PHARMING

PHARMING VÝROBNÍ, a.s.



CODE OF CONDUCT

Dear Colleagues and Business Partners,

PHARMING VÝROBNÍ, a.s. can look back on nearly 130 years of history characterized by continuity and a strong entrepreneurial spirit. Today, PHARMING VÝROBNÍ, a.s. is one of the leading suppliers of packaging made from solid and corrugated cardboard. Our services include the complete process from structural design to the production and delivery of finished packaging.

We cooperate with companies from various industries, such as the pharmaceutical, cosmetics, food, automotive, and consumer goods industries, not only within the Czech Republic. Our clear objective is to strengthen and further consolidate this position. In conducting our business, we must appropriately consider the associated risks.

Within our business activities, lawful and responsible conduct by company management, executives, and every employee is crucial for future success. PHARMING VÝROBNÍ, a.s. is aware of its role in society and its responsibility towards customers, business partners, and employees. The company has therefore committed itself to adhering to clearly defined principles and expects the same from its business partners.

Our shared values are responsibility, vision, passion, uniqueness, and solutions, which also shape our corporate culture. These values form the foundation for a cooperative and productive working environment as well as for the continued successful development of our company. They guide us in our mutual cooperation and serve as the benchmark for our daily conduct.

This Code of Conduct is a binding document for all employees of PHARMING VÝROBNÍ, a.s. without exception and summarizes the principles intended to ensure that our business activities comply with internal and external requirements. These requirements include laws, directives, agreements, and other voluntary commitments. Their purpose is also to motivate our employees towards responsibility and help them navigate these requirements.

Among other things, the Code includes the goals and principles of the business direction of PHARMING VÝROBNÍ, a.s. The principles established in our Code of Conduct also reflect our understanding of values and apply to all our facilities. Compliance with the principles set out in the Code of Conduct protects the company and every employee from avoidable risks and strengthens our reputation among customers and business partners.

Ing. Václav Klomínek
Chairman of the Board of Directors



INTRODUCTION

“We comply with the law and act in accordance with the Code of Conduct.”

We trust in the lawful and responsible conduct of our employees. The Code of Conduct contains the most important principles of conduct in economic, social, and environmental areas with which you, as employees of PHARMING VÝROBNÍ, a.s., must be familiar. These principles will help guide you and provide assurance that you are behaving correctly in a professional environment.

Some principles set out in the Code of Conduct may be regulated by other regulations. Key topics within the Code of Conduct may in the future be supplemented by more detailed explanations or may already be subject to existing partial regulations. The Code of Conduct summarizes and clarifies them but does not replace these regulations. In particular, those provisions defining stricter requirements than the Code of Conduct are binding.

The Code of Conduct also directs our business partners toward ensuring compliance of internal and external requirements with our business activities. Our decision whether to order services from a business partner on a one-time or repeated basis will depend on whether the business partner complies with the Code of Conduct or at least with an equivalent code of its own company or subcontractor.

The Code of Conduct is binding for all employees of PHARMING VÝROBNÍ, a.s., regardless of whether the company is based domestically or abroad. This Code of Conduct forms the basis for further company regulations that may take into account the specifics of a given industry and country. The Code also applies to internal company matters.

The management of PHARMING VÝROBNÍ, a.s. may decide on further clarification of the generally applicable principles established in the Code of Conduct.

Under no circumstances does this Code of Conduct create any claims by third parties against PHARMING VÝROBNÍ, a.s. and its employees. Legal relationships with these parties are governed by the relevant statutory or contractual provisions.

For readability purposes only, employees are not gender-specific in the following text. All references to persons should be understood as gender-neutral. Unless expressly stated otherwise, the term “employees” also includes executive directors and other managers.





HUMAN RIGHTS AND SOCIAL

"We comply with labor law conditions and respect human rights."

Mutual Respect and Equal Treatment

At all facilities of PHARMING VÝROBNÍ, a.s., we are committed to mutual recognition and respect both within our company and in relation to our business partners and other stakeholders.

We respect the personal rights of our colleagues. Under no circumstances do we tolerate any form of discrimination, harassment, or insults.

Our corporate values and this Code of Conduct, which we are committed to following, serve as guidance, a decision-making aid, and instructions for responsible conduct in the business environment. All employees must know and comply with applicable legal regulations and internal rules of conduct. We place the same requirements on our business partners.

Respect for Human Rights

We comply with the prohibition of discrimination enshrined in the European Convention on Human Rights and the Charter of Fundamental Rights of the European Union, i.e., we do not disadvantage any employees or other persons, particularly on the grounds of gender, ethnic or social origin, sexual orientation, skin color, culture, religion, ideology, appearance or physical constitution, political opinions, age, or health condition.

Respect for human rights and compliance with all labor regulations and provisions are essential principles of our management philosophy. We reject all forms of child labor, forced labor, compulsory labor, modern slavery, and human trafficking. In each country, we comply with minimum age regulations for employment.

Compliance with Labor Regulations

We are committed to fair working conditions. Our employees are remunerated in accordance with wage policy provisions (or collective agreements) and labor markets in which we operate, taking into account minimum wages, overtime regulations, and other supplements in accordance with applicable national law. The same applies to working hours and social benefits.

Employment relationships are entered into voluntarily. Employees have the right to terminate employment with reasonable notice. PHARMING VÝROBNÍ, a.s. applies the principle of equal

opportunities. People with the same professional and personal qualifications are entitled to equal treatment in recruitment, working conditions, training, and personnel development.

Freedom of Assembly and Collective Bargaining

We support the right to freedom of assembly and collective bargaining while respecting relevant legal conditions. Close and trustworthy cooperation with employee representatives is an essential part of our company management. Employees must be able to openly discuss working conditions with company management without fear of disadvantage.

Operational Safety and Health Protection

Every manager is obliged to thoroughly instruct employees regarding occupational health and safety. Every employee is obliged to comply with these regulations and report potential risks and any breaches of safety rules to the responsible contact persons.
Occupational health and safety regulations apply at all workplaces of PHARMING VÝROBNÍ, a.s.

Ensuring workplace safety is one of the company's most important tasks. To minimize the risk of accidents, occupational illnesses, and other possible negative impacts, the company applies an internal safety policy in addition to all applicable legal provisions concerning occupational health and safety and accident prevention regulations.

We also expect our suppliers, service providers, and other business partners to comply with applicable occupational health and safety laws and to require the same from their subcontractors.





COMPLIANCE WITH LAWS AND RIGHTS

"We are committed to complying with all applicable laws and regulations."

We conduct all business matters so that they are always in compliance with applicable laws, statutory provisions, and contractual obligations both domestically and abroad. For successful cooperation, it is essential that the principles described in this Code of Conduct and applicable laws and regulations are binding throughout the entire supply chain.

Anti-Corruption and Anti-Bribery

We do not tolerate corruption in the form of unlawful favors in any form. We expect the same from our suppliers, service providers, and other business partners.

No gifts may be provided to authorities or public officials, even if they have only low economic value. These bodies must maintain their independence. Reasonable hospitality for public officials during meetings or negotiations remains permissible if allowed by law.

Gifts and Hospitality

Personal gifts, invitations, benefits, or other advantages for state-owned enterprises or other private-sector business partners are permitted as "courtesies within business relationships" provided they do not violate criminal law or other regulations and are not of disproportionate value.

Benefits must be transparent; otherwise, they may create the impression of bribery or undue advantage. Payments to employees or representatives of domestic or foreign companies and persons closely associated with them are not acceptable. Gifts are sent exclusively to business addresses; we do not send gifts to private addresses.

It is also prohibited to accept unlawful benefits or bribes. As employees of PHARMING VÝROBNÍ, a.s., we may accept courtesies such as gifts (but not cash) or invitations intended to maintain business relationships from suppliers and service providers, provided they are appropriate to the occasion and reasonable in scope. In case of doubt, we consult the relevant supervisor.

Charity and Sponsorship

As a company, we are aware of our responsibility toward society and therefore support regional goals and development. We provide financial and material donations, i.e., voluntary donations without entitlement to consideration, or sponsorship contributions based on contractually agreed consideration,

for nonprofit and charitable purposes such as education, research, science, art, culture, sports, and social care.

Sponsorships and donations are provided transparently and in accordance with applicable laws, local regulations, and internal rules to prevent corruption.

It should be emphasized that no donations or other benefits may be provided to representatives of public authorities or political parties or organizations.

Fair Competition and Compliance with Antitrust and Competition Laws

As a globally operating company, we always conduct ourselves in accordance with the principles of fair and free competition and comply with relevant competition and antitrust laws at both national and international levels.

Under no circumstances do we participate in anti-competitive or unfair business practices. Secret agreements with competitors concerning sales prices, terms, customers, supply territories, development strategies, products, etc., are prohibited.

Boycotting customers or suppliers through illegal ties or refusal to conclude business transactions is rejected.

Compliance with Tax, Customs, and Foreign Trade Regulations

As an internationally operating company, we comply with all tax regulations domestically and abroad.

The same applies to all applicable foreign trade and customs regulations, sanctions, embargoes, or other laws and regulations relating to the import, export, or domestic trade of goods, services, technologies, software, or capital movements.

Transactions or business dealings with persons or companies listed on sanctions lists are generally prohibited.

Product Compliance and Safety

Our products and services, as well as our development and production processes, are state-of-the-art and comply with applicable customer requirements, standards, legal regulations, and official provisions relating to safety, reliability, and quality.

Our suppliers and business partners are also obliged to implement appropriate measures in their development and manufacturing processes to ensure that products and services comply with legal requirements and standards and to minimize the risk of counterfeit parts or materials entering our supply chain.

Prevention of Conflicts of Interest

At PHARMING VÝROBNÍ, a.s., we make all business decisions exclusively in the company's best interests. We strictly separate private interests from company interests and do not use business activities to gain personal advantages.

Personal relationships and interests do not influence our professional activities. We make decisions based on facts and objectivity.

If conflicts of interest arise with private interests or other economic activities, they must be transparently disclosed and resolved in accordance with the law and applicable guidelines.

Secondary Activities

We do not work for third parties during working hours. Secondary activities of any kind must be reported to the management of PHARMING VÝROBNÍ, a.s.. The same applies if employees operate a company or hold an interest in a company that is wholly or partially in a competitive or business relationship with PHARMING VÝROBNÍ, a.s.

Before accepting secondary employment or a managerial or executive position in another organization, approval from the company management must be obtained. Approval must also be requested when awarding contracts to companies in which we ourselves, any of our relatives, or another person closely associated with us holds an interest.

Ethical, Safe, and Responsible Procurement

Our suppliers and service providers are selected according to appropriate and transparent criteria. Internal guidelines and procedures must always be followed when awarding public contracts. We do not enter into contracts with the company's business partners for private purposes.

We also expect our suppliers, subcontractors, service providers, and other business partners to comply with applicable laws and regulations relating to quality and environmental protection.

Any supplier known to act contrary to this Code of Conduct or our supplier guidelines will be excluded from the selection process.

When purchasing and sourcing raw materials, including conflict minerals, any unlawful or ethically unacceptable methods of procurement must be avoided. Likewise, applicable environmental protection regulations must be strictly observed during procurement processes.

For chemical substances subject to registration, evaluation, and authorization under Regulation (EC) No. 1907/2006 of the European Parliament and of the Council, the supplier must ensure that information regarding the registration status in the supplier profile on the supplier portal is complete and up to date.

Protection of Intellectual Property of PHARMING VÝROBNÍ, a.s. and Our Business Partners

For the success of PHARMING VÝROBNÍ, a.s., it is essential to handle company property and the property of our business partners carefully, responsibly, and in accordance with established rules. Property includes both tangible assets and intangible assets such as business information, know-how, industrial property rights, trade secrets, inventions, and patents.

We use the company's tangible and intangible assets exclusively in accordance with the law and for company purposes. Unauthorized use, modification, processing, disclosure, destruction, or misuse of company property may result in employment-related, civil, and criminal liability.

In order to protect the data and information of PHARMING VÝROBNÍ, a.s. and our business partners, our IT systems and the provided stationary and mobile equipment must only be used in compliance with IT security guidelines. IT security policies must be followed without exception.

We also expect the same level of protection of company property from our suppliers and service providers.



DATA AND INFORMATION PROTECTION

"We comply with data protection regulations and handle data and information responsibly."

Proper Communication and Public Conduct

Information is one of the most important assets of PHARMING VÝROBNÍ, a.s.. The quality of information processing, transmission, and security is a key factor in maintaining business operations. We comply with internal principles of careful and consistent communication. We communicate with our employees, colleagues, customers, suppliers, and other stakeholders respectfully and clearly.

We respect the right to freedom of expression; however, we are aware that we may be perceived as representatives of PHARMING VÝROBNÍ, a.s. even in our private lives, and we therefore strive to maintain the company's good reputation. When expressing private opinions, we ensure that such personal statements are not associated with a specific position within PHARMING VÝROBNÍ, a.s.

External communication (public relations or PR), i.e., the publication, dissemination, or exchange of information and news with the media, industry experts, other companies, and the public through all available channels (online media, print media, television, radio, social media, interviews, speeches, etc.), may only be carried out by an authorized spokesperson for public and media relations after approval by the company management.

Confidentiality, Data Protection, and Information Security

Confidentiality

Confidential operational information of PHARMING VÝROBNÍ, a.s. and our business partners that is made available to us is always kept confidential and protected against unauthorized access by third parties.

We maintain confidentiality regarding all confidential matters, documents, and information — including, in particular, technical details of products and processes — both during the term of employment and after its termination. We do not disclose such information to third parties unless required to do so by law or pursuant to a court or official order. In this context, third parties also include our relatives, persons closely associated with us, or employees of PHARMING VÝROBNÍ, a.s. who are not authorized to access such information.

Data Protection

We regard data protection as a personal right. We therefore handle personal data with particular care. Personal data is collected, used, stored, and processed only in accordance with applicable legal requirements.

Information Security

The business activities of PHARMING VÝROBNÍ, a.s. depend to a large extent on the availability and functionality of information systems. The security and integrity of all information and data are therefore of fundamental importance to us.

We protect sensitive data and information relating to our employees, customers, suppliers, and other business partners against unauthorized access. For this purpose, our IT systems incorporate various state-of-the-art security measures and protection concepts.

Copying software and installing private software on company hardware are strictly prohibited.

The use of IT systems and equipment for unlawful, fraudulent, immoral, or harassing purposes or activities is prohibited. In particular, searching for, downloading, or distributing data and information containing racist, pornographic, unconstitutional, violent, or propagandistic content is strictly prohibited.

We handle IT systems, information, and data exclusively in accordance with IT security principles, taking into account all data protection regulations and internal IT security policies.

Managers are obliged to inform employees about this internal security policy and its observance already during the recruitment process.

Our suppliers and service providers are also obliged to maintain confidentiality and comply with all data protection regulations and laws.

Transparent Accounting and Proper Financial Reporting

The credibility of PHARMING VÝROBNÍ, a.s. is based on the accuracy of our financial statements, and we strictly comply with all relevant regulations in this regard. We also consistently adhere to applicable financial reporting regulations and cooperate with external auditing bodies and authorities.

Employees who, as part of their duties, record, maintain, or transmit accounting or financial data are responsible for ensuring the accuracy and truthfulness of financial records, data, information, and books.

We reject any circumvention of controls through false or misleading entries of data or accounting records.



ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

"We ensure compliance with environmental legislation and are committed to implementing sustainability-oriented measures."

Sustainable Environmental and Climate Protection

Sustainable environmental and climate protection are important corporate objectives for PHARMING VÝROBNÍ, a.s.. During production, we actively take ecological aspects into account and, through appropriate production processes, seek to prevent negative environmental impacts as far as possible.

Energy saving and emission reduction are key priorities in both development and production. PHARMING VÝROBNÍ, a.s. follows the requirements of the environmental management system DIN EN ISO 14001.

Employees and suppliers of PHARMING VÝROBNÍ, a.s. must comply with environmental protection laws and regulations and energy management requirements in the country in which they operate. In production processes, natural resources must be used in a responsible and sustainable manner. In carrying out our activities, we comply with all company policies and legal requirements relating to the

Production processes, as well as supplied products or services, must comply with applicable legal and regulatory environmental requirements. Suppliers are also required to implement appropriate recycling and disposal concepts for their products.



SCOPE OF APPLICATION AND CONTACTS

“We ensure that doubts and risks are openly communicated.”

Scope of Application

We strive to act considerately and fairly towards our employees and our business partners and to conduct our global business in compliance with applicable laws.

These principles of conduct arise from our values, our objectives, and our corporate philosophy and apply to all employees and managers of PHARMING VÝROBNÍ, a.s.. Every employee is responsible for complying with and actively supporting the principles set out in our Code of Conduct.

Managers play an important role by leading through example in complying with the Code of Conduct. They must ensure that their employees receive the Code of Conduct and fully understand it.

We also expect our suppliers, service providers, and other business partners to be familiar with the Code of Conduct and to comply with its principles.

Zero-Tolerance Policy

Measures that are not in compliance with the Code of Conduct may result in employment-related, civil, and criminal penalties for individual employees.

We are aware that violations of the Code of Conduct may also have serious consequences for PHARMING VÝROBNÍ, a.s. as a whole. Violations of competition law, antitrust law, and anti-corruption laws may pose a threat to the continued existence of the company.
Conduct that is contrary to the principles defined herein will therefore not be tolerated under any circumstances.

The zero-tolerance policy also applies to other **unlawful, immoral, or unsafe behavior or working practices, as well as discrimination, bullying, and any form of harassment, violence, threats of violence, coercion, or aggression.**

Likewise, retaliation against anyone who raises concerns, reports misconduct, or expresses suspicion will not be tolerated under any circumstances.

Whistleblower Principles

We promote a culture of open and honest communication and encourage employees and other stakeholders to report and raise any legal or ethical misconduct without fear of retaliation. Regardless of the form in which concerns are submitted, all reports must be taken seriously. Reports must be promptly reviewed by the responsible team.

Based on the results of the review, an appropriate course of action must be determined in accordance with applicable legal regulations and the Code of Conduct. During internal investigations, we expect full cooperation and truthful statements from all employees. All persons involved in the investigation are obliged to maintain confidentiality.

PHARMING VÝROBNÍ, a.s. prohibits any form of retaliation against anyone who, in good faith and for justified reasons, raises concerns or participates in internal investigations related to suspected violations of the Code of Conduct, the law, or any other internal regulation.

This applies regardless of whether the reported case is ultimately substantiated or not. Likewise, we do not tolerate any attempts to discourage or prevent any person from reporting concerns or asking questions. However, we also note that the anti-retaliation policy must not in any way prevent legitimate employment-related decisions within PHARMING VÝROBNÍ, a.s., provided that such decisions are not of a retaliatory nature. This policy must not be misused in any way. Dishonest reports or knowingly false statements will be subject to disciplinary measures, which may lead up to termination of employment.

Our company is built on respect for compliance with legal regulations and on high ethical and moral standards. Unlawful or unethical conduct is not tolerated and is unacceptable to us. In order to effectively prevent and detect such conduct, employees and contractual partners have been informed of the possibility to contact company management electronically (via e-mail) or in writing to report suspected unlawful conduct they have become aware of in connection with their work or other related activities.

Every report is taken seriously and carefully reviewed. Each case is assessed objectively and individually according to its specific circumstances. Reporters are informed of the outcome of the assessment whenever possible.

Our reporting mechanisms ensure protection of all whistleblowers against retaliation, discrimination, or other adverse treatment, as well as confidentiality of information and impartial handling of reports.

Unrestricted reporting channels may be used to report human rights risks as well as environmental risks, as well as violations of applicable laws and internal regulations related to the business activities of PHARMING VÝROBNÍ, a.s.

The responsible person for receiving and handling reports at the PHARMING VÝROBNÍ, a.s. facilities in Zahrady and Varnsdorf is:

Valentina Nožičková
Tel.: +420 412 336 554
Mobile: +420 702 154 792
E-mail: nozickova@pharming.cz

You will receive an initial response to your report within 7 days. A statement regarding your report will then be provided within 30 days.

Notice

Reports may also be submitted anonymously. Based on the circumstances and the information available at the time of reporting, the reporter should have reasonable grounds to believe that the facts being reported are authentic and truthful. It is therefore not permitted to knowingly submit false information.

Such conduct may be subject to sanctions in accordance with applicable law.

