Quality and Safety of Our Medicines

We commit to ensuring that all our medicines meet the high quality and safety standards expected by our stakeholders and embedded in our marketing authorisations and product dossiers.

We work in partnership with regulators and designated inspectors / quality organisations to ensure continued vigilance over the safety and efficacy of the medicines we supply. Our commitments are embedded in our Quality Policy prominently displayed in all our operational sites.

All Zentiva quality and safety standards, processes and systems are in compliance with good operating practices including good

clinical, laboratory, research, manufacturing, pharmacovigilance and distribution practices.

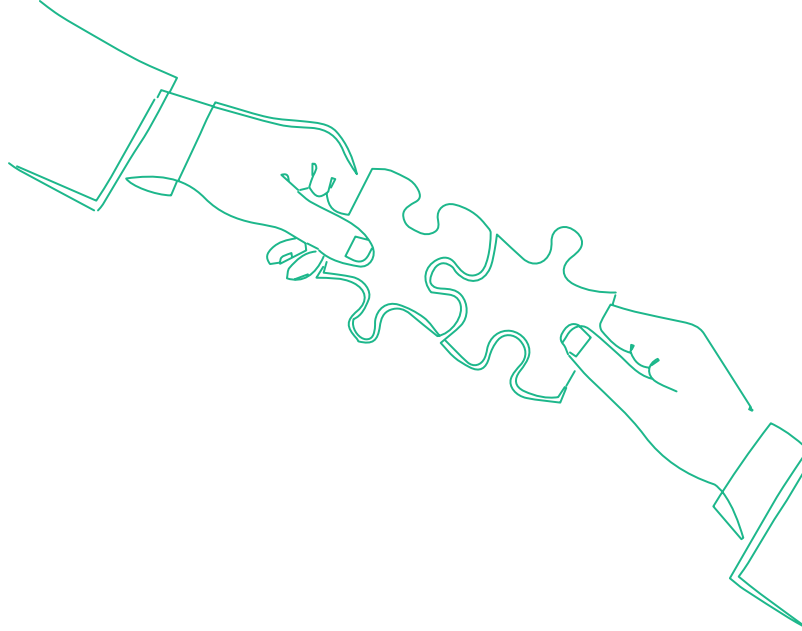
We maintain the quality and safety of all of our products and control these parameters on a regular basis. Every step is traceable and properly recorded to ensure that our medicines are safe for everyone.

We constantly strive for improvement. We review all feedback from partners and everyone, including comments, complaints and claims as part of our Pharmacovigilance and Safety monitoring. We work with regulators across Europe and beyond to respond to new issues and data detected across the wider healthcare system so that we can conduct risk assessments and introduce any identified and agreed corrective actions.

1.2 Cooperation with Patients and Patients Organisations

Direct interaction with patients, their families, advocates and patient organisations is an important part of uncovering healthcare needs.

Contact and working with patients and patient organisations is undertaken in a transparent way, in line with applicable local laws or regulations. Our interactions are educational and supportive but non-promotional.





Our

PEOPLE

At Zentiva, every one of us brings to bear our unique talents focused on one common purpose – to ensure open access to high-quality affordable medicines for the people who depend on them every day. Who we are, what we know and how we act is what makes us stand apart – with complementary ways of working built on strong foundations. Because we believe that healthcare should be a right and not a privilege, we support everyone and include everyone at same time. Being inclusive is already in our heads, in our hearts and in our hands!

2.1 Diversity and Non-Discrimination

We are proud of our diverse work environment. We respect the uniqueness of every person. We do not discriminate based on gender, gender identification, age, culture, religion, sexual orientation, physical appearance, ability, union affiliation or political and other opinions. Our workspace encourages everyone to be their true selves because we believe that authenticity and diversity are a source of great energy and strength.

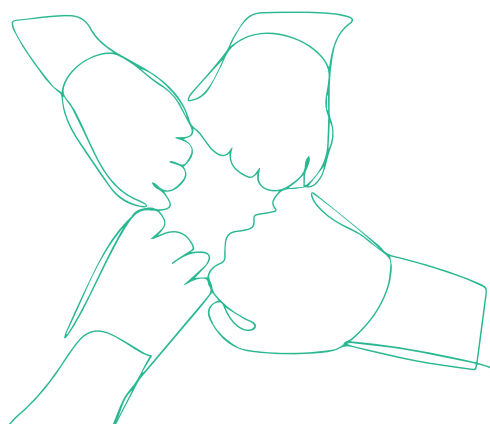
2.2 Human Rights

At Zentiva, we expect everyone to respect human rights. We do not tolerate any form of discrimination, harassment, retaliation, intimidation, humiliation, bullying, unfair treatment or inappropriate behaviour at any time.

We strive to improve our internal processes to identify and promptly address any risk in relation to respecting human rights across our operations. We have zero tolerance for any forms of modern slavery, forced work or human trafficking.

We compensate our employees fairly and in accordance with applicable legal requirements. We respect employees' right to be part of a labour union and we work side by side with the unions to achieve the best outcome for our people and our Company.

We respect every child's right to education and personal development and we do not tolerate any form of child labour.



2.3 Career and Personal Development

We believe that everyone in our team has talent and we are committed helping our employees learn and grow to unlock their strengths and turn it into the performance of our Company. We actively encourage personal development and career advancement – which is regularly reviewed as part of our Zentiva Talent and Development Program. Support for development and growth is conducted in a transparent way through 1:1 conversations and team reviews.

2.4 Safe and Healthy Workspace

We strongly support the wellbeing of our teams and work hard to protect and promote employees' safety and health. We comply with applicable workplace safety and industrial hygiene policies, laws, regulations and standards to ensure that everyone feels safe at work. We conduct routine risk assessments and encourage all our team to take ownership of health and safety. In this way we can continually look to reduce the risk of accidents in the workplace and ensure that controlling mechanisms are in place and effective. Zentiva champions the Health and Safety of its employees through regular awareness programs and our Health & Wellbeing Academy.

2.5 Insider Trading

On occasion it is possible that Zentiva employee(s) will be involved in projects where third party confidential information is shared with us under a confidentiality or non-disclosure agreement. All Zentiva employees are

bound to respect the terms of the confidentiality agreement until it expires. In addition where such information relates to a company whose shares are publicly traded, the extent to which the information is considered to be share-price sensitive will be reviewed. In the event of such information being considered share-price sensitive, a list of "Insiders" will be established and these individuals will be prohibited from directly or indirectly making any investments relating to that company for a pre-determined period of time.

Our employees are required to follow the Corporate Policy on Insider Trading.

Our employees are expected to act ethically and in accordance with the Zentiva Code of Ethics. We are all ambassadors of the Company and we all need to behave responsibly. In case of a breach of the Code of Ethics the employee(s) in question may be subject to disciplinary action. In serious cases a breach may result in dismissal and reporting the breach to the appropriate authorities.



Our IMPACT

Each new medicine that Zentiva launches reduces the price point of that medicine to healthcare systems in each country. There is overwhelming evidence that as competition increases and the price of medicines reduces, more people get access to that “gold-standard” medicine. This contribution to public health is enormous with Zentiva helping millions of people every year to live better, healthier lives while saving the healthcare system hundreds of millions of Euros.

We continually invest in R&D to develop bio-equivalent medicines for Europe and internationally while also working to improve the medicines for people, bring new medicines into combinations and bring forward innovative treatments to address unmet people needs.

3.1 Sustainability

We care for our people, our partners and our planet. At Zentiva, we provide health and wellbeing to all and ensure the supply of high quality and affordable medicines to people everyday. We do that in a healthy & sustainable way. We use ESG (Environmental, Social and Governance) as a tool to bring it to life.

We believe that people and the topic of sustainability must go hand in hand to get things moving. It all starts with every one of us changing the way we live to contribute to a healthier future so that next generations can enjoy the life on earth as much as we do.

With Accountability being embedded in our value system, we expect every member of our team and every partner we work with to respect our Sustainability strategy and operational agenda.

The heart of the Strategy is our Risk & Materiality Assessment that is built on an intense stakeholder dialogue. We committed as a team to the 17 Sustainable Development Goals that have been designed by the United Nations in cooperation with 193 member states and we strongly invest into environmental protection and biodiversity.

As a manufacturer of medicines we produce emissions and we have committed to lower them as much as technically possible and published our target to be carbon neutral in Scope 1 and Scope 2 by 2030. On top of that, we are investing into efficiency programs for energy, electricity, water and waste.

3.2 Research and Development

Our products reflect our innovative approach across the whole Company. We have a strong commitment towards our patients to deliver high-quality and affordable medicines. We strive for excellence and always seek for innovative solutions in our development to increase the quality and safety of our products. Our development team works in close collaboration with reputable scientists and academics on research activities which helps to move our industry forwards.

3.3 Social Media

At Zentiva, we are responsible in everything we do, every day. Social media has become a major channel of communication and interaction and we all understand its strong impact.

Our employees are our ambassadors, thus they are the face of our Company. Social media training is a part of our onboarding program and includes the information on who and how we interact on these channels.

Each employee is personally responsible for their own words, they speak as an individual and not on behalf of our Company unless they are a designated employee authorised to do so, and even when they are, we follow official positions internally agreed and never disclose confidential information. We know that any communicated information may be used to challenge our Company's interests, especially when words are not chosen carefully.

When disclosing our (employment) relationship to Zentiva online, we make clear that our statements, ideas, and/or opinions are personal and they do not represent the position of our Company.

We keep in mind that any post on social media may be globally accessible for an unlimited period of time and the confidentiality, as well as integrity of any information communicated, is not ensured. Moreover, when sharing a content which is intended for healthcare professionals only, we always make sure that all relevant internal rules and applicable legal requirements are met.





Our **BUSINESS**

At Zentiva, we operate in a fair and transparent way. Our business is based on trust and we ensure that we compete in an ethical and correct manner. We have zero tolerance to corruption and bribery and we expect the same approach in return. We conduct due diligence and perform a risk-based reputational screening on third parties prior to their engagement and strictly follow our internal rules and industry standards.

When selecting goods and services, we carefully choose our suppliers. At Zentiva, we require the suppliers to follow our Supplier Code of Conduct which summarizes key requirements on health, safety, business ethics, environment and labour.

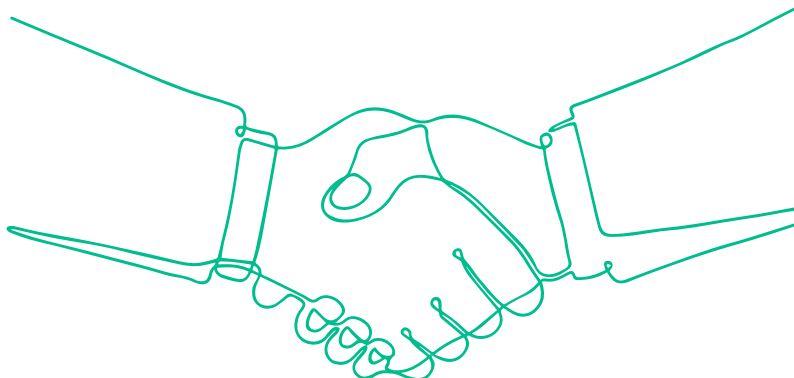
For more information, please refer to the Supplier Code of Conduct.

4.1 Cooperation with Healthcare Professionals

Zentiva works with a wide range of healthcare professionals every day. Our sales teams talk to physicians, pharmacists, wholesalers, distributors and hospital procurement teams to propose Zentiva medicines based on approved clinical rationale and or commercial terms (where the discussion is commercial in nature).

We publish information concerning activities undertaken by healthcare professionals on Zentiva's behalf. We do not offer or solicit any improper payments or other transfers of value.

Activities related to congresses, continual medical education, educational materials, sampling, educational meetings, promotional items and medical utility items are strictly controlled in line with Company policy and legal / industry standards.



4.2 Interaction with Third Parties

Every time we cooperate with third parties we strictly follow all legal and internal regulations.

We always make sure that we cooperate with reliable partners which meet our requirements regarding ethical behaviour. We expect our suppliers to follow our Supplier Code of Conduct and we conduct an assessment to make sure that the suppliers follow our requirements related to environment, governance and social dimensions of the business.

When sponsoring or conducting an event we follow our internal rules and always make sure that the requirements for such activities are met.

Representing Zentiva's business and business interests to politicians is undertaken in a transparent way based on clear argument and relevant data. All activities undertaken require the approval of the Zentiva CEO and at no point include any political donation or sponsorship.

Our employees are required to follow Corporate Policy on Interaction with Healthcare Community, Government officials and Selected Third Parties, Corporate Policy on Zentiva and Third party events and Corporate Guideline on Due Diligence process.

4.3 Fighting Bribery and Corruption

At Zentiva, we are free from any form of bribery or corruption, regardless of possible local practice or custom. We are fully committed to fight against all forms of corruption (including indirect and passive).

We carefully oversee the work of third parties

we would like to cooperate with to ensure they do not engage in activity that is or could be perceived as bribery or corruption. We also apply these rules when dealing with public procurement.

For more information, please refer to our Corporate Policy on Antibribery rules.

4.4 Conflict of Interest

Zentiva requires all employees to identify formally any potential or actual conflicts of interest and declare any gift received from any third party. Any hospitality received must be modest and consistent with industry standards.

Conflicts of interest are documented, reviewed and mitigated by the Zentiva HR and Compliance teams to ensure that they cannot impact on an individual or teams ability to represent Zentiva's interest fully.

The Zentiva team refrains from any political activism and ensures that we escalate to higher management any decisions that could be compromised by other interests or where our objectivity may be challenged.

Our employees are required to follow Corporate Policy on Conflict of Interest.

4.5 Anti-Money Laundering

We are committed to fully comply with all applicable anti-money laundering and anti-terrorism laws. We conduct our business with reputable partners using funds derived from legitimate sources and legal business activities. We refrain from any suspicious transaction and will report any signs of money laundering to appropriate authorities.

4.6 Anti-Trust and Competition Legislation

At Zentiva, we do not tolerate any behaviour that prevents, restricts or distorts free and fair competition. We always work fairly and responsibly with third parties and we expect the same approach in return. We do not hesitate to withdraw from any discussion with a third party that may breach these rules.

When we are in contact with a third party we comply with all applicable competition laws. For this purpose we have developed a competition compliance program to ensure that every Zentiva employee understands and adheres to the relevant principles and regulations.

Our employees are required to follow Corporate Policy on Competition Compliance.

4.7 Trade Compliance

At Zentiva, we comply with all applicable export, import and trade compliance laws, including embargoes, sanctions, customs and anti-boycott laws. We have an effective trade compliance program in place that also covers denied parties lists screening.

Our employees are required to follow Corporate Policy on Sanctions.

4.8 Marketing and Sales Practices

When marketing our medicines we always follow good scientific and promotional practices. All information we provide (whether printed, electronic or verbal) is accurate, objective, balanced, substantiated, scientifically up-to-date, reliable and compliant with current scientific data and applicable laws. The

information provided is accessible in the local language in a readable form that is understandable for its recipients.

All of our promotional materials comply with the relevant laws and marketing authorisation(s) or reference document(s) in force in the country where the promotion takes place.

When promotion of medicinal products is focused on the public, specific additional requirements are met. The relevant promotion shall always declare it is a promotion of a medicinal product and shall enable the recipient to form his/her own opinion.

When interacting with our customers and/or healthcare professionals, we always ensure that our promotional activities are performed in an ethical way. We do not engage in dishonest, misleading or deceptive conduct. No aggressive sales techniques are accepted.

For more information, please refer to the Marketing and Sales Practices Code.

4.9 Data Privacy

At Zentiva, we are transparent about how we process personal data. In the area of the data privacy, we act in compliance with applicable legislation and follow local specifics and legal requirements.

We only process personal data for a specific, legitimate and necessary purpose, not longer than required. We exercise adequate standards of securing the personal data when processing them and we expect the same approach from our partners, no matter if seated in or outside the European Union or the European Economic Area.

Our employees are required to follow Corporate Policy on Personal Data Processing.



4.10 Confidentiality and Cybersecurity

Zentiva operates in a highly competitive commercial environment and it is the responsibility of every employee to protect the know-how, trade secrets and intellectual property of the Company.

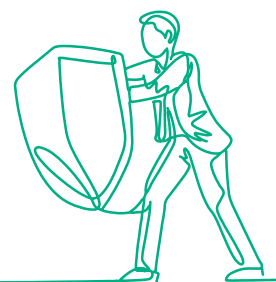
In some instances Zentiva employees will be required to retain information related to a particular topic in the event of a legal dispute or external investigation. The need to preserve materials, documents, files, records, emails will be directed by the Zentiva legal function as appropriate.

Cybersecurity is a key component of maintaining the integrity of our operations, information flows, systems, processes and intellectual property. All employees must comply with our IT and data security rules. The threat from cyber-crime is huge and we are only as strong as the weakest link. Any breach of IT / data security rules can put the Company at risk and lead to disciplinary action and dismissal.

4.11 Internal Control, Accurate Reporting and Record Keeping

At Zentiva, we report in a transparent and accurate manner in order to provide our stakeholders with a true view of our performance. We are responsible and accountable for maintaining accurate books and records.

When reporting financial information we use generally accepted accounting practices and internationally recognized accounting standards. We have a system of internal controls over financial reporting which is adequate to facilitate and ensure timely preparation of accurate financial statements that are free from material misstatements whether due to fraud or error. Our activities are subject to independent financial audit every year.





Reporting of **CONCERNS**

Zentiva encourages reporting of any concern related to our compliance with applicable laws, our Code of Ethics, internal rules and ethical principles, as well as raising of questions pertaining to compliance.

At Zentiva, we firmly believe that a well-qualified response to such reports is vital to ensure an appropriate reaction and prevention of any non-compliant activities. This belief drove the introduction of the Zentiva Speak Up initiative.

The European Union's Directive on the protection of persons who report breaches of Union law, known as the 'Whistleblower Protection Directive', provides whistleblowers with slightly different protection. As a result, we implemented it separately from the Zentiva Speak Up initiative to respect the laws implementing the Whistleblower Protection Directive in the countries where Zentiva operates.

Both the Zentiva Speak Up initiative and Whistleblowers Protection (where applicable) are governed by detailed internal rules in each Zentiva company.

5.1 Whistleblowers Protection

The rules for whistleblower protection are strictly governed by the Whistleblower Protection Directive. Each Zentiva Affiliate falling within the scope of the Directive operates internal reporting channels and shares relevant information on its website.

We strongly encourage all individuals who may benefit from whistleblower protection and want to utilize these channels to do so. Rest assured, no retaliatory actions will be taken against anyone reporting such activities in good faith.

Please read more at www.zentiva.com/whistleblowing



Speak Up!

5.2 Speak Up Initiative

Anyone who cannot or chooses not to use whistleblower protection may report any actual or suspected misconduct or compliance-related questions through our Speak Up initiative. Speaking up is the foundation for building trust both internally and externally. We listen carefully to all concerns and address them promptly, objectively and discreetly. Please be assured that there will be no retaliation against anyone reporting such activities in good faith.

We all share responsibility for compliance, and some of the most impactful conversations occur within the operational setting, where your input may align with the concerns of others. Additionally, many individuals may find it more comfortable to contact the Compliance

Department through the relevant Compliance Officer or via the Zentiva Speak-Up Line.

Please read more at <https://www.zentiva.com/speak-up-line>

Zentiva employees may also reach out to their immediate manager, another manager at a higher level, the local Human Resources Manager or a member of the Zentiva Executive Committee.

Our employees are required to follow Corporate Policy on Reporting of Concerns.

COMPLIANCE CONTACTS:

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VERSION 5, 2023

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