

Code of Conduct of Bela-Pharm GmbH & Co. KG, Vechta, Germany

Preamble:

Bela-Pharm GmbH & Co. KG is a service provider in the area of contract manufacturing for the pharmaceutical and feed additives industries.

The prime objective of Bela-Pharm GmbH & Co. KG is the economic strength of the company, in order to be an enduring and reliable partner, not only for the customers, suppliers, creditors, employees and company owners, but also for the state and society, providing technical expertise, the highest level of process quality and maximum flexibility.

This code of conduct is conceived as a commitment and applies to all locations and business units of Bela-Pharm GmbH & Co. KG. Company staff is informed of the code of conduct in a suitable manner; they undertake to operate according to this code. Bela-Pharm GmbH & Co. KG also requires all business partners (e.g., suppliers, service providers, or customers) to behave in the same manner as described in this code.

Commitment

Bela-Pharm GmbH & Co. KG considers and respects the applicable laws and regulations of the countries in which it operates.

It also honours generally accepted international standards and ethical rules of behaviour, as requested e.g. in the UN "Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework" and thereby recognizes

- a. States' existing obligations to respect, protect and fulfil human rights and fundamental freedoms;
- b. The role of business enterprises as specialized organs of society performing specialized functions, required to comply with all applicable laws and to respect human rights;
- c. The need for rights and obligations to be matched to appropriate and effective remedies when breached.

This expressly includes, but is not restricted to, conduct in relation to:

- Fairness and honesty
- Confidentiality and secrecy
- Antitrust law
- Anti-Bribery and Anti-Corruption
- Human dignity and human rights
- International labour standards
- Health and safety at work
- Protection of the environment and conservation of resources
- Non-discrimination
- Freedom of opinion
- Prohibition of the Use of force and harassment
- Privacy
- Quality
- Due Diligence of Supply Chain

Bela-Pharm GmbH & Co. KG strives for a high level of safety in all its business areas and has standards and procedures in place to manage safety risks (incl. cyber safety risks).

• Fairness und honesty

We, the Bela-Pharm GmbH & Co. KG, act in accordance with the generally accepted business practices of fairness and honesty when communicating with our employees and business partners. We work with authorities in a spirit of trustful cooperation.

• Confidentiality and secrecy

Trade secrets of business partners are treated in confidence by the company and its employees. We comply with the German Trade Secrets Protection Act. The passing on of confidential information to third parties, or making it publicly available (including indirectly through the use of artificial intelligence), is forbidden. This applies to company staff even after termination of working relationships.

• Intellectual Property and Copyrights of others

We respect the proprietary and confidential information of others, just as we protect our own. This includes written materials, software, patents and other intellectual property and also applies to the use of artificial intelligence.

• Antitrust law

We undertake to engage in fair competition, respecting the antitrust law and other, competition regulating legislation. Unlawful agreements on prices or other conditions, sales territories or customers and the misuse of our own market power contravene our general principles.

• Anti-Bribery and Anti-Corruption

We reject bribery and corruption and also do not tolerate this type of behavior. Our employees have to ensure that no personal dependencies on customers or suppliers arise. As regards gifts and invitations that correspond to normal acts of courtesy, the requirement that these might reasonably be expected to have no influence on business decisions is strictly observed.

• Human dignity and human rights

Internationally recognized human rights are expressly and persistently supported. In the event of disciplinary measures, all company employees are to be treated with dignity and respect. The measures must be taken in accordance with applicable national and international standards.

• International labour standards

We reject child labour and any form of exploitation of children and adolescents and consider the relevant laws. We reject any form of forced labour, including forced labour in prisons and bonded labour. For this we warrant accepting the international labour standards of the International Labour Organization and notably the following fundamental conventions:

- Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87).
- Right to Organise and Collective Bargaining Convention, 1949 (No. 98).
- Forced Labour Convention, 1930 (No. 29).
- Abolition of Forced Labour Convention, 1957 (No. 105).
- Minimum Age Convention, 1973 (No. 138).
- Worst Forms of Child Labour Convention, 1999 (No. 182).
- Equal Remuneration Convention, 1951 (No. 100).
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111).

• Health and safety at work

In order to prevent accidents and injuries, the employer provides safe and healthy working conditions that fulfil, as minimum criteria, the applicable legal requirements.

• **Protection of the environment and conservation of resources**

We use environmentally friendly practices at all locations where we operate. We have implemented appropriate measures with regard to sustainable development notably in order to:

- Comply with all applicable laws and regulations relating to the environment and having effect in Germany.
- Limit the impact of our activities on the environment, including reducing the consumption of energy, natural resources and their waste resources, and controlling emissions and pollution of any kind as requested by German Law.
- Prevent and reduce environmental risks of our activities and products, including environmental health risks as requested by German Law.

• **Non-discrimination**

In all employment decisions, including - but not restricted to - engagements and promotions, remuneration, fringe benefits, training, redundancies and dismissals, all employees are treated strictly according to their abilities and qualifications.

• **Freedom of opinion**

The right to freedom of opinion and free expression is guaranteed. Bela-Pharm GmbH & Co. KG has an open corporate culture in which employees are encouraged to report errors and deviations without expecting reprisals.

• **Prohibition of the use of force and harassment**

Employees are not exposed to any form of physical chastisement or other physical, sexual, psychological or verbal harassment or abuses. Polite and respectful behavior toward all company employees and external stakeholders is expected at all times.

• **Privacy**

The privacy of all stakeholders, both internally and externally, is protected and the regulations of the European General Data Protection Regulation (GDPR) are complied with.


• **Quality**

We place a very high value on the quality of our service. We use appropriate management systems and apply them vigorously. For our pharmaceutical products we warrant the compliance with the relevant EU-GMP guidelines.

• **Due diligence of Supply Chain:**

We, Bela-Pharm GmbH & Co. KG, are aware of the consequences of our actions in the supply chain from origin to end (including for example traceability for the sources of raw materials to support legal and sustainable sourcing) and operate in accordance with the German Act on Corporate Due Diligence Obligations in Supply Chains as well as in accordance with the export and sanctions regulations applicable in Germany.

Vechta, 25.5.25



Dr. Stephan Bergmann, CEO
Bela-Pharm GmbH & Co. KG