

## Code of Conduct

### 2. Purpose

This Code of Conduct establishes Hovione's commitment to doing business in a responsible and ethical manner and defines Hovione's expectations for all Team Members and Authorized Third Parties (defined below) to conduct business with integrity, transparency, and respect for human rights.

### 3. Scope

All Team Members and Authorized Third Parties are required to understand and comply with this Code of Conduct in any activity undertaken by such Team Member or Authorized Third Party while carrying out any function at Hovione. It is the responsibility of each Team Member or Authorized Third Party to ensure, at a minimum, its own compliance as well as of his/her peers with this Code of Conduct while carrying out any action on behalf of Hovione.

Additionally, Hovione will strive to ensure that similar standards are met by our vendors and suppliers through the adherence to Hovione's Third Party Code of Conduct (defined below).

### 4. Definitions

- **"ABAC Laws"** means anti-bribery and anti-corruption laws applicable in the jurisdiction where Hovione does business. Examples of ABAC Laws include US Foreign Corrupt Practices Act and the UK Bribery Act.
- **"Authorized Third Parties"** means any person (i.e., individual natural person, sole proprietorship, partnership, limited partnership, limited liability partnership, corporation, limited liability company, business trust, joint stock company, trust, incorporated associated, joint venture or similar entity or organization, including a government or political subdivision, department or agency of a government) other than a Team Member authorized by Hovione to act on its behalf or in connection with Hovione's business.
- **"Hovione"** means Hovione Holding AG or any of its affiliates.

- **"Hovione Policy"** means any duly approved Hovione policy, including without limitation standard operating procedures, corporate operating procedures, Hovione Legal Rules and Hovione Business Rules.
- **"Hovione Third Party Code of Conduct"** means a code of conduct applicable to Hovione's supply chain and third-party vendors as may be approved by Hovione from time to time.
- **"ILO"** means the International Labour Organization.
- **"Speak-Up"** has the meaning set forth in Section 17 of this Code of Conduct.
- **"Team Member"** means any Hovione employee with an active employment agreement with a Hovione company.
- **"UNGP"** means the United Nations Guiding Principles on Business and Human Rights.

### 5. Human Rights and Labour

**5.1 Freely Chosen Employment** - Hovione shall not use forced, bonded or indentured labour or involuntary prison labour. Workers' original identification documents, travel documents, or any personal valuables are not kept by Hovione unless required by law. No worker shall pay for a job or be denied freedom of movement.

**5.2 Child Labour and Young Workers** - Hovione shall not use child labour. Children below the local minimum working age, the age of compulsory education or the ages set out in applicable ILO conventions (whichever is higher) shall not be employed.

**5.3 Non-Discrimination** - Hovione shall provide a workplace free from discrimination. There shall be no discrimination for reasons such as race, colour, age, pregnancy, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, marital status or any other protected category as defined by local laws. At Hovione we treat colleagues, customers and stakeholders with dignity and respect, and we promote inclusiveness as an inherent strength of our workforce.

## Code of Conduct

**5.4 Fair Treatment** - Hovione shall treat workers with dignity and respect and provide a workplace free of harassment, harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers and no threat of any such treatment.

**5.5 Wages, Benefits and Working Hours** - Hovione shall, at a minimum, pay workers according to applicable wage laws, including minimum wages, overtime hours, when applicable by law or contract, and mandated benefits. Hovione shall communicate with the worker the basis on which they are being compensated in a timely manner. Hovione is also expected to communicate with the worker whether overtime is required and the wages to be paid for such overtime. Overtime shall be consistent with applicable national and international standards.

**5.6 Freedom of Association** - Open communication and direct engagement with workers to resolve workplace and compensation issues are encouraged at Hovione and workers should understand how to raise issues if they wish. Hovione shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labour unions, seek representation and join workers' councils. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment. Where collective agreements are in place, they are communicated to all workers in a language they can understand.

**5.7 Compliance** - In accordance with the UNGPs, it is Hovione's responsibility to identify, assess, and address any potential human rights risks or impacts present in our operations and supply chains. We endorse the UNGPs' recommendation that companies of all sizes, sectors, and operational contexts conduct human rights due diligence. This proactive approach aims to prevent or mitigate risks to human rights linked to operations, products, or services through business relationships. Moreover, it encourages companies to participate in the remediation of human rights impacts they may cause or contribute to.

### 6. Health and Safety

**6.1 Worker Protection** - Hovione shall protect workers from over exposure to

chemical, biological, physical hazards and physically demanding tasks in the workplace and in any Hovione provided living quarters and shall establish reasonable and customary preventive measures to avoid physical or mental fatigue. Hovione shall ensure appropriate housekeeping and provide workers with access to potable water.

**6.2 Process Safety** - Hovione shall have management processes in place to identify the risks from chemical and biological processes and to prevent or respond to catastrophic release of chemical or biological agents. Hovione shall also have management processes in place to identify, prevent and mitigate the mechanical and electrical risks arising out of its operations.

**6.3 Emergency Preparedness and Response** - Hovione shall identify and assess emergency situations in the workplace and any Hovione provided living quarters, and to minimize their impact by implementing emergency plans and response procedures.

**6.4 Hazard Information** - Safety information relating to hazardous materials - including pharmaceutical compounds and pharmaceutical intermediate materials - shall be available to educate, train, and protect workers from hazards. Hazardous materials can include but are not limited to raw materials, isolated intermediates, products, solvents, cleaning agents and wastes.

### 7. Environment

**7.1 Environmental Authorizations and Reporting** - Hovione shall comply with all applicable environmental regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained, and their operational and reporting requirements followed.

**7.2 Waste and Emissions** - Hovione shall have systems in place to ensure the safe handling, movement, storage, disposal, recycling, reuse, or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment. This includes

## Code of Conduct

managing releases of active pharmaceuticals into the environment (PiE).

**7.3 Spills and Releases** - Hovione shall have systems in place to prevent and mitigate accidental spills and releases to the environment and to prevent adverse impacts on the local community and public health.

**7.4 Resource Use** - Hovione shall strive for sustainability and minimization of its environmental impact and take measures to improve efficiency, promote the use of sustainable practices and reduce the consumption of resources.

**7.5 Sustainable Sourcing and Traceability** - Hovione shall carry out due diligence on the source of critical raw materials to promote legal and sustainable sourcing.

### 8. Animal Welfare

Hovione's supply chain and third-party vendors are expected to comply with Hovione's Third Party Code of Conduct, all applicable laws regarding animal welfare standards and to reduce the use of animals for testing whenever possible.

### 9. Anti-Bribery and Corruption

All forms of bribery, corruption, extortion and embezzlement are prohibited. Hovione shall not pay or accept bribes or participate, directly or through the use of intermediaries, in other illegal inducements in business or government relationships. Hovione shall ensure it has adequate systems in place to prevent bribery and shall uphold the highest standards of professionalism and compliance with ABAC Laws. Sanctions for violating ABAC Laws are severe and may be applied not only to Hovione but also to a Team Member or Authorized Third Party (termination of employment or relationship by Hovione, fines by authorities and in the case of an individual may also lead to imprisonment).

### 10. Fair Competition

Hovione shall conduct their business consistent with fair and vigorous competition and in compliance with all applicable anti-trust laws, including without limitation,

in respect of practices which restrict competition or abuse a dominant position, and any form of collusion is strictly forbidden. Hovione shall employ fair business practices including accurate and truthful advertising.

### 11. Data Privacy and Security

Hovione shall safeguard and make only proper use of personal data (i.e. data relating to an identified or identifiable person) in compliance with applicable laws to ensure that the privacy rights of any Team Member, Authorized Third Party or any other person from whom Hovione processes personal data are protected. Hovione shall comply with applicable privacy and data protection laws and ensure the protection, security and lawful use of personal data.

### 12. Confidentiality and Intellectual Property

Hovione supports initiatives which are designed to protect intellectual property rights of Hovione, its customers and any other third party. Hovione is committed to respecting the intellectual property rights of third parties. All Team Members and Authorized Third Parties must take the intellectual property rights of third parties into due consideration in the performance of their tasks.

Additionally, Hovione must ensure that any confidential information received from third parties are kept safe, confidential and intact. This includes making sure data is protected from accidental, unauthorized, or unlawful loss, destruction, alteration, disclosure, use or access.

### 13. Responsible Minerals

Hovione is committed to upholding human rights and ensuring responsible sourcing practices as part of our social and environmental sustainability efforts. This includes engagement with principles and due diligence requirements to prevent the use of conflict minerals in our products and manufacturing processes. Our goal is to ensure that our sourcing practices do not contribute to human rights abuses, particularly in conflict-affected regions and other high-risk areas.

## Code of Conduct

### 14. Trade Sanctions and Export Controls

We are committed to full compliance with all applicable trade sanctions, export controls, and economic regulations in the countries where we operate. Hovione strictly adheres to national and international laws, including those imposed by the United Nations (UN), European Union (EU), United States (U.S.), and other relevant authorities. We prohibit any direct or indirect transactions with sanctioned entities, individuals, or countries unless explicitly authorized by applicable regulations.

### 15. Conflicts of Interest

Hovione shall take reasonable care to avoid and manage conflicts of interest. Team Members and Authorized Third Parties are expected to notify any conflict of interest with Hovione and Hovione is expected to notify all affected parties if an actual or potential conflict of interest arises.

### 16. Management Systems

**16.1 Commitment and Accountability** – Hovione shall ensure compliance with the concepts described in this document by allocating appropriate resources and identifying senior responsible personnel.

**16.2 Legal Requirements** – Hovione shall identify and comply with applicable laws, regulations and standards.

**16.3 Risk Management** – Hovione shall have mechanisms to determine and manage risks in all areas addressed by this Code of Conduct.

**16.4 Accurate Reporting (Financial and Non-Financial data)** – Team Members and Authorized Third Parties must ensure that any data, information or records which they create, or for which they are responsible, are, to the best of their knowledge, true and fair. Hovione must comply with applicable laws and external standards and ensure that the information it supplies to its auditors, customers and stakeholders as well as regulatory agencies and government bodies provides a

true and fair view of the relevant subject matter (financial, technical or other). Team Members and Authorized Third Parties must never make a false or misleading statement or entry in any report or record and hereby acknowledge that falsifying records and accounts or misrepresenting facts may constitute fraud.

**16.5 Training and Competency** - Hovione shall have a training program that achieves an appropriate level of knowledge, skills and abilities in management and workers to address the expectations in this Code of Conduct.

**16.6 Identification of Concerns** - All Team Members and Authorized Third Parties are encouraged to report concerns, illegal activities or breaches of this Code of Conduct in the workplace without threat of or actual reprisal, intimidation or harassment. Hovione shall investigate and take corrective action if needed.

**16.7 Communication** - Hovione shall have effective systems to communicate this Code of Conduct to all Team Members and Authorized Third Parties.

### 17. Speak Up

Hovione promotes a speak-up culture, which is endorsed by Hovione's management. Any violation or potential violation of this Code of Conduct can be reported by any Team Member or Authorized Third Party as well as by third parties via Hovione's 'speak up' portal at: <https://www.hovione.com/speak> or by emailing information to [report@seehearspeakup.co.uk](mailto:report@seehearspeakup.co.uk) ("Speak-Up"). The name of the reporting person, unless reported anonymously, and the information provided will be treated confidentially. In cases where it is found that an actual infringement of this Code of Conduct has occurred, we will implement effective measures to interrupt any such violation and withdraw Hovione from any activity contributing to any such violations. Any communication made in the context of Speak-Up is otherwise subject to Hovione's Global Grievance and Speak Up Policy.