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MESSAGE FROM THE CEO

The present Code of Conduct (CoC) serves as a synopsis of Pharmathen's corporate culture and constitutes a concrete guide on how members of the Pharmathen Group of companies are expected to behave while working for or on behalf of Pharmathen. Our CoC and supporting policies enable us to work and deliver products, in line with the laws, regulations, guidelines and standards that apply to Pharmathen around the world. All employees, executives and shareholders of the Pharmathen Group are expected to adhere to the principles contained in the present CoC and demonstrate the highest standards of integrity, transparency and accountability.

For Pharmathen, Integrity, transparency and accountability are more than ethical principles. They are principles we have turned into our flagship commitments, whatever their outreach in any part of our daily or strategic operations.

Transparency is part of our DNA. We are committed to fostering a culture in which integrity is woven into the fabric of everything we do. We believe that sharing this same set of principles with each and everyone we do business with, may it be a customer, supplier or employee, is a critical part of our success and so we have chosen to demonstrate this commitment in all facets of our day-to-day operations both internally and externally.

At Pharmathen, we thrive through innovation but never forget to innovate responsibly.

A stylized, handwritten signature in white ink, likely belonging to Dimitris Kadis, the CEO of Pharmathen. The signature is located in the bottom right corner of the page, above the name and title.

Dimitris Kadis
Group CEO



CHAPTER



OUR
TEAMMATES
OUR ASSETS
OUR DATA

EMPLOYMENT & LABOR RIGHTS

At Pharmathen we believe that our people are valuable partners that put their energy and effort into achieving our business goals. We praise ourselves for creating and maintaining a safe and healthy workplace while embracing diversity. We have created an anthropocentric and safe working environment, where all employees all over the world, are treated respectfully and given equal opportunities to perform their best and achieve their personal aspirations and career development.

We strictly adhere to all applicable national and European labor and social security laws, the UN guiding principles on business and human rights as well as the International Labor Organization's (ILO) conventions and recommendations, while doing our absolute best to guarantee our employees' rights, freedoms and overall well-being.

Non-discrimination, inclusion and equal treatment

At Pharmathen, no person is subject to any discrimination due to his/her age, gender, origin, marital status, pregnancy/childbirth, religion, sexual orientation, political opinions and disabilities. Equality at work means that all individuals should be accorded equal opportunities to fully develop their knowledge, skills and competencies that are relevant to their current or future roles. Pharmathen bases employment relationships on the principles of equal opportunity and fair treatment. Qualifications, skills and experience shall be the basis for recruitment, access to training, performance and/or promotion.

Inclusion recognizes and values our differences, harnessing them to enrich our working lives and enable superior performance. It involves not only removing bias, but also the creation of an environment of acceptance and respect in which every individual is encouraged to thrive and be the best he/she can.

Diversity and inclusion must work together, as they are keys to the success of our business.

Our intention, when prioritizing diversity and inclusion at Pharmathen, is to create a diverse and inclusive workforce and to recognize the human rights and equal opportunities of our employees.

Non-harassment or bullying

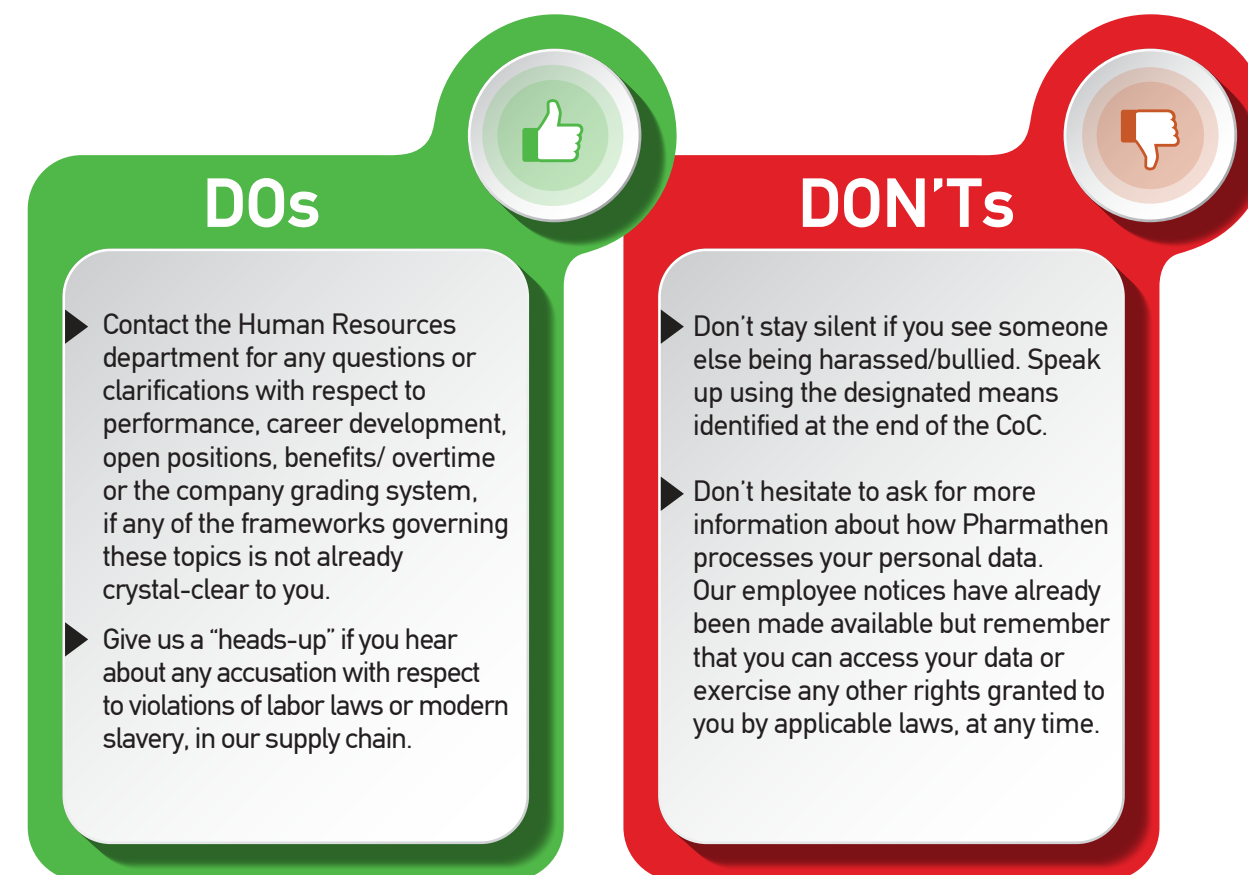
Maintaining a positive working environment, has been and continues to be our priority. We have adopted a zero-tolerance approach to all types of harassment (including mental, physical and sexual harassment) and ardently encourage our employees to report any incident they feel constitutes any form of harassment/ bullying. All confirmed incidents of harassment lead to the termination of the culpable employee's contract with Pharmathen.

Working hours and wages

We fully comply with any applicable legislation on working hours and wages, including provisions on overtime and any mandated benefits. Our employees' compensation scheme is communicated to them, in a clear and timely manner, with reference to any applicable bonus scheme or other benefit they may be entitled to, based on their individual contract. Any overtime work, when requested, is always compensated promptly and at the applicable rate, according to the applicable laws in force.

Modern- slavery

Pharmathen takes every possible step towards combatting modern-slavery and human trafficking and ensuring that none of them is manifested within its realm. Working towards that end-result, we have extended our compliance program towards the direction of ensuring that no slavery or human trafficking will take place in both our own business and that of our supply chain. We take the upholding of these high standards seriously and do not tolerate slavery, human trafficking, forced, bonded, indentured labor or child exploitation of any kind, from wherever it stems.



Key definitions

Harassment: The act of systematic and/or continued unwanted and annoying actions of one party or a group, including threats and demands, for sexual/racial/personal reasons.

Discrimination: Any distinction, exclusion or restriction or preference, which is based on any ground such as race, culture, ethnic origin, nationality, sexual orientation, religion, physical handicap, or other characteristics not relevant to the issue in question.

Modern slavery: The recruitment, movement, harboring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It includes slavery, servitude, forced or compulsory labor and human trafficking.



PROTECTION OF COMPANY ASSETS

As a company we need to safeguard our assets and ensure they are protected against any mistreatment or exploitation. To this end,

we make sure to identify corporate assets, constantly remain fully aware of their status and treat them as our own (if entrusted to us).

The efficient management of company assets allows us to complete our day-to-day tasks unencumbered but also it enables us to keep accurate books/records and transaction inventories, in compliance with applicable laws (ex. tax laws etc).

Tangible assets

We each have a duty to protect Pharmathen's tangible assets and resources such as office equipment, vehicles, technological equipment, production and manufacturing lines, raw materials, ready products, documents etc. Pharmathen's assets are used for business purposes and objectives whereas limited and occasional personal use may be permissible only when internal policies stipulate it.

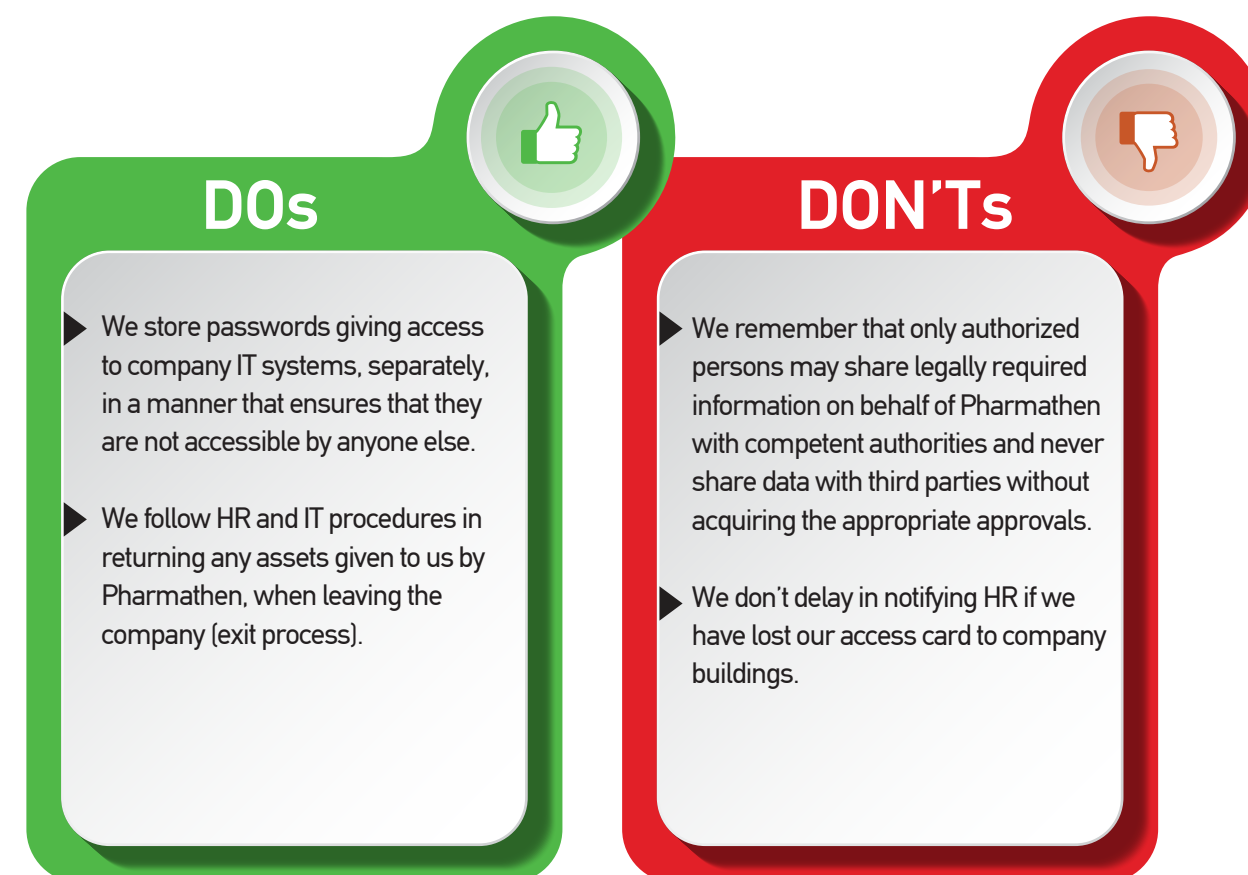
Intangible assets

Our company's intangible assets include our goodwill, intellectual property rights, software, other types of confidential information (see chapter 3 below) etc.

To make sure that both tangible and intangible assets are well-protected, we carefully read and respect all policies and procedures shared with us, pertaining to a. the physical security of assets and buildings/premises, b. IT and data security and c. Record Keeping.

More specifically:

- We follow standard operating procedures in order to prevent any misuse of information technology.
- By the same token, we respect the assets of third parties, in particular, third party intellectual property rights and trade secrets, in order to ensure that we are not exposing Pharmathen to liability.
- We keep in mind that the misuse of company's assets, theft or carelessness may have a severe impact on Pharmathen's profitability and functioning.



Key definitions

Intellectual Property Rights: patents, trademarks, copyrights, industrial design rights etc. Any literary work produced within the frame of working for Pharmathen, is subject to copyright. The copyright belongs to Pharmathen.

Third party Intellectual Property Rights: IP rights held by Pharmathen's suppliers, customers, external consultants etc.

CONFIDENTIALITY & PERSONAL DATA

When it comes to maintaining confidentiality, Pharmathen places the barrier high.

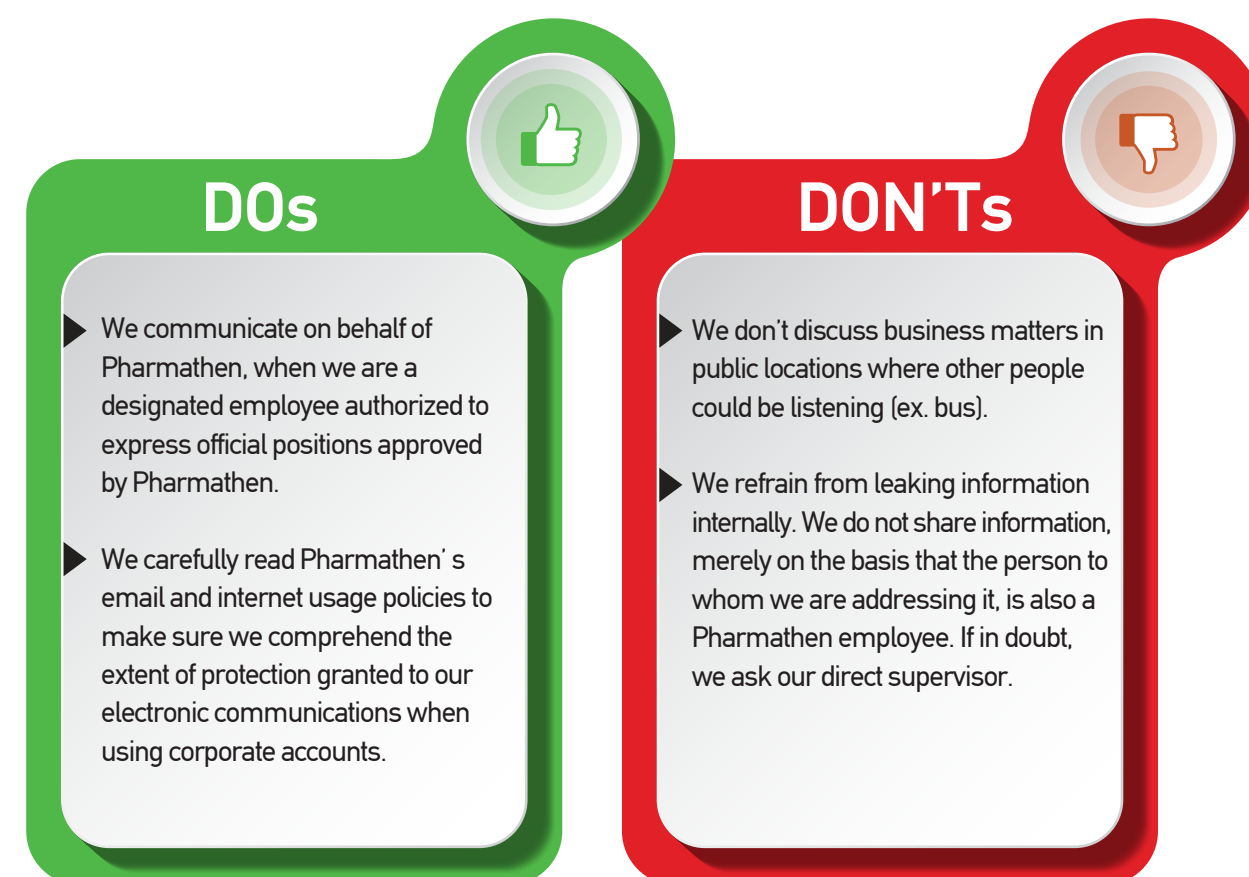
All information, regardless of its source or form, to which an employee is granted access under his/her capacity as a Pharmathen employee, is treated as confidential information, unless already publicly available.

Examples of confidential information may include but are not limited to: business plans and strategies, financial and pricing information, clinical/research/technical data, personal information of business partners/customers, information concerning our employees, IP etc.

Principles followed with respect to confidential information

- **Externally:** We are all expected to protect Pharmathen's confidential information and not disclose it to third parties, unless required to do so within the frame of Pharmathen's business operations. Nobody may remove any documents or items belonging to Pharmathen or otherwise containing confidential information from Pharmathen's premises, without prior authorization.
- **Internally:** We make sure information is accessed on the basis of proper authorization so as to prevent any internal leaks. Information is subject to data classification. We make sure to respect access rights to confidential information and by default share information on a need -to- know basis, only for business purposes.
- We take very **strict IT security** measures to enhance the way confidential information is safeguarded within Pharmathen. For this reason, we use antivirus software, password protected systems and processes to monitor and detect any breach of security, even when working remotely.
- We are particularly diligent when confidential information also includes/ constitutes **personal data**. In these cases, we make sure that any processing of such data complies with Pharmathen's personal data policies.

- We make sure that before we enter into business discussions with a third party, there is a **confidentiality/ non-disclosure agreement** in place. If not, we make sure to contact the Legal Department. We always include confidentiality clauses in all binding contracts.
- We keep into perspective that confidential information may be **legitimately disclosed**, for specific purposes, in cases in which regulatory bodies or other competent authorities may request it, for investigation or audit purposes or when transactions involving the public domain require such a disclosure.
- Individuals breaching confidentiality, either during the employment period or after, may be subject to **disciplinary and legal actions**, even if the disclosing party did not actually benefit from the disclosure.



Key definitions

Personal data: any information which relates to a living individual who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifiers or one or more factors specific to the physical, physiological, economic, cultural or social identity of that living individual.

Data classification: The categorization of data/information based on access rights to said data (ex. restricted access/ free for internal use/public etc.).

CHAPTER

2

OUR INTERACTIONS WITH THIRD PARTIES



ANTI-BRIBERY/ ANTI-CORRUPTION

At Pharmathen, corruption and bribery are not tolerated.

We are firmly committed to carrying out our business activities with full transparency and request the same from all our counterparties.

Active and passive bribery

We do not, directly or indirectly, solicit/ induce payment and/or offer, transfer, pay, receive money, benefits, advantages or other items of value or take any action that could be considered a bribe, to influence the actions of:

- A. any private person (commercial bribery) and
- B. any government official, or other person acting in an official capacity on behalf of a government official or government-controlled entity, with the intention to improperly secure business or advantages or to influence the recipient's behavior to our advantage.

Anti-corruption and other illegal activities

We explicitly abstain from and do not enable or facilitate the commissioning of any form of corrupt business, embezzlement, fraud, theft, terrorism, money laundering or other financial crimes. To this end, we have adopted and apply due diligence processes before entering into transactions with our business partners. In addition, we follow standardized procedures for selecting/ approving suppliers and concluding contracts

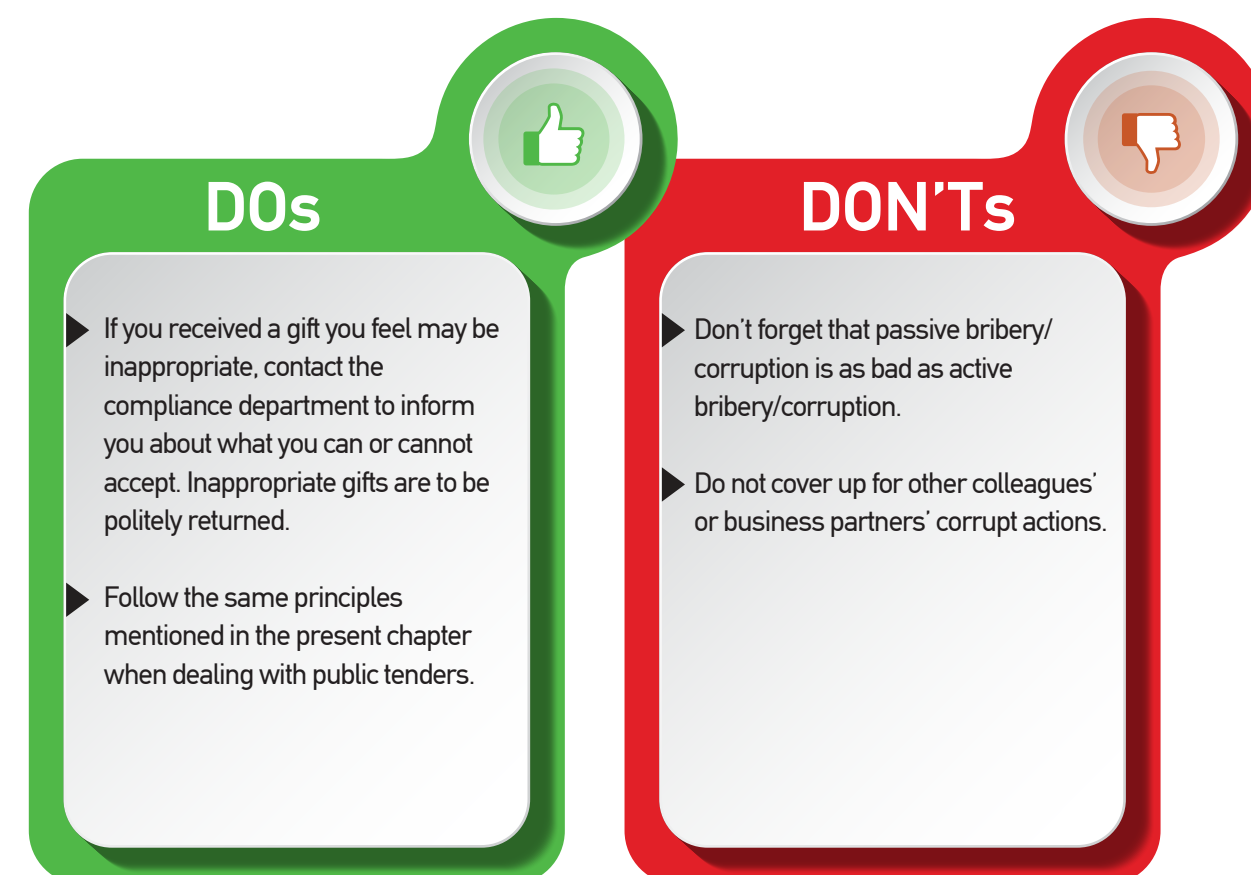
Gifts and entertainment

We do not give or receive gifts or other benefits that could be perceived as extravagant or inappropriate. Gifts and entertainment may be given or received, only when the below conditions are met:

- a. they are unsolicited;
- b. they are of minimal/ modest value and do not go beyond common courtesy (ex. wine, flowers, gift basket, promotional materials such as diaries etc.);
- c. they fall under common business practices or are given at specific commonly recognized occasions (weddings, Christmas etc.);
- d. they are not given/ received on a frequent basis;
- e. their delivery or receipt does not intend to influence any decision-making process;
- f. they are not addressed to government officials etc. (see below).

Public and Government Officials

We pay extra attention and caution when dealing with governments, governmental agencies, political parties, European Union institutions, international organizations and their officials. No gifts, entertainment, hospitality or other benefits that could be considered as influencing any business decision or may give the impression of an improper advantage, can be offered, directly or indirectly, to public and government officials or any other above-referenced individual.



Key definitions

Bribery: The offering, giving, receiving, or soliciting of something of value with the corrupt aim of influencing the actions of an individual in the discharge of his/her professional/ public/ private/legal duties. Proposing/ giving a bribe, constitutes a form of active bribery, whereas requesting or merely accepting a bribe constitutes a form of passive bribery.

Bribe: A bribe could be anything of value, a financial or other advantage/benefit. It could take the form of money, gifts, services etc.

Corruption: An act done with an intent to give some advantage inconsistent with official duty and the rights of others. It includes bribery but is more comprehensive.



CONFLICT OF INTERESTS

A conflict of interest may arise when a competing interest interferes or could be perceived as interfering with our ability to make an impartial business decision. Our employees are expected to detect and evaluate the situations that could lead to such conflicts and avoid any act or behavior which could undermine their own integrity as well as Pharmathen's reputation.

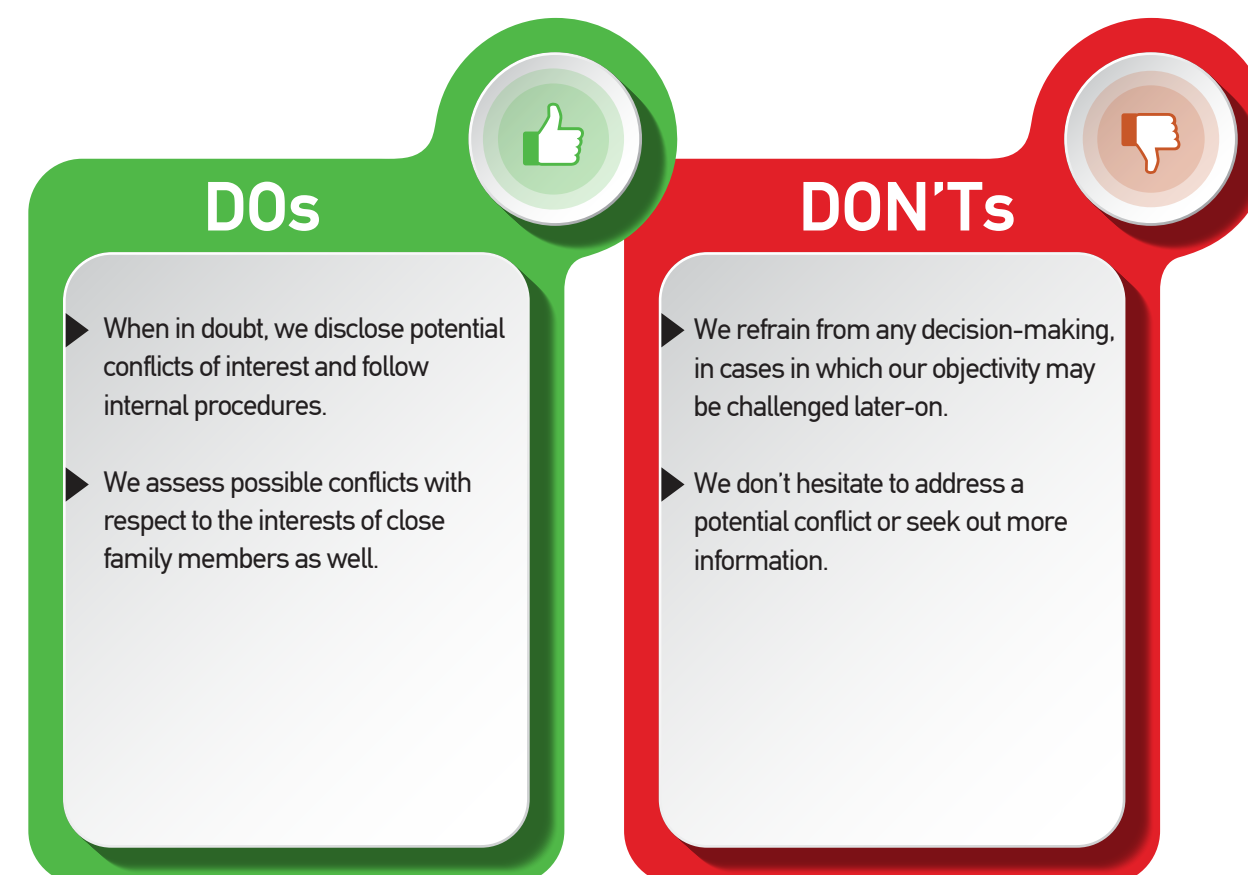
Some examples of scenarios that could lead to a conflict of interest and call out for clear judgment, are the below:

- a.** considering relatives for jobs, awards, entry into supplier contracts or other favorable affiliations, on behalf of Pharmathen;
- b.** supervising closely related persons (ex. relatives);
- c.** taking advantage of opportunities (ex. investment opportunities), or engaging in activities, which could have been discovered or triggered by information or relationships developed due to one's capacity as a Pharmathen employee/ executive;
- d.** having professional engagements outside of Pharmathen, which involve Pharmathen's customers, suppliers or competitors ex. outside employment, board memberships;
- e.** accepting gifts, hospitality or entertainment from third parties involved in Pharmathen's business activities.

In cases in which a conflict of interest exists or may be deemed to exist, we need to take the following steps:

We avoid business or personal dealings that may lead to a conflict of interest or create prejudice against business interactions, in the first place.

On the occasion we involuntarily find ourselves before a conflict of interest, we report it using the methods identified below and follow the actions recommended by Pharmathen's compliance department. The mere existence of a conflict of interest is not a stigma. It does not necessarily signal that a transaction is unlawful or otherwise forbidden, ethically speaking. It does however signify that specific measures will need to be taken to ensure that no undeserved prejudice shall fall upon people, transactions or other business activities of Pharmathen. Examples of such measures are: excluding the person having the conflict, from any decision making process with respect to the particular conflict-generating situation, requesting further documentation/ declarations, requesting specific approvals etc.



Key definitions

Conflict of interest: A conflict of interest is a situation in which someone has competing professional or personal or financial obligations / interests that would make it difficult for him/her to fulfill his/her duties in a fair and objective manner.

FAIR COMPETITION

At Pharmathen, we ardently believe that the active enforcement of competition law contributes to the provision of more affordable medicines and more options for patients and health systems, thereby further promoting innovation.

We strictly comply with all applicable anti-competition laws, at EU and national level, preventing unfair business behaviors having the effect of restricting or distorting competition and follow any progress in this field consulting EU institutions' and OECD's reports.

Our interactions

One of our main concerns is to safeguard the legitimacy of all interactions (agreements and coordinated practices) with our suppliers, customers and competitors wherever they may take place.

Interaction with customers/suppliers (vertical agreements): When entering into agreements with customers or suppliers, we ensure that no terms and conditions may be perceived as incompatible with applicable competition laws

Interaction with competitors: Pharmathen only interacts with competitors provided that the following conditions are met:

- a. there is a legitimate reason for said interaction and
- b. said interactions do not restrict or hinder fair competition in any manner.

We do not enter into discussions/ agreements with competitors or any third party for the purpose of unlawfully allocating markets and customers or restricting trade.

Tenders

Pharmathen, when participating in tenders, respects the applicable national tender law regulations, throughout the tender process. It is of great importance for us to maintain transparency and accurately provide any data requested by national authorities, at every step of the procedure.

Abstention from prohibited practices

Pharmathen seeks competitive benefits through lawful means and abstains from any abusive and prohibited activities.

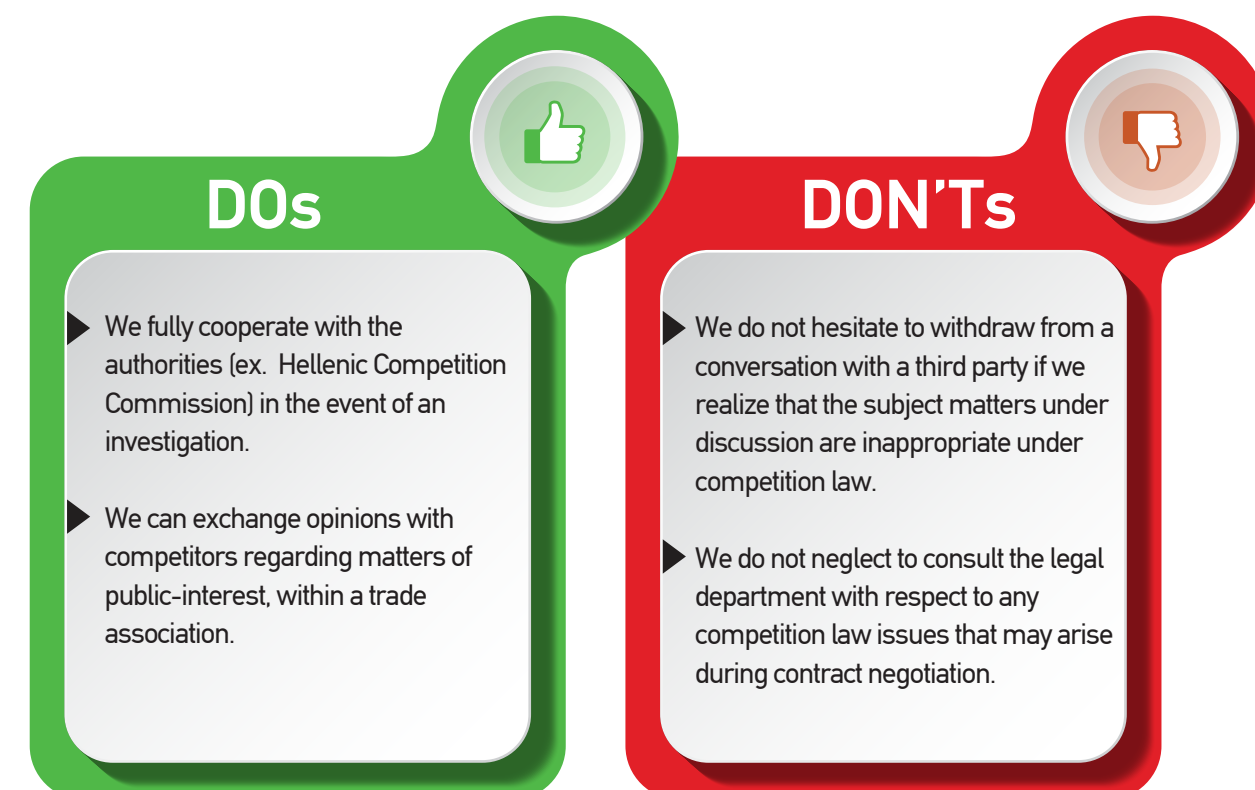
At Pharmathen, you will never see us:

- a. selling our products at extortionate prices;
- b. setting artificially low prices to exclude our competitors from the market;
- c. discriminating against our clients or treating them with unjustifiable different commercial terms and sales conditions;
- d. unreasonably refusing to sell and deliver our products;
- e. abusing a potential position of market dominance, boycotting suppliers etc.

Mergers and acquisitions

Competition laws set extensive rules to be followed when mergers and acquisitions take place. Pharmathen, as a rapidly developing group of companies in the pharmaceutical sector, makes sure to:

- a. follow any "merger-control" rules and regulations when engaging in mergers and acquisitions;
- b. obtain approvals from the competent authorities when so required and
- c. only exchange information that is sensitive, competition-wise, to the extent it is allowed to do so.



Key definitions

Vertical agreements: agreements with business partners that do not operate at the same level of production or distribution chain.



TRADE CONTROLS & SANCTIONS

At Pharmathen, we are proud of our international business presence and eagerly assume all the responsibilities that this presence entails.

We always bear in mind that depending on the location in which Pharmathen operates, various national/ EU or international laws and regulations regarding customs, trade and export controls, may apply.

Custom, import and export controls

We do not, directly or indirectly, solicit/ induce payment and/or offer, transfer, pay, receive money, benefits, advantages or other items of value or take any action that could be considered a bribe, to influence the actions of:

- A. **Import export controls:** Prohibitions or restrictions on the import, export, transit or domestic trade of Pharmathen products may apply for various reasons, including: the country of destination, the ingredients of the product or even the identity of a counterparty. When a license or permit is required, we make sure that it is obtained before the import/export/re-export/ domestic transfer of the product.
- B. **Customs:** Custom laws provide for timely controls in order for shipments of any type or quantity of product, to pass customs clearance and get dispatched globally. Pharmathen makes sure to fully comply with any applicable customs laws.

Sanctions/ Restrictive measures

Sanctions are measures imposed against countries, entities or individuals, that may be comprehensive or list-based (ex. EU Consolidated List, OFAC's Specially Designated Nationals List etc.) and could include financial/ trade/ travel restrictions, asset freezes, prohibitions to satisfy claims, arms export prohibitions or other penalties/bans. These measures are used to protect national or supranational security interests, enforce international law or defend against threats to international peace and security (ex. from terrorism).

Pharmathen complies with all applicable sanctions regimes including those administered pursuant to decisions/ regulations / resolutions of the Council of the European Union, the US/OFAC or the United Nations Security Council.

Pharmathen has adopted and implements an extensive sanctions screening process to ensure that its suppliers and customers are not subject to sanctions.

DOs

- ▶ Make sure that all necessary licenses are in hand before importing/exporting/re-exporting products, to ensure that Pharmathen is not subject to civil/criminal liability or loss of export privileges.
- ▶ Check that you have received confirmation from the compliance department stating that the sanctions-screening procedure has been successfully completed, prior to entering into any agreement - with or involving - counterparties located in destinations subject to sanctions regimes.

DON'Ts

- ▶ Don't neglect to make sure that when declarations are submitted to competent customs authorities, they are accurate and include complete and detailed information on applicable items.
- ▶ Don't forget that items provided free of charge ex. samples, are not excluded from the implementation of applicable customs laws.

Key definitions

OFAC: Office of Foreign Assets Control ("OFAC") within the U.S. Department of Treasury

Comprehensive sanctions: Comprehensive sanctions prohibit nearly all commercial or financial transactions with a particular territory, including companies and persons based in those territories. Sanctions imposed by the US to Iran and North Korea fall under the comprehensive- sanctions category. US regulations may provide general licenses/exemptions authorizing the performance of certain categories of transactions even in cases where comprehensive sanctions apply. OFAC also issues specific licenses on a case-by-case basis under certain limited situations and conditions.



CHAPTER

3

OUR
RESPONSIBILITY
TOWARDS
PATIENTS
& SOCIETY

RESEARCH ETHICS & PATIENT SAFETY

Pharmathen, when performing innovative research, developing, or delivering pharmaceutical products, may wear different “hats”, depending on the task at hand. Pharmathen acts as a manufacturer, a clinical trial sponsor, a marketing authorization holder (subject to Pharmacovigilance obligations) and the list goes on.

No matter the “hat” under which we perform our activities, our one compass, is the safety of patients and clinical trial participants, alike.

We strictly abide by all national, European and international laws and recognized standards, best practices and guidelines pertaining to ethical research activities and the protection of patient safety.

As a manufacturer of pharmaceutical products:

- a. We follow Good Manufacturing Practices (GMP);
- b. We maintain high-quality standards and procedures and make sure to report any problem in the quality or safety of a product in a timely fashion;
- c. We provide up-to-date patient information leaflets which clearly communicate any potential risks to patients.

As a sponsor of clinical trials:

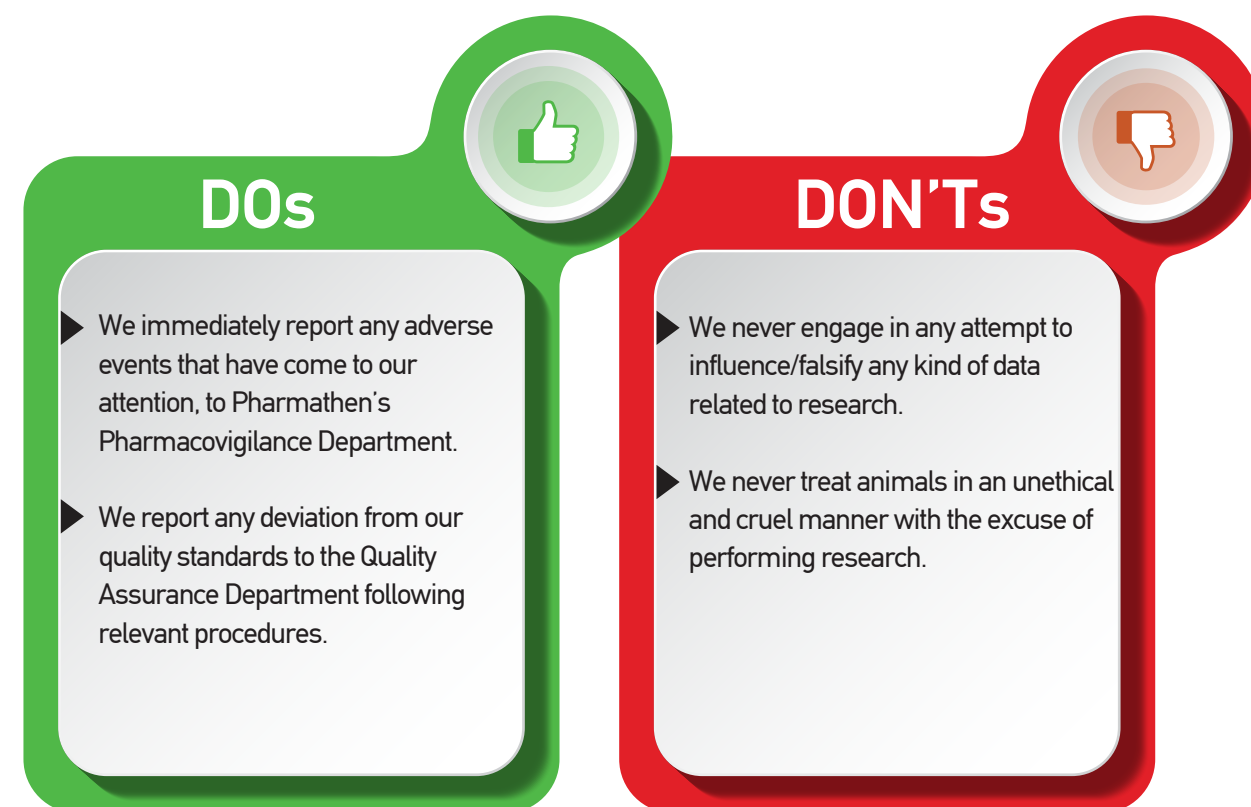
- a. We follow Good Clinical Practices (GCP) and the Declaration of Helsinki principles in all our clinical research involving human participants;
- b. We make sure accurate results are always reported even when including negative findings;
- c. We respect the personal data of all participants in clinical trials and follow informed consent procedures, in compliance with applicable data protection laws;
- d. We also follow OECD's Good Laboratory Practice (GLP) principles in our non-clinical studies, to promote the development of quality test data and ensure a sound approach to the management of laboratory studies, including conduct, reporting and archiving;
- e. We are committed to maintaining the integrity of clinical data in order to be able to guarantee that our regulatory submissions are founded on data of the highest quality.

As a Marketing Authorization holder and independent provider of pharmacovigilance services:

- a. We have a thorough and reliable Pharmacovigilance system in force, in order to collect, collate and evaluate information about suspected adverse events. In that way, we ensure the safe and effective use of medicinal products via providing timely information to patients, healthcare professionals and the public.
- b. We train Pharmathen employees on reporting adverse events, in compliance with the Pharmacovigilance department's standard operating procedures

Animal welfare

Pharmathen keeps animal testing to an absolute minimum. We adhere to all applicable animal welfare laws which have been put in place to ensure the respectful and responsible treatment of animals involved in research activities. In cases in which animal involvement is inevitable for the completion of a research project, high standards of animal welfare, consistent with those required by law, are guaranteed, via the selection of competent clinical research organizations satisfying said criteria.



Key definitions

Adverse event: An event occurring after the administration of a pharmaceutical product (unfavorable medical occurrence), which does not necessarily have a causal relationship with said pharmaceutical product.

MARKETING PRACTICES & DISTRIBUTION

At Pharmathen we are committed to acting with high integrity and transparency standards, every step of the way.

That includes our distribution and marketing practices (labeling requirements, samples, promotional material etc.).

Distribution

The distribution of our products is fully compliant with all national and European laws/regulations/guidelines/codes of practice within the pharmaceutical sector, including good distribution practices (GDP standards) making us proud to say that the quality of our products is always safeguarded, to the maximum possible extent, until they reach our customers.

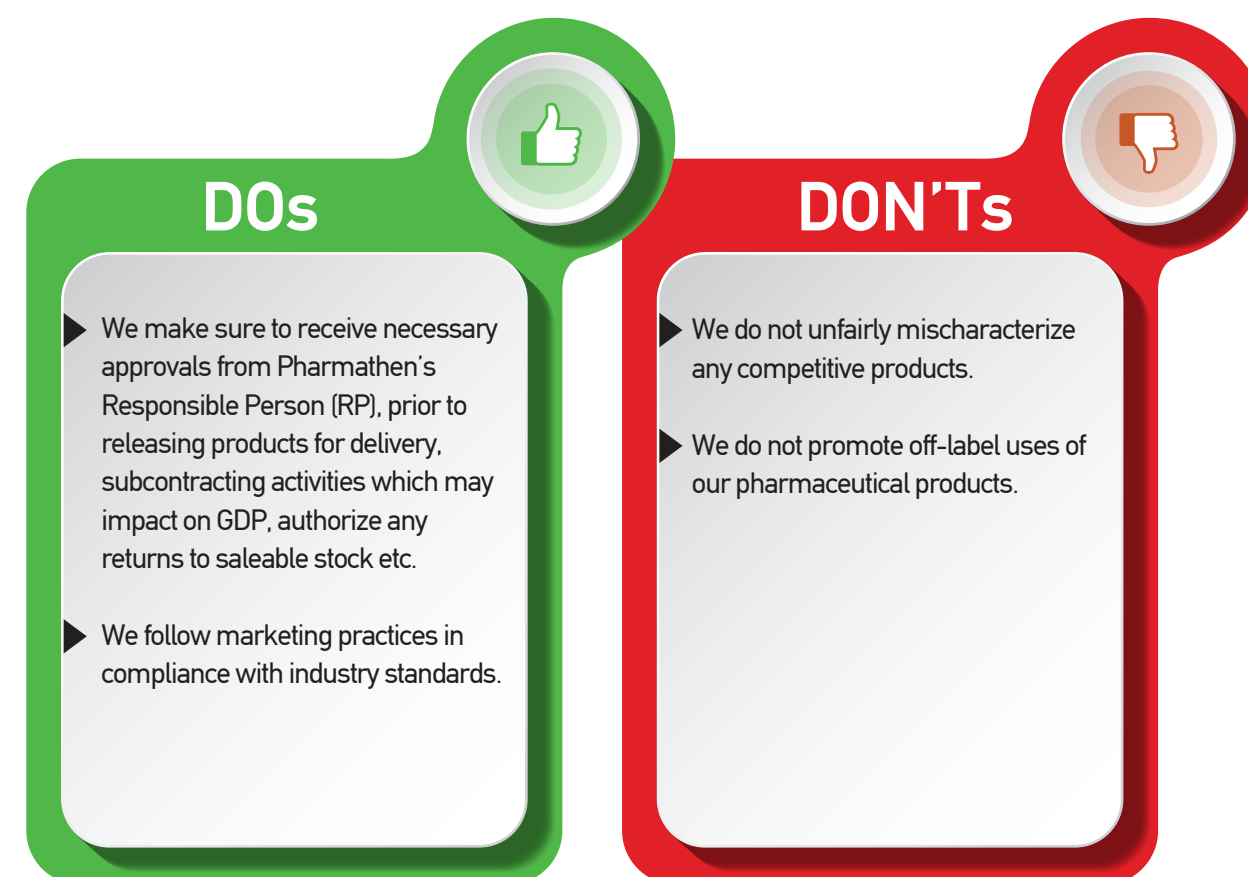
We constantly update our processes to make sure they meet with the strictest applicable criteria and require all third parties that form part of our distribution chain to abide by the same standards.

Indicatively:

- a. We ensure that we supply medicinal products, by wholesale, to entities which are themselves in possession of an EU wholesale distribution authorization or which are authorized or entitled to supply medicinal products to the public in accordance with applicable national laws.
- b. Deviations from established norms are well-documented and investigated while appropriate corrective and preventive measures are taken to avoid and correct such deviations, should they arise.

Marketing practices

Our marketing practices and overall communication with stakeholders is compliant with all applicable laws and best practices. Our promotional materials are consistent with the regulatory approvals of our products. The outer packaging and package leaflets never include elements of promotional nature.



Key definitions

Good Distribution Practice: GDP describes the minimum standards that a wholesale distributor must meet to ensure that the quality and integrity of medicines is maintained throughout the supply chain.



CORPORATE RESPONSIBILITY

To make a difference: that is what we strive for at Pharmathen.

We support people in need and change their everyday lives through small and large acts of giving. Since 1969, we have stayed committed to our goal: leaving a positive footprint on society and returning a part of our profits to the economy, the environment and our fellow citizens.

Translating our values into actions, we take initiatives to act, sponsor and donate to local communities and the public welfare. Through the years, we do make a difference and support pillars such as: healthcare, Culture, Sports and Education. We believe in the power of teamwork; we are the living proof that Corporate Responsibility starts from within an organization, thus, we take pride in our people who participate in actions and initiatives that make a difference and have a positive impact on society, the economy, the environment and themselves.

Our donations/ non-commercial sponsorships/ contributions:

- a. are made to duly registered non- profit and non-governmental organizations (NGOs) and the health care system;
- b. are documented and accounted for in the manner required by applicable laws and industry codes;
- c. are made for the right reasons and not within the frame of corruption or improper advantage ex. to unduly influence their recipients; they are mainly related to our industry's scope and targeted towards local communities we operate in or are made under the umbrella of synergies with other institutions and associations related to the pharmaceutical industry, the healthcare system and people's wellbeing;
- d. are never conditional upon the prescription or purchase of any Pharmathen product.

DOs

- ▶ If we have an idea with respect to a donation that mirrors Pharmathen's ethics and values, we make sure to share it with our Human Resources & Corporate Affairs Department.
- ▶ We do support any gesture of kindness and action as long as it is in tune with our values and our vision to make a difference in people's lives.

DON'Ts

- ▶ We don't make contributions that don't comply with our high integrity standards.
- ▶ We don't make donations to political parties.



ENVIRONMENTAL SAFETY & SUSTAINABILITY

At Pharmathen, we interact with the environment in a responsible manner, demonstrate environmental awareness and try to integrate sustainable practices each step of the way.

We are conscious of the effect corporate practices have on the environment, we consider our role in that effect and we self-regulate.

More specifically:

- a. we comply with all applicable national and European environmental laws and regulations;
- b. we maintain processes and/or other controls in order to guarantee the aforementioned compliance with any applicable operational and/or reporting requirements;
- c. we obtain any environmental permits/ licenses, as may be required, on a case by case basis, prior to proceeding in actions which affect the environment;
- d. we make best efforts to minimize the environmental impact of our activities/ products by taking measures such as upgrading actions in the context of carbon imprint, ensuring the responsible management of waste disposal etc.

Pharmathen does not neglect to engage with its suppliers, in order to promote environmental safety. We request our suppliers to commit to the same environmental principals Pharmathen does, as a minimum requirement for doing business with them.

DOs

- ▶ We support the implementation of environmental improvement opportunities.
- ▶ We acknowledge the importance of staying environmentally aware and consider the impact of our manufacturing activities on the environment.

DON'Ts

- ▶ We don't proceed in actions requiring permits or other authorizations without having the proper permits/ authorizations in hand.
- ▶ We try to reduce energy consumption and refrain from using it in a careless way.

CHAPTER 4

WHISTLE-BLOWING CHANNELS & NON-RETALIATION





One of the goals of the present CoC is to establish a **collective conscience** in the workplace.

Everyone is strongly encouraged to speak- up about any potential violation of the present CoC.

We are all accountable for upholding the CoC.

- a. If you have identified a violation of the CoC;
- b. If you have any questions with respect to its implementation;
- c. If you have doubts about whether or not there is a violation of the present CoC;

Please contact the compliance department (via email: compliance@pharmathen.com) or use other designated means of whistleblowing.

Dedicated channels are also available to report violations and address questions pertaining to the below subject- matters:

Labor law, performance, career development, harassment, bullying equal opportunities, discrimination: **Human Resources Division via the allocated Business Partner.**

Violation/queries regarding external communications: **Corporate Affairs.**

Pharmacovigilance	24/7 tel.: +30 210 6604300 (extension 9) e-mail: pharmacovigilance@pharmathen.com
Data protection	dpo@pharmathen.com

No form of retaliation shall be taken against any employee or other party bound by the principles of the present CoC, who, in good faith, reports or participates in the investigation of a possible violation of Pharmathen's CoC.

Anyone who retaliates against an employee for reporting or participating in an investigation, will be subject to disciplinary action, up to and including termination.

