Acting with **Integrity**

Mundipharma's Code of Conduct



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Integrity at the Heart of All We Do

An Introduction from Marc Princen, CEO

Acting with integrity is a critical part of our commitment to our mission of United for Patients. After over 40 years in the pharmaceutical industry, I remain passionate about providing patients across the world access to medicines and support.

Every day, we make decisions that could impact the lives of thousands of people. We are provided with the opportunity to make a difference, and sometimes this means making difficult choices and having the courage to speak up.

Our Mundipharma Code of Conduct helps us navigate difficult or complex situations and gives us confidence that we will meet the high ethical and legal standards expected of us. The Code applies to everyone – irrespective of level, geography or role – and we are all responsible for ensuring we don't just understand it but challenge ourselves and each other to live it daily.

The world we are living in moves fast, can be volatile and is at times complex. Our Code of Conduct should keep us grounded and guides us in our United for Patients mission. Let us continue to keep our standards high and keep working and growing together in this mission for patients and their families – who need us when it matters most.

Thank you,
Marc



If something doesn't feel right, please use our **Speak Up** channel to raise your concern.

Who does the Code of Conduct (the "Code") apply to?

The Code applies to all of us: every employee, officer, contractor, and temporary worker across the global Mundipharma network and associated companies.

We expect our business partners to meet similar ethical and legal standards.

Your **Responsibilities**

Employees must conduct day-to-day work with honesty and integrity, as well as the specific rules contained in the Code, company policies, procedures and trainings. **Our Mundipharma Values – Unique, Nimble, and Impactful**– guide ethical, thoughtful decisions that improve patient lives and health outcomes.

Do not assume that a situation is permitted simply because it is not explicitly prohibited by the Code or company policies. If you have any doubt, seek guidance from your manager, Compliance, Legal, or the HR team. Each of us shares responsibility for living our Code and holding each other accountable.

The Role of **Managers**

Managers have an important responsibility to set the tone by exemplifying ethical behaviour and living our Code.

- **Lead by Example** through good decisions that reinforce integrity.
- **Foster an Inclusive, Open-Door Culture**, where speaking up is encouraged and safe.
- **Ensure Employees Understand the Code** and company policies and have the resources to follow our Values.
- **Act Promptly and Fairly** on any Code violations.

Consequences of **Code Violations**

Not following our Code may harm our company, employees, patients, business partners. It is a condition of your employment or assignment with Mundipharma that you comply with the Code. Breaches may result in disciplinary actions, up to and including termination, as permitted by local laws.

Industry Codes

As a pharmaceutical company, we are committed to complying with all relevant industry codes and standards, including, but not limited to Association of the British Pharmaceutical Industry (ABPI), European Federation of Pharmaceutical Industries and Associations (EFPIA), International Federation of Pharmaceutical Manufacturers and Associations (IFPMA), Innovative Medicines Canada (IMC), amongst other applicable local codes. These codes govern how we interact with healthcare professionals, patients, and other stakeholders, and they form an essential part of our commitment to integrity, transparency, and responsible conduct.

Important note: This Code of Conduct does not replace applicable laws, regulations, or industry codes. If a local law, regulation, or industry code sets a higher standard than this Code, that higher standard must always be followed. When in doubt about which requirement applies, employees must seek guidance from Compliance or Legal before taking action.

Mundipharma **Guiding Principles** and **Behaviours**

Our Mundipharma House guides our commitment to excellence.

Our Shared Mission

United for Patients means putting patients at the heart of what we do. Our work impacts lives. Patients trust us, and we honour that trust by doing the right thing and speaking up when safety, quality or integrity are at risk. We strive to improve access to care and enhance health outcomes for all.

Our Values

Unique, Nimble and Impactful help guide our actions and our behaviours towards each other and all our external stakeholders including, and most importantly, healthcare providers and their patients. These values shape our culture and define who we are as Mundipharma.

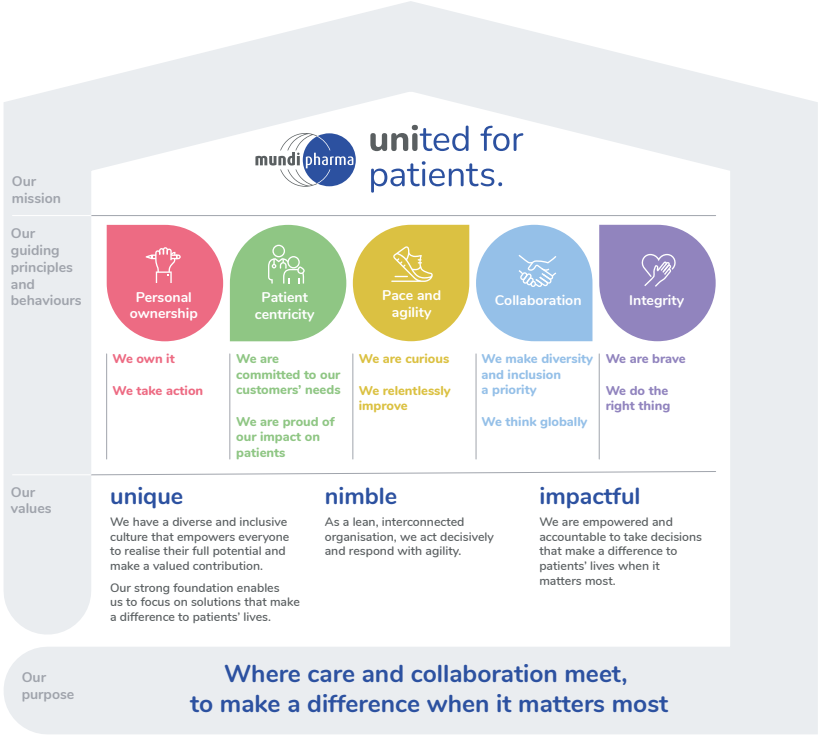
Our Purpose

Where care and collaboration meet, to make a difference when it matters most – is crucial. It unites us and provides clarity on why we do what we do. When we communicate responsibly and execute with quality and integrity every day, we maximise our patient reach and impact.

Our commitment to integrity is absolute because trust is everyone's responsibility. **In all we do we should always remember that patients' safety and lives are at stake.**

Together, we can drive meaningful changes and achieve our mission of United for Patients

The Mundipharma House



Our Guiding **Principle of Integrity**

Integrity is at the heart of who we are.

It guides every decision, every action, every interaction.

We live our Values and ensure integrity in everything we do.

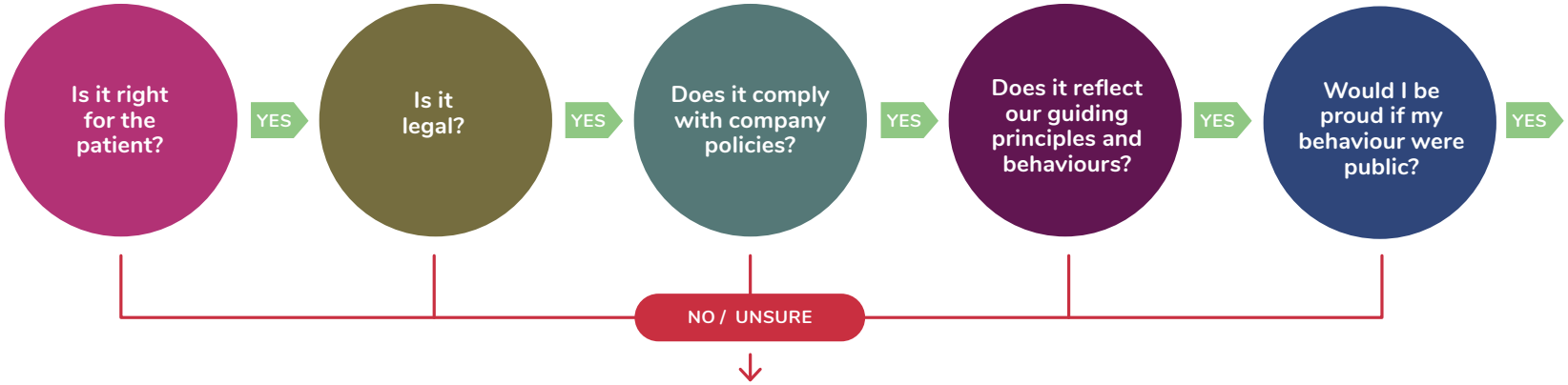
Acting with integrity means that **we are brave** and **we do the right thing** so that we are **proud of our collective** and individual conduct.

This includes:

- Having the **courage to speak up** if something doesn't feel right, even when no one else does.
- Not blindly accepting **the way things have been**.
- **Respectfully engaging with one another**, irrespective of race, colour, gender, sexual orientation, religion, role or other individual characteristics. We believe every person deserves to be seen, heard and cared for.
- **Being empowered** to suggest alternatives and constructively challenge each other to improve.
- **Being honest** in our words, behaviours and our dealings.
- **Making the right decisions**, even when they are the tough decisions.

Making **Integrity-Based Decisions**

Identifying risk areas and ethical dilemmas is the first step in making integrity-based business decisions. The second step is to **pause**, **reflect** and **consider possible risks and consequences** by asking yourself:



If you answer **'No'** to any of these questions, or if you are **'Unsure'**, **seek guidance** from your manager, Compliance, Legal, or HR.

Ethical decisions promote **trust and accountability** both internally and externally.

Speaking Up

Acting with integrity is having the courage to speak up if something does not seem right or is inconsistent with the Mundipharma guiding principles and behaviours. Speaking Up protects our patients, employees, healthcare partners, society at large and our reputation – and it shows that we are living our values. The Mundipharma 'Integrity Line' process is a safe place for anyone (including employees, business partners, customers, and others) to speak up about concerns of actual or suspected misconduct and get the right support for doing the right thing.

How to **Speak Up**

To seek help or report a concern, employees are encouraged to:

- Talk to your manager
- Contact Compliance, HR or Legal
- For any concern, you can always use the 'Integrity Line' – available online or by a toll-free number, in local languages, which includes the option to remain anonymous if preferred.

Integrity Line

- Managed by an independent, external service provider.
- Confidential with anonymous reporting.
- Available anywhere in the world, 24/7.
- Provides a secure way to follow up on your reports.

What Happens When You Report a Concern?

Acknowledgement
An investigator confirms receipt, usually within three working days.

Assessment
Every report is reviewed to determine next steps. If more information is needed, an investigator may reach out.

Action
The Investigations Team will ensure that a thorough, fair and impartial investigation is conducted or, depending on the facts, a thorough review of the reported concerns is carried out.

Confidentiality
Only those who need to know will be informed. Your privacy is respected throughout the process.

There is a requirement that **employees cooperate fully** to support a thorough and fair process. Be prompt, truthful, and complete in your responses, and provide any requested documents or materials. If anything is unclear, ask for clarification.

All information you share will be kept confidential, except as needed to conduct a full, fair investigation or as required by law. You may choose to remain anonymous, but please provide as much detail as possible to help us investigate effectively.

Do not record interviews or discuss the matter outside the process. Retaliation – by or against anyone involved – is **strictly prohibited** and must be reported immediately.

The **Investigation** Process

When a concern is investigated, trained professionals follow a fair and impartial process



Investigations are conducted promptly to **reduce anxiety and ensure timely resolution**.

Non-Retaliation and Confidentiality Reminder

We do not tolerate retaliation – ever.

- **You are protected**: We are committed to supporting employees who report concerns in good faith and will not tolerate any form of retaliation or victimisation.
- **Examples of retaliation**: Harassment, intimidation, bullying, discrimination, or any adverse action against someone for Speaking Up.
- **Consequences of retaliation**: Retaliation is itself a breach of our Code of Conduct and may lead to disciplinary action.
- **Your role**: If you believe you are experiencing retaliation, report it immediately to Compliance, HR , Legal, or your manager.

Resource Hub:
We're Here To Listen page on MundiConnect.

Our Code of Conduct is built on five pillars – **the 5 Pillars of Integrity**.

Together, they define how we serve patients, empower our people, govern our business, partner responsibly, and protect our planet.



Our **Patients**



Acting with Integrity – **For Patients and External Stakeholders**

Our mission - United for Patients - puts patients at the heart of everything we do.

We improve access to care and health outcomes for all those who can benefit from our important medicines, in line with applicable laws, approved labels, and internal policies. This section explains how we interact responsibly with patients, healthcare professionals and others to ensure safety, quality and trust.

Patient Interactions

Patient centricity is a guiding principle at Mundipharma. **We collaborate with Regulatory Authorities, Healthcare Professionals (HCPs), Patients, Patient Organisations, and Government Officials (GOs) to improve healthcare outcomes.**

Patients



We inform and educate patients on our products in accordance with applicable laws and regulations. We engage patient associations to understand patient perspectives and treatment needs, helping ensure that our activities meet those needs.

The Global Policy on Interactions with Patient Organisations and Patients defines the expectations for Mundipharma Representatives when interacting with these groups. **Clarity of Purpose, Independence, Transparency and Integrity** are the general principles that govern all interactions, to ensure that we collaborate in a transparent and ethical manner.

> *"All interactions must respect the physician–patient relationship and must never be used as inducement to prescribe, recommend, purchase, or switch therapies."*

Guidance on Patients Interactions

- Relationship with Patient Organisations and/or Patients **must be led by Scientific Affairs**.
- Mundipharma Sales Representatives are **not permitted to interact directly with Patient Organisations and Patients**.
- All materials and programmes must be **evidence-based, non-promotional, and reviewed and approved by Scientific Affairs**.
- Any patient data collected must be **handled in line with the privacy laws and company policies**.

Subject to other policy requirements and when aligned with a clear and legitimate purpose, types of possible interactions include engagement with patient organisations or patients as consultants or speakers; provision of grants, donations or sponsorships; and development of Patient Support Programmes (PSPs) to help patients and their caregivers better manage disease and optimise their treatment. All such interactions require written agreements and follow our transparency and data protection requirements.

Resource Hub:
Scientific Affairs page at MundiConnect.



Government Officials Interactions

Our commitment to improving patient outcomes extends to how we engage with Government Officials, who shape healthcare systems, regulatory frameworks, and patient access. These interactions must uphold **integrity, transparency, and impartiality**.

How We Engage

Interactions with Government Officials must be:

- **Purpose driven** – focused on legitimate scientific, regulatory, or policy matters that advance patient care.
- **Transparent** – conducted openly, with clear documentation and in accordance with applicable laws, regulations, and industry codes.
- **Respectful and impartial** – free from any attempt to improperly influence decisions or create a perception of undue influence.
- **Accurate and evidence based** – grounded in balanced, factual information that supports sound public health outcomes.

Guidance on Interactions with Government Officials

To protect patient trust and maintain ethical standards, **we do not**:

- **Offer, promise, or provide anything of value** that could be perceived as influencing a Government Official's decision making.
- **Engage in political contributions, sponsorships, or activities** that could create a conflict of interest or the appearance of impropriety.
- **Provide hospitality, gifts, or benefits** to Government Officials, except where strictly permitted by law and aligned with industry codes.
- **Use third parties or intermediaries** to circumvent these requirements.

All engagements with Government Officials **must be pre approved**, appropriately documented, and aligned with internal policies and global industry standards.



> *We act with integrity in every interaction that influences patient care – whether with patients, healthcare professionals, or government officials.*

Our expectations for interactions with Government Officials are grounded in the same principles that guide our interactions with patients and patient organisations: respect, transparency, and a commitment to improving health outcomes.

These interactions must always reflect our responsibility to act in the best interests of patients and uphold public trust.



Healthcare Professional (HCP) Interactions

The independence of HCPs is of paramount importance to ensure that their clinical decisions are in the best interests of patients. **All interactions with HCPs must have a clear, legitimate purpose** and must never improperly influence prescribing, recommending, selling, purchasing, supplying or administering of Mundipharma products.

Healthcare Professionals



Healthcare professionals are registered or otherwise certified members of the medical, dental, pharmacy or nursing professions, or any other person who is authorised as part of their professional duties to prescribe, recommend, purchase, supply, or administer a product.

In Mundipharma policies, the definition of healthcare professionals also includes those who support healthcare professionals in their delivery, such as hospital administrators.

Guidance on HCP Interactions

When engaging with HCPs, employees must:

- Ensure the purpose of the interaction is **legitimate and patient focused**.
- **Use only approved**, on-label content and company approved materials (no off-label promotion).
- **Never offer payments**, gifts, or other benefits, including entertainment or hospitality, as inducement, to prescribe, recommend, or purchase our products.
- Ensure any payments (e.g., consultancy, research, speaking engagements) are **fair market value, for bona fide purposes, and properly documented**.
- **Follow all applicable laws**, industry codes, and Mundipharma policies.
- **Seek guidance** from Compliance, Legal, or HR if in doubt.

Given the complexity and evolving nature of laws and industry standards governing interactions with Patients, Patient Organisations, Government Officials, and Healthcare Professionals, employees must seek guidance from the appropriate functions – such as **Medical Affairs, Legal, Compliance, Corporate Affairs, Safety, or Quality** – when the nature of the activity requires their expertise.

Responsible Promotion to Healthcare Professional

Promotional activity may only be carried out:

- For **approved**, on-label indication.
- Using **company-approved content**.
- By **appropriately trained** and authorised internal or third party employees.
- In an **honest**, **fair** and **balanced**, and **transparent manner**.

> *Healthcare professionals must form their own science-based opinions about the therapeutic value of our products and what is best for their patients.*

Resource Hub:
Interactions with Healthcare Professionals page on MundiConnect.

Patient Safety and Product Quality

Patients rely on our products to improve health and quality of life, and we are committed to strict adherence to all applicable rules and ethical standards.

Adverse Events

Any employee who becomes aware of an adverse event, (side-effect) or other safety information relating to a Mundipharma product is **required to report it to the Drug Safety team as soon as possible** and no later than within 24 hours of becoming aware.

What to Do

Recognise – If you become aware of an adverse event, (side effect) or other safety information

Report – Notify Drug Safety team within 24 hours

Respond – Cooperate fully to ensure patient safety and regulatory compliance

Resource Hub:
Global Safety Reporting Policy on the Safety Reporting page at MundiConnect.

Quality **Defects**

An employee who becomes aware of a product quality defect must **report this to the Quality Complaints Hub by email** complaints@mundipharma-to.com as soon as possible and no later than within 24 hours of becoming aware.

What to Do

Recognise – If you become aware of a product quality issue

Report – Notify Quality Complaints Hub within 24 hours

Respond – Cooperate fully to ensure patient safety and regulatory compliance

Resource Hub:
Quality page on MundiConnect.

Access to Medicines

We are committed to helping patients gain timely and equitable access to our medicines. Integrity in access means:

- **Working with healthcare systems, regulators, and partners** to expand availability where unmet needs exist.
- **Supporting responsible pricing and reimbursement practices** that balance innovation with affordability.
- **Manufacturing, or ensuring the manufacture of**, high-quality, safe and compliant products that patients can rely on throughout their treatment journey.
- **Ensuring distribution practices are fair, transparent, and compliant** with local laws and global standards.
- **Developing patient support programmes** that help patients and caregivers manage treatment effectively.
- **Continuously reviewing barriers to access and seeking solutions** that improve health outcomes.

> *Our goal is to ensure that patients who can benefit from our medicines are able to receive them safely, responsibly, and in line with our mission United for Patients.*

Counter-Diversion and Illicit Trade

We seek to proactively prevent the diversion of Mundipharma's products, including counterfeiting, through maintaining a secure supply chain, adhering to strict Regulatory requirements such as product serialisation, and through participation in Industry and Agency-led initiatives that disrupt and enforce against all forms of diversion.

Additional security measures are taken in relation to opioid analgesics to avoid theft and loss in our supply chain, including increased product tracking where necessary.

We are committed to responsible sales and promotional activities, which includes monitoring for unusual ordering of Opioid products and taking proactive steps to reduce the risk of diversion. Employees must report suspected diversion or suspicious orders through appropriate channels. Where appropriate, we collaborate by sharing the data with Authorities to support investigations and enforcement actions.

Responsible Pain Management of our Opioid Portfolio

Mundipharma recognises the critical role of opioid medicines in pain management and Opioid Use Disorder treatment, and commits to their appropriate use. We believe that patients under the care of healthcare professionals should have access to adequate treatment options with appropriate consideration of the benefits and risks associated with opioid use.

Prescribing decisions must carefully balance patient needs with risks of side effects, potential abuse, addiction, and diversion.

We are committed to mitigating the risks of misuse, abuse, and diversion of our opioid portfolio through rigorous controls to ensure a secure supply chain, appropriate medical education for healthcare professionals, and responsible sales and marketing practices, as well as a regular review of these controls to assess effectiveness and drive continuous improvement.

Resource Hub:
Mundipharma charter on the responsible medical use of opioid analgesics in pain management and ONE Opioid Guidance on Scientific Affairs page on MundiConnect.

Research

Mundipharma is committed to conducting non-clinical and clinical trials with the highest standards of ethics, scientific rigor, and regulatory compliance.

All internal staff involved in clinical research must ensure that participant safety, informed consent, and adherence to Good Clinical Practice (GCP) guidelines, such as those outlined in International Council for Harmonisation (ICH) E6 (R2) and the upcoming ICH E6 (R3), as well as applicable local regulations, are upheld at all times.

Maintaining data integrity is essential; this includes accurate, complete, and timely recording of trial data, secure data storage, and transparent reporting without manipulation or omission. Any potential conflicts of interest must be disclosed and managed appropriately.

> *Our commitment to transparency, accountability, and respect for research participants is fundamental to the credibility and success of our clinical development efforts.*

Clinical trial product supply should be safe, compliant, of appropriate quality and in line with regulatory approval.

Our **Principles**

Acting with Integrity – **In How We Do Business**

Conflicts of Interest

We all have a responsibility to make decisions in the best interests of patients, and Mundipharma. A conflict of interest arises when an employee's personal, social, financial, or political interests could improperly influence decisions or behaviours to the disadvantage of Mundipharma, our customers or patients. Conflicts can also arise where an employee's position within Mundipharma is used for personal gain.

Conflicts may be **actual, potential, or perceived**. Even the appearance of a conflict carries the risk of causing reputational damage and legal issues for both our company and the individual employees involved.

Outside interests must never affect our objectivity, motivation, or performance. We must be attentive, **transparent, and accountable to ensure conflicts are identified, disclosed, and managed**.

Employees must:

- **Recognise** situations that may create actual, perceived or potential conflict of interest.
- **Disclose** immediately any actual, potential or perceived conflicts of interest via company-provided reporting channels at onboarding, role changes or while employed.
- **Seek approval** and work with managers to resolve conflicts before taking actions or making decisions,
- **Never accept or offer any gifts or benefits** that have the intent or effect of compromising an objective decision or action

Conflicts of Interest – **Additional Guidance**

Examples of actual, perceived or potential conflicts of interest include:

- **Personal relationships** with colleagues, subordinates, vendors, HCPs/HCOs, competitors, or government officials that could influence business decisions.
- **Financial interests** in competitors, suppliers, HCOs, or any entity seeking to do business with the company.
- **Outside employment or consulting** that overlaps with our business or involves HCPs/HCOs.
- **Use of company time, information, or resources** for personal projects or outside business activities.
- **Redirecting business opportunities** to yourself, family members, or personal contacts (self-dealing).
- **Board memberships or advisory roles** with competitors, HCOs, suppliers, or industry groups that create divided loyalty.
- **Government or regulatory relationships** that could influence—or appear to influence—company decisions.
- **Gifts, hospitality, or favours** from vendors, HCPs, or partners that could create perceived bias.

> *Failure to disclose conflicts violates this Code and the Conflict of Interest Policy and may result in disciplinary action.*

Decision Aid: Is it a Conflict?

Ask yourself

Is it inconsistent with our Code, policies, or law?

Would it conflict with our values, Mundipharma guiding principles and united for patients mission?

Could it appear unethical to stakeholders?

Could it harm my reputation or Mundipharma's?

If "yes" to any, disclose, seek guidance, and remove yourself until resolved.

Resource Hub:
Global Policy on Conflicts of Interest and Conflict of Interests – Disclosures and Mitigation Process page on MundiConnect.

Gifts and Entertainment

While gift-giving and entertainment may be customary in many cultures, Mundipharma employees, contractors and representatives must follow company rules.

Before offering or accepting any gift or entertainment, ensure it does not influence a business decision, create reputational risk, or breach Mundipharma or business partner policies.

Gifts and entertainment must never be used to influence decisions or create reputational risk. They should build goodwill, not provide personal benefit.

Resource Hub:
Global Interactions with HCPs (IHCP) Policy, Anti-Bribery & Corruption (ABAC) Policy and Conflict of Interest – Disclosure and Mitigation Process on the Compliance page at MundiConnect.

You must comply with the following requirements:

Gifts and entertainment must never be cash or cash equivalents.

Entertainment, such as meals or social events with a business partner, may be acceptable if modest, infrequent, and aligned with good business practice.

Gifts or entertainment to **government officials are prohibited.**

Procurement personnel and decision-makers may not give or receive gifts or entertainment.

All gift/entertainment offered, given or received **must be a responsible use of company resources**, approved by your manager, accurately recorded and properly documented.

Country-specific rules apply to interactions with healthcare professionals. Additional disclosure requirements may apply.

If you receive a non-compliant gift/ entertainment, return it where possible. If returning is impractical or offensive, provide it to HR for use in employee recognition or donate it per company process and inform the business partner of our restrictions.

If the giving or receipt of a gift or entertainment could cause a Conflict of Interest, employees must log this in the respective system as per the Conflict-of-Interest Disclosure and Mitigation Process.

Preventing Bribery and Corruption

Bribery

Bribery is any offer, promise, giving or receiving of a financial or other advantage to improperly influence performance of duty. Bribes can include any form of benefit, such as cash payments, bank transfers, gifts, donations, meals, travel, unnecessary or excessive consulting fees, discounts, personal favours, or preferential contract terms.

Corruption

Corruption is the abuse of entrusted power for private benefit that usually breaches laws, regulations, standards of integrity and/or standards of professional behaviour.

The giving or receiving of any bribe or improper advantage is prohibited. This includes anything given directly to an intended recipient or indirectly, such as through a family member, to a government official, favoured charity, or business interest of the intended recipient. Business pressure, potential loss of sales, manager direction or approval do not justify or excuse bribery. The company does not tolerate engagement in any form of bribery, corruption or money laundering.

Resource Hub:
Anti-Bribery & Corruption (ABAC) Policy, Third Party Risk Management Process on the Compliance page at MundiConnect.

Facilitation Payments

A facilitation payment, sometimes referred to as a "grease payment", is a payment of cash or other item of value that is provided to a government official to speed up or obtain the performance of a routine, non-discretionary duty. Facilitation payments are PROHIBITED, and no Mundipharma representative is authorised to make any form of facilitation payments.

In contrast, it is permissible for the company to make legally required payments (such as a filing fee) as part of an official government process (such as an application for regulatory approval of a product), **provided it is made in a transparent and documented manner** to an official government office rather than to an individual.

Employees must:

- **Not offer, give, or receive a payment, gifts or benefit** that is intended to, or could be perceived to, improperly influence another, or gain a favourable outcome or business advantage, as these are all considered forms of bribery.
- **Not make facilitation payments**, either directly or through a third party.
- **Keep accurate records of all transactions**, including the business purpose and approvals obtained; and
- **Be vigilant** and immediately notify the company of any observed or suspected violations by reporting the matter to their line manager, Legal, Compliance, or the Integrity Line.

Grants and Donations

Mundipharma is proud to provide grants and donations in the form of financial support or company products for activities that foster our guiding principle of **patient centricity** to deliver better, faster, and more impactful solutions, to advance medicine, healthcare, and education, and to benefit the communities in which we operate.

No Political Donations

Company funds or resources may not be used to support a political party or candidate, or for other political purposes. This includes direct contributions as well as indirect assistance or support, such as buying tickets to political fundraising events, providing goods, services or equipment for political fundraising or other campaign purposes., or volunteer work by Mundipharma representatives within normal business hours or with company resources.

> *"At Mundipharma, all grant and donation decisions are made by a centralised committee to ensure fair and appropriate use of funds and to maintain independence from commercial considerations."*

Resource Hub:
Grants and Donations Process on the Compliance page at MundiConnect.

Legal, Financial and Transactional Integrity

Financial **Integrity**

Internal and external stakeholders rely on us to report financial information accurately, completely and in a timely manner. **Employees must ensure that data is accurately recorded without alteration** and that no business records are falsified, misstated, or misleading through the omission of material facts.

Any act of theft or fraud will not be tolerated. Employees must follow all applicable Finance and Procurement policies.

Anti-Money Laundering (AML)

Money laundering is the process by which individuals or organisations conceal the origins of proceeds from illegal or criminal activities, by moving them through financial transactions or structures designed to make those proceeds appear legitimate.

Employees must:

- Pay only legitimate entities to their verified accounts.
- Payments to unusual locations require Corporate Finance approval.
- If you are aware of or concerned about any potential or actual payments that may breach AML laws you must report to your manager, Compliance, Legal, HR or the Integrity line.

Fair competition and Anti-Trust Laws

The purpose of competition and antitrust laws is to protect consumers and promote fair and free competition in the best interests of the public. We are committed to competing lawfully and pro-competitively based on lawful price setting as well as the high quality and efficacy of our products and our service delivery.

Employees are required to uphold this commitment and must not engage in any anti-competitive practices including resale price maintenance, predatory pricing, price fixing, market rigging, improper information sharing or collusion or any other behaviour that violates applicable laws.

> *"When bidding in tenders, we must strictly follow the procedures set out by the tendering entity and uphold ethical and legal standards."*

This principle must be observed in daily practice when we communicate internally on competitor-related topics, how we set strategies and objectives for the business, and how we engage with external parties.

When bidding in tenders, contracts, or any other formal / informal healthcare procurement structure, employees must strictly follow the procedures set out by the procuring entity and must uphold ethical, legal and competition law standards when gathering or disclosing commercially sensitive information and ensure tender applications are compliant with market regulatory requirements. All communications referring to our business and our competitors should be appropriate in tone and refrain from language that could be construed as encouraging anti-competitive behaviour or disparaging third parties.

Competition laws are complex and vary by country. For guidance or in case of any doubt, you should consult Legal.



Legal, Financial and Transactional Integrity

Sanctions, **Embargoes**, and Trade Controls

Sanctions, embargoes, and trade control laws are part of diplomatic efforts by countries or regional organisations such as the United Nations against states, organisations, or individuals to protect national security interests, international law, and defend against threats to international peace and security. **Such laws may govern the import, export, or transfer of certain products and information** to specified countries, governments, government officials, entities, and individuals.

Employees are responsible for ensuring a proper understanding of any restrictions applicable to activities carried out for Mundipharma, ensuring any required sanctions screening of third parties and associated individuals, and reporting any known or suspected change in ownership of our business partners that could implicate sanctions laws.

> *We are each responsible for ensuring a proper understanding of any and all restrictions which apply to what we do.*

Insider Trading and Securities Laws

Because of the work we do, **our organisation and employees may hold information that is confidential, non-public and valuable**. If it was disclosed to the public, it could affect the market prices of shares and other financial instruments. We are all, like any other company or person, subject to prohibitions on using such information.

Employees in possession of insider information that has not become public **must maintain such information as confidential** and may not buy or sell the securities of any company that the information relates to.

The prohibition on disclosure and trading in such securities includes buying and selling indirectly through others including family, friends, or professional advisors. **Employees may not disclose the information to other employees except as strictly and legitimately required** to conduct company business. Employees that become aware of any potential breach of this policy must report the circumstances to Legal, Compliance, or via the Integrity Line.

Insider Information

Insider information is information which relates to securities (shares of a company); is specific or precise; has not been made public; and if it were made public would be likely to have a significant effect on the price of any securities.

Information Integrity

Confidential Information

In the course of employment, many employees will come across confidential information. Such confidential information may belong to third parties (shared under an agreement) or to our company but in either case employees are under an obligation to deal with confidential information appropriately. **Employees may share confidential information internally strictly only on a need-to-know basis and where there is a legitimate business objective and only**, where it is third party information, in accordance with the purpose of a confidentiality agreement.

Employees are permitted to share company confidential information with third parties only where an appropriate confidentiality agreement is in place. Employees must report any unauthorised use or disclosure of confidential information to Legal.

> *Confidential information must be restricted to those with a legitimate business need to know, disclosed only once a confidentiality agreement is in place.*

Intellectual Property

Along with our people, intellectual property represents some of our company's most important assets. **Employees must support Mundipharma in ensuring that intellectual property assets are protected, secured, and defended and must avoid infringing the intellectual property rights of other companies. If an employee becomes aware of any unauthorised use of our intellectual property, this must be reported to Legal.**

Employees must likewise avoid infringing the confidentiality rights of other companies and should report any unauthorised use or disclosure to Legal.

Intellectual property refers to the ownership of ideas, designs and brands. It includes copyrights, patents, trademarks, design rights and trade secrets.

Data **Privacy**

We respect and protect the personal data of all individuals, including our employees, customers, patients, and business partners – expecting the same from partners. **Employees must handle personal data per applicable laws, policies, and data protection principles. Any known or suspected personal data breaches must be reported immediately to Legal.**

Data Protection Principles:

- **Purpose limitation**: Ensuring there is a legitimate business need to use personal data. Using the minimal amount of personal data needed for the specific task. Before using personal data for any new purposes, checking if this is permitted.
- **Fairness and transparency**: Informing individuals how and why we use their personal data, who it is shared with and how it is protected.
- **Accuracy and quality**: Ensuring that records containing personal data are kept accurate and up to date, and we only use good quality data obtained from legitimate sources.
- **Security, integrity and confidentiality**: Ensuring there are suitable safeguards to protect the personal data and individuals' rights. Only sharing personal data with those who need to know, and who are under an obligation of confidentiality.
- **Storage limitation**: Storing personal data securely and for no longer than necessary for the specific task in compliance with record retention policies and any legal notices about document holds.
- **Accountability**: Implementing data protection by design and by default. We are all accountable for the proper collection and use of personal data.

Resource Hub:
Data Privacy on the Legal & IP page at MundiConnect.

Responsible Use of Company Resources

Use of Company Assets

Company assets include IT equipment (hardware), IT applications (software), cars, machinery, supplies and inventory.

These resources should be used carefully, professionally and for their intended purpose.

Employees must follow IT policies and procedures to ensure our systems and confidential information are safeguarded. Prohibited uses include illegal activities or accessing/ distributing offensive material.

Company resources may be monitored for security, compliance, or legitimate business purposes as permitted by local laws.

Resource Hub:
Acceptable use policy on IT policies and procedures page at MundiConnect.

Use of **Artificial Intelligence (AI)**

An Artificial Intelligence system is a combination of specialised hardware and software, t**hat can semi autonomously or autonomously execute instructions, make predictions, recommendations, generate content or take actions based on the instructions it receives** or upon on its programmed objectives and learned patterns - including the potential to initiate actions without direct human prompting when conditions warrant.

AI systems are increasingly used to improve productivity (e.g. Microsoft CoPilot), generate content on-demand, i.e. Generative AI (e.g. Dall-E), or perform certain tasks autonomously/ semi-autonomously, i.e. Agentic AI (e.g. Tesla Autopilot). **We are committed to using AI within Mundipharma in full accordance with Ethics, Integrity, Data Privacy and all applicable laws.**

The EU AI Act (Regulation (EU) 2024/1689) is the world's first and most comprehensive legal framework for AI usage and will serve as the guiding framework for AI usage within Mundipharma. The Risk Based assessment system of this framework (Unacceptable Risk, High Risk, Limited Risk, Minimal Risk) is to be used to assess every potential use case. We will seek Legal guidance as and when needed and will keep an eye on any potential regulatory developments in this fast-evolving area.

Resource Hub:
AI policy, Acceptable use of ChatGPT and other Artificial Intelligence (AI) tools page on MundiConnect.

We will treat our data with utmost care with respect to AI usage and we will ensure that no personally identifiable data and/ or sensitive internal data is transmitted into the public domain whilst using public AI tools such as ChatGPT. We use Microsoft Copilot Chat and Copilot 365, which are the approved corporate AI tools when used in 'work' mode.

W**e will foster trust and accountability**: Any customer facing, AI generated content (e.g. Chatbots, Imagery) will be clearly labelled as such. If AI is used in decision making, we will maintain audit trails on when and how the AI system was used.

We understand that all AI models are probabilistic in nature, subject to potential biases based on the data and methodology used to train the model(s). We will proactively seek steps to ensure diversity in the training, and to mitigate any potential biases that might arise.

We will deploy AI based systems internally and externally, in strict accordance with state-of-the-art security best practices and guidelines.

The use of AI in or adjacent to GxP processes requires careful consideration and appropriate controls. A 'human in the loop' should normally be implemented to ensure oversight. Computer Systems Validation (CSV) is typically required, and all such uses must follow the established corporate global approval process.

Our **Partners**

Acting with Integrity – **With Our Business Partners**

Third Party Selection and Oversight

We rely on third party business partners, including but not limited to distributors, vendors, suppliers, customers, licensees, licensors, and consultants, for a wide range of business-essential activities throughout the world and we value our relationship with them. **We will not ask a third party to do something that violates the law or our ethical standards**.

We also recognise that legal or ethical failures on the part of business partners can lead to serious legal, financial, and reputational consequences for Mundipharma and potential negative impact/outcomes for the patients we treat. As such, we require business partners to commit to ethical business practices and standards that align with those of Mundipharma and that fully comply with applicable laws, regulations, and industry codes.

To help us select ethical business partners, employees must ensure that company-required due diligence is completed, documentation such as a signed contract is in place, and any other required steps are completed prior to authorising services or providing products to third parties.

Resource Hub:

- Procurement page,
- the Third Party Risk Management Process on the Compliance page,
- the Contracting Resource Area on the Legal & IP - Home page,
- the FSSC - Suppliers, HCOs & HCPs page on the Finance page,
- the IT Security Assessment Request form in ServiceNow (check with your IT Business Partner if this is required)
- on MundiConnect.

Working with **Third Parties**

Once a third party is engaged, employees must remain diligent and act promptly upon becoming aware of or suspecting behaviours that are not in line with our standards, including this Code and our policies, and must carefully monitor for any quality issues throughout the engagement and raise or report them in a timely manner, as such issues can ultimately impact data integrity and patient safety. We also encourage our business partners to raise questions or concerns to us if they feel that we are not upholding our commitments as set out in the Code.

Third Parties and Due Diligence

Third parties are external parties we work with to conduct our business and provide our products safely to patients. They may provide goods (such as raw materials, packaging or laptops) or services (e.g., consultancy, marketing or customs management) to us, or they may be customers who receive our products for use with patients

Third party due diligence is the process of identifying and assessing risks associated with engaging with external entities like vendors, suppliers, and partners, to help us select third parties that are committed to lawful and ethical business practices in addition to GxP compliance where applicable. It includes reviewing publicly available information about the third party's commercial operations, experience and capability, ownership, reputation, legal history, etc. as well as performing GxP audits where applicable.

Resource Hub:

- Anti-Bribery & Corruption (ABAC) Policy,
- Third Party Risk Management Process on the Compliance page at MundiConnect.

Human Rights

We respect the dignity and human rights of all people and recognise the important role that businesses play in society to prevent and stop human rights abuses such as forced labour, human trafficking, and child labour.

We endorse and are committed to following international human rights standards, including the United Nations Guiding Principles on Business and Human Rights and the Minimum Age Convention, and expect our third party business partners, including distributors, vendors, and suppliers, to do the same.

Employees and third parties are requested to keep vigilant and report any signs of human rights concern in our businesses or with third party business partners.

Resource Hub:

- Sustainability Statement of Intent: our ESG pathway,
- Modern Slavery Report | Mundipharma,
- Diversity, Equity and Inclusion page on MundiConnect.

Our **People**

Acting with Integrity – **In How We Work Together (Our Employees)**

Our **Culture**

At Mundipharma, fostering a **diverse, fair, equitable and inclusive culture is a priority**. We celebrate the wide range of backgrounds, experiences and cultures represented by our employees. We firmly believe that encouraging employees to share their different perspectives, thoughts and talents will provide a better work environment and will unlock greater innovation and creativity for our customers, healthcare providers and patients.

All employees are expected do their part to create an inclusive environment and be respectful of one another's unique characteristics, perspectives, and identities.

Our vision is to continue building a culture that embraces and celebrates diversity and uniqueness. We strive to create an environment where we all feel respected and belong, where we all can be our authentic self every day without fear of judgement.

Mundipharma aims to ensure that all employees can expect:

- To be treated with **dignity and respect** at all times.
- To be **given equal opportunities** for career and personal development based on merit, competence and potential.
- To be **aware of and have access to appropriate procedures** to raise any concerns, and have those concerns dealt with fairly and sympathetically.
- To have **access to training**, be provided with knowledge and to facilitate positive interaction, without prejudice or discrimination.

Employees are expected to:

Lead by example

Actively champion inclusive behaviours, challenge bias and be accountable.

Embed Diversity, Equity & Inclusion into culture

Welcome diversity, equity and inclusion into all parts of the business.

Engage

Show up and make space for everyone to get involved.

Learn

Reach out to learn more.

Employee **Wellbeing**

We are committed to supporting the wellbeing of our people. This means providing resources, tools, and initiatives that help employees thrive both personally and professionally. Examples include:

Access to wellbeing resources and confidential support services.

Participation in global campaigns such as World Mental Health Day (WMHD).

Regular initiatives like Wellbeing Wednesday to encourage balance and resilience.

Be the Difference Programme

This programme aligns with our purpose and mission, including three commitments to empower change:

Our people: Build an inclusive company where everyone can thrive.

Our communities: Make a positive and measurable impact.

Our environment: Reduce our company's impact on the environment.

Be the Difference

Since its launch in 2021, our Be the Difference programme **has helped us to make a positive impact on those around us**, here at Mundipharma and in our communities.

Aligned with our purpose – **where care and collaboration meet, to make a difference when it matters most** – and our mission, **United for Patients**, our Corporate Social Responsibility (CSR) programme, Be the Difference has three commitments: to People, Communities and the Environment.

As part of Be the Difference, **every Mundipharma employee receives up to two volunteer days** per year to take part in events and activities to support our communities.

Be the Difference **helps us bring our purpose to life** for our people, our communities and our environment.

Discrimination and Harassment

Mundipharma is **committed to providing equal employment opportunities to employees and applicants**. We will not tolerate any discrimination based on, and not limited to, age, disability, marriage or civil partnership status, pregnancy, race, ethnicity, nationality, colour, religion or belief, gender identity, expression or gender reassignment, sexual orientation, genetic information, medical condition, educational background, or any other characteristics protected by local law or regulation.

Managers and leaders are required to be consciously aware of bias and apply employment practices fairly and objectively, including decisions in relation to recruitment, promotion, reward, working conditions and performance.

We do not tolerate harassment, bullying or other unprofessional behaviour, whether through written communications, visual images (for example, pictures and/or videos of a sexual nature or embarrassing photographs and/or videos of colleagues), email, phone, etc.

Employees must not engage in any such behaviour, including but not limited to including spreading rumours, insulting, ridiculing, or demeaning others, misusing power or position, engaging in unwelcome sexual advances, making threats about job security, or intentionally blocking promotion or training opportunities.

If you observe or experience such behaviour, you are encouraged to speak up and report it through the Integrity Line, to your manager, HR or Compliance.

Resource Hub:

- HR Hub - Home,
- Curiosity Space,
- Diversity, Equity and Inclusion page on MundiConnect.

Health and Safety

At Mundipharma, we are committed to providing a **safe workplace for all employees and visitors**, whether that is while working in a company office, at home, on a manufacturing site, while traveling or at off-site meetings.

Any accidents, incidents, near misses, or safety observations should be reported to the designated Health and Safety department email address.

Responsible Communication

The way that we communicate information has important legal and reputational consequences for our company and only authorised individuals can make comments on behalf of Mundipharma.

Employees must always ensure, when communicating with others, that they do so in line with our values of **integrity and doing the right thing** and bearing in mind that communication may be forwarded to unintended recipients, made public or used in an investigation.

Four Guiding Principles of Communication

In your business communications, you must follow the four principles of careful communication.

Clear: Use a simple and understandable style; avoid ambiguous or colloquial language that could be misinterpreted.

Correct: Ensure the information is complete and accurate; be objective and use facts rather than opinions.

Concise: Be precise. Avoid lengthy sentences. Do not share information with people who do not need to be involved.

Considered: Write only what you would be proud to have published externally or known by others.

Follow company rules on **Confidential and Restricted information**.

Social Media

Social media refers to any website or application that allows individuals to create and share content or participate in social networking. We use social media to raise awareness, engage with our target audiences and increase traffic to our websites. Employees are required to use social media responsibly and in compliance with applicable laws, regulations, industry codes and company policies.

In addition to social media, **employees are not authorised and must not engage with the media under any circumstance** without consultation and approval from the Global Communications & Corporate Affairs function head. This includes, but is not limited to, engagement regarding Mundipharma business, products, therapeutic areas and/or programmes or any general industry commentary.

Please contact Global Communications & Corporate Affairs with any questions about media or social media activity.

Resource Hub:
Communications and Corporate Affairs page on MundiConnect.

Our **Planet**

Acting with Integrity – **For Our Planet and Society**

Environmental, Social and Governance (ESG) and Sustainability

In a world facing urgent environmental and social challenges such as climate change, biodiversity loss and economic inequality, our responsibility extends beyond financial performance; we must act as stewards for people and the planet.

We are committed to operating responsibly and sustainably across all aspects of our business. From manufacturing to supply chain partners, and engagement with healthcare providers, sustainability is not a separate initiative; it is part of how we work every day.

Our approach is guided by internationally recognised principles, including the **United Nations Sustainable Development Goals (UNSDGs)** and **relevant codes** as applicable to your region for ethical interactions with healthcare professionals and patient organisations.

These frameworks help us identify and manage environmental, social, and governance (ESG) issues and opportunities throughout our value chain.

Why Climate Change & Sustainability **Matters**

Embedding sustainability into our decisions builds trust with patients, partners, and communities. It strengthens our resilience, supports innovation, and ensures we contribute positively to society and the planet.

What Does This **Mean For You?**

Every colleague plays a role in delivering our ESG commitments. In our daily work we must strive to:

Protect the environment by:

- Reducing greenhouse gas emissions. We are aiming to achieve Net Zero by 2045 across our entire value chain. This will require reformulation of products using lower global warming potential propellants.
- Minimising waste, particularly of plastics such as PVC.
- Using resources more efficiently and,
- Conserving biodiversity

Respect human rights: Treat everyone with dignity and fairness; speak up if you see risks of harm or unethical behaviour.

Be transparent: Report ESG data accurately and promptly. Non-financial data can be as important as financial data in decision-making. We must ensure data is accurate so our leadership can make well-informed decisions and provide external partners with confidence in our operations.

Work with integrity: Ensure suppliers and partners meet our ESG standards and raise concerns if they do not.

Consider impact before making decisions, ask how it will affect people, society, and the environment.

Ask whether we can achieve the same business outcomes in a more sustainable manner? For example, do I need to travel for a particular meeting, or can it be held virtually? Do I need to print this document?

Our **Expectations**

We integrate ESG into our operations, supply chain management and product development.

We expect suppliers and partners to uphold equivalent standards on human rights, labour conditions, anti-bribery, and environmental stewardship. We measure and disclose progress in line with global frameworks and regulatory requirements.

More information can be obtained by emailing the Mundipharma Sustainability Team.

Resource Hub:

- Statement of Intent: our ESG pathway,
- Modern Slavery Report,
- Diversity, Equity and Inclusion page on MundiConnect.

For More **Information**

This Code of Conduct is supported by detailed policies, procedures and resources to help guide you. For more information, please check the available policies or procedures on MundiConnect or within your respective organisation.

If you have any questions about the Code or our policies, procedures and relevant trainings, please consult the following functions:

Compliance can offer guidance on Code questions, including the following:

- The Code
- Interactions with healthcare professionals
- Third party risk management (TPRM) process.
- Bribery and corruption
- Conflicts of interest
- Gifts and entertainment
- Grants and donations
- Integrity Line

Legal can explain and interpret the Code, laws and regulations and provide guidance on legal and privacy matters, such as:

- Data privacy (including to report data breaches)
- Fair competition
- Confidential Information & Intellectual property
- Insider trading
- Trade sanctions and export controls
- Modern Slavery

Scientific and Medical Affairs can provide guidance on:

- Approval of promotional materials and messages
- Medical education
- Managing unsolicited requests for off- label information
- Research and development including investigator initiated trials
- Interactions with healthcare professionals, patients and patient organisations
- Pharmacovigilance, Product safety (including reporting adverse effects)
- Product licences and regulatory requirements
- Engagement with Health Authorities

Human Resources can explain and answer questions about employment policies, benefits and workplace matters, including:

- Health & Safety
- Employee wellbeing
- Diversity, Equity & inclusion (including Non-discrimination)
- Harassment
- Employee behaviour guidelines
- Human Rights

IT protects the employees' assets, computing systems and records. Contact IT Compliance and Security to seek guidance on:

- Use of company IT equipment (hardware) and applications (software)
- Reporting of potential information security breaches

Corporate Communications can help answer questions and provide guidance on:

- Responsible communication
- Global Internal, External Communications and Media Relations
- Social media use

Quality can explain and answer questions regarding the quality and safety of our products including:

- Reporting quality complaints or other concerns/safety information.
- Advise on GxP questions you may have regarding use of systems, manufacture and distribution of products, training, research and clinical trials or pharmacovigilance.

Finance can address questions related to:

- Financial integrity
- Anti-Money Laundering
- Fraud
- Indirect vendors
- Travel and Expenses

The Sustainability and ESG function manage our policies, controls and disclosure for ESG and can provide specific advice on:

- Environmental impact including carbon reduction (net zero) plans
- Life cycle analysis of products
- Circular economy principles
- Governance
- Non-financial reporting