



Code of Conduct





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Our roadmap for ethical behaviour in business

This Code of Conduct (“Code”) explains the position of Acino International AG (“Acino”) on key integrity and compliance issues, aligned with Acino’s values:

- ◆ Trust
- ◆ Commitment
- ◆ Courage
- ◆ Empathy

The Code sets forth the ethical principles and standards of behaviour expected of all employees, managers, and directors of the Acino Group, as well as business partners and third-party intermediaries acting on behalf of Acino, including distributors and their employees when marketing or commercialising Acino products. Managers have a special responsibility to foster a work environment where ethical behaviour is encouraged and rewarded. Every instruction given or goal set in Acino is performed in the context of this Code.

As a commitment to comply with the law and be true to our values, we have established an Integrity & Compliance Department, which implements a broader corporate compliance programme. The requisite directives and operational instructions are provided to each employee, manager, and director, as well as the required training as applicable to each role and function.

We encourage employees, managers, and directors, as well as external stakeholders, to come forward and speak up when witnessing any form of misconduct. We do not retaliate against anyone who comes forth in good faith and reports any wrongdoing.

It is our firm belief that compliance is essential to the continued success of Acino and to build and sustain trust. Thank you for taking your time to familiarize yourselves with our compliance policies and for actively participating in compliance training sessions.



Andrew Bird
On Behalf of Group Management



Fahad Al Qassim
On Behalf of the Board of Directors



This Code applies to you

This Code applies to all directors, officers, and employees of Acino and its direct or indirect subsidiaries ("Acino Group"), as well as employees of joint ventures whose corporate management is provided by the Group. It is each such person's personal responsibility to understand and comply with the Code. Agents, consultants, contract labour or other third parties, when handling matters, representing, or conducting business on Acino's behalf, are expected to abide by the standards of this Code.

Managers should ensure that their team members fully understand and comply with these standards. Questions, problems encountered in enforcement as well as suggestions for improvement should be escalated to your manager or to the Head of Integrity and Compliance.

We expect third parties with whom we work to comply with all the principles in this Code of Conduct and to have an effective management system in place to ensure such compliance.



How we do business

We comply with laws of all countries we operate in

We are aware of and comply with all applicable laws, rules, and regulations of the countries in which we carry out activities. In the event of cross-border activity, we follow the strictest of all applicable standards.

We do not tolerate bribery, fraud, or corruption

Bribery in any form is strictly prohibited and never tolerated. We never provide or promise any person, whether a health care professional, public official, or private individual, directly or indirectly, any bribe, kickback or other benefit (including money, goods, grants, donations, political contributions, hospitality, travel, accommodation, congress sponsorships, gifts or any other item carrying any value) with the objective of entering into, securing, retaining, receiving or influencing inappropriate advantages. Likewise, we do not accept any benefit which could potentially jeopardize or unduly influence any of our decisions. We only give or receive gifts, entertainment, and hospitality when the gifting is an appropriate business practice, fully transparent and without any corrupt intent or purpose.

We have a zero tolerance for fraud and corruption. We investigate suspected incidents of fraudulent or corrupt use of funds or resources by employees or third party business partners.

We adhere to the highest of ethical standards as well as all legal requirements when interacting with government officials, including public officers or employees of a government or any of its departments, agencies, or enterprises.

See the Acino Anti-Bribery and Anti-Corruption Policy for more information.

We comply with standards of good practices

We comply with all applicable laws and regulations in relation to our activities such as research & development, manufacture, distribution, storage, marketing, market access, educational and promotional activities, and the reporting of safety information. Safeguarding a high level of product quality, product safety and regulatory compliance is the fundamental objective of Acino.

We monitor and implement standards of good practice applicable to the pharmaceutical industry (GxPs), including standards of Good —

- ◆ Laboratory Practices,
- ◆ Clinical Practices,
- ◆ Pharmacovigilance Practices,
- ◆ Manufacturing Practices,
- ◆ Storage Practices,
- ◆ Distribution Practices,
- ◆ Documentation Practices, and
- ◆ Promotional Practices.

See the relevant Acino GxP policies/AQDs/SOPs for more information.

We compete fairly

We act in accordance with all applicable competition laws. In particular, we refrain from having any discourse on, or making any arrangements with, competitors or other parties which restrict competition, such as the exchange of competitively sensitive information (e. g., production or sales prices, allocation of customers, markets, capacity) or bid rigging.

We refrain from the use of unfair, deceptive, or dishonest business practices. We do not impose any unlawful/abusive anti-competitive terms or conditions upon any of our distributors, licensees, or other business partners.

We compete based on the strength of our products and our employees. We market and sell our products in compliance with all applicable rules and regulations, and in line with high ethical standards.

This commitment also applies to all our other activities relating to the commercialization of our products.

See the Acino Competition Policy for more information.



We keep our books, records, and public disclosures complete and correct

We accurately record all legally required information. This includes expenses, revenues, research and/or clinical test results, production and quality data and any other legally required information. All financial transactions and payments must be authorized as per the existing delegation of authority charter and subsequently correctly recorded. We comply with our tax obligations and all other public reporting requirements.

We comply with all laws regarding insider trading, anti-money laundering and international trade

We do not buy or sell shares of publicly-traded companies, in breach of a duty or other relationship of trust, or on the basis of material, nonpublic information about the company. Nor do we share such information with any other individual, regardless of whether such other individual will actually buy or sell shares after receiving such information.

We observe all applicable anti-money laundering laws. We are committed to conducting business with reputable partners using funds from legitimate sources. We take action in case of any indication that a partner is involved in criminal activity, terrorist financing or use of funds with illegal origins.

We comply with all trade sanctions and export control laws as they apply in the regions in which we conduct business. We hold our business partners to these same standards.

See the Acino Trade Sanctions and Export Control Policy for more information.

We work with ethical business partners

We establish business relationships with third parties (such as suppliers, consultants, customers, etc.) to support Acino in managing its activities efficiently and effectively. We are committed to working with third parties that adhere to ethical business practices, including anti-bribery and anti-corruption, corporate social responsibility, labor, health, safety, environmental protection, and management systems.

We select our third party business partners on the basis of fair and transparent due diligence and procurement processes. Acino also supports and respects international guidelines concerning responsible sourcing of raw materials, including any requirements concerning conflict minerals.

See the Acino Third Party Intermediary Due Diligence Manual for more information.





How we treat others and the environment

We protect the environment as well as the health and safety of our colleagues and others

We are committed to adhering to applicable laws and regulations related to the environment, occupational hygiene & safety by

- ◆ complying with all applicable health, safety and environmental policies and procedures;
- ◆ using personal protective equipment whenever required;
- ◆ not tolerating anyone working under the influence of (illegal) drugs or alcohol;
- ◆ always evaluating potential environmental impact in your projects;
- ◆ reducing the use of resources wherever feasible; and
- ◆ immediately reporting any incidents or accidents and supporting related investigations.

See the Acino EHS/CSR Due Diligence SOPs for more information.

We treat our colleagues and others fairly

We believe in highly talented people with diverse backgrounds and inclusive mindsets. Within the Acino Group, we treat each other with respect and with zero tolerance against any form of bullying or harassment. We do not tolerate any kind of discrimination, regardless whether based on gender, nationality, race, colour of skin, religion, creed, age, ethnic background, civil status, pregnancy, disability, genetic information, gender identity, sexual orientation, disabilities, membership in trade unions, political affiliation, or violation of any other protected status.

We do not compromise on requirements set out in national law or international standards with regard to human rights. We do not use child or forced labour or other forms of involuntary labour. We refuse to work with suppliers that are found to use such forms of labour.

We respect the property rights of third parties. We do not tolerate the misappropriation or infringement of third party intellectual property rights or confidential information.

We provide our employees with fair and competitive wages based on performance and according to applicable labour laws, including minimum wages, working hours and benefits.

We respect freedom of opinion, speech, and association

We are free to express our personal political views and to engage in political activities outside of working hours and using our own personal (not company) communication channels (e. g., email), without fear of retaliation or discrimination in the workplace. We do not, however, use the Company's name or information to further our personal political interests. We are free to join labour associations and political parties of our own choosing and to be part of, or included in, collective bargaining.

We are free to express our opinion and are entitled to freedom of expression and speech, provided there is no interference with our ability to fulfill our responsibilities under the employment agreement or conflict with this Code.

See the Acino Social Media Guidelines for more information.



How we protect our assets

We protect Company property, including confidential information and intellectual property

We handle company property with care, whether tangible or intangible, and return the same upon termination of our affiliation with Acino.

We protect confidential information of the Acino Group. We only share confidential information when having the appropriate authorization to do so, the appropriate protections in place (e. g., a confidentiality agreement) and solely on a “need to know” basis. We follow all laws and regulations regarding the protection and processing of data. Company confidential information includes any type of information that Acino chooses not to make public, including business secrets, business plans, databases, intellectual property, information regarding mergers and acquisitions, proprietary data, process details, personal data, financial information, management changes, technical specifications, pricing proposals or other business information.

We protect our intellectual property (“IP”), including the creations, inventions and technology that give us a strategic advantage. IP includes our copyrights, know-how, patents, trademarks, and trade secrets.

We do not make copies of reports or documents for our own personal use, nor do we archive them for such purposes. We retain or discard records only in accordance with any internal record retention policies. We do not dispose of any records that are subject to a legal hold notice, even if they are being held beyond required retention periods.

We observe all data protection and privacy rules

We respect the data protection rights of our employees, patients, health care professionals and other data subjects. We process personal data only in accordance with applicable data protection laws and safeguard the personal data within Acino’s premises and systems against accidental loss, destruction, unauthorized access, use, modification, and disclosure.

We disclose or transfer personal data to third parties only when legitimate grounds to do so have been established and appropriate measures have been taken to ensure the adequate protection of that personal data, in compliance with applicable laws.

In the event of mismanagement, data breach or any incidents with files, printed or electronic, or systems which contain personal data, we immediately report to the Group Data Protection Officer.

See the Acino Data Protection Policy and other privacy policies for more information.



We avoid conflicts of interest

We do not pursue personal interests, in our own favour or in favour of our family members, friends and partners, which are contrary to those of the Acino Group. In case of a risk of our personal interests or outside activities influencing our business judgment or decision-making on behalf of Acino, we disclose the conflict of interest and cooperate to ensure its proper management.

See the Acino Conflict of Interest Policy for more information.

We use communication devices properly

We use Company IT resources (computers, mobile devices, email, storage media, approved software, internet access, etc.) for business purposes in serving the interests of Acino. We exercise good judgment regarding the reasonableness of private use of Company IT resources and take care never to expose Acino to a security risk. We do not produce, access, or view discriminatory, offensive, pornographic or other prohibited or inappropriate content.

We understand that all data created on Company systems are the property of Acino. We understand that Acino may monitor and investigate use of Company IT resources, as permitted under applicable employment and data privacy laws. We report any suspected breach, theft, loss or vulnerability immediately.

See the Acceptable Use Policy and other IT policies for more information.

We communicate externally and use social media in a responsible manner

We ensure that all publications about the Company are approved by Acino's Corporate Communications Department. This includes the publication of information or the release of statements on behalf of Acino or any entity in the Acino Group. We forward all media inquiries to Corporate Communications as they are the official company spokespersons.

When communicating with external stakeholders, we take care to protect the reputation of Acino. In all our interactions, we are transparent about our affiliation with Acino and mindful of all Group Policies and Procedures, including this Code of Conduct.

When speaking publicly, we make clear whether we are presenting on our own behalf (e. g., by incorporating a disclaimer that the views expressed are our own and not necessarily those of Acino), or on behalf of Acino. We ensure that all public presentations on behalf of Acino are reviewed and approved internally by the respective subject matter experts, line managers and Corporate Communications.

We do not post deceptive, inaccurate, misleading, confidential, or defamatory statements on social media, nor do we comment on Acino products or competitors.

We report any knowledge of persons not directly employed by any Acino legal entity utilizing the Acino trademark or company name on any social media. This includes employees of vendors, suppliers, distributors and any other third parties acting on behalf of Acino.

See the Acino Social Media Guidelines for more information.





How we work together

We encourage feedback and a speak-up culture

We are committed to an environment with open and honest communication, built on trust and collaboration. We encourage our employees to approach supervisors or management in instances where they have questions, suggestions, or concerns.

If we have knowledge or a good faith suspicion that a violation of an Acino policy or the law has occurred, we raise a report. We all have a personal responsibility to report suspected wrongdoing. We never retaliate against a person for speaking up in good faith, even if the report proves to be unfounded. On the other hand, we never misuse reporting lines in bad faith against fellow colleagues, with unfounded or defamatory claims.

To report an incident, ask questions, or make recommendations, we may contact any of the following:

- ◆ Our manager or supervisor;
- ◆ Our Human Resources business partner; Another managerial employee at our location; Any Compliance personnel;
- ◆ Any Legal, Integrity and Compliance Department personnel; or
- ◆ The Speak-Up Line (<https://acino.ethix360ae.com/>).

We do not tolerate breaches of this Code. Alleged violations will be appropriately investigated. If confirmed, a violation may result in corrective and/or disciplinary measures or legal actions up to and including termination of employment or contract with the Acino Group.

See the Acino Speak-Up Policy for more information.

Effective Date

This Code of Conduct is effective as of 12 September 2023. It is applicable to all operations and all employees, managers, and directors of the Acino Group. It replaces all former Codes of Conduct of all Acino Group entities.



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