

## **Code of Ethics Pharm-In, spol. s r.o.**

This Code of Ethics of Pharm-In, spol. s r. o. (hereinafter referred to as the “Code”), with its registered office at CBC V Karadžičova 16, 821 08 Bratislava, Company ID No.: 44 186 436 (hereinafter also referred to as “Pharm-In”, the “Company” or the “Employer”), has been prepared in accordance with the applicable legislation of the Slovak Republic and in alignment with best practices applied in the context of responsible and ethical business conduct. It is based on ethical principles of business and behavior within the sector in which the Company operates, and reflects relevant rules and standards, such as those contained in the Code of Ethics of the Association of Innovative Pharmaceutical Industry.

The Company does not support any conduct which, although technically within the bounds of the law, would be considered unethical. This Code sets out the principles and conditions of ethical business conduct to which the Company is committed. It covers areas including core values, ethics, human rights, labor rights, occupational health and safety, and environmental responsibility. It is intended as a practical guide for addressing ethical dilemmas and maintaining integrity in everyday decision-making and business operations.

### **Article I**

#### **Personal Scope of Application**

1. The provisions of this Code apply to all employees of Pharm-In, as well as to individuals elected or appointed to governing bodies of the Company, even if they do not have a formal employment relationship with the Company.
2. This Code is also a standard annex to contracts entered into with suppliers and is binding upon them. Furthermore, where feasible, the Company actively promotes ethical principles and requires its suppliers to ensure that third parties engaged by them also adhere to these same principles.

### **Article II**

#### **Company Principles**

1. *Fair Competition*
  - 1.1 Pharm-In conducts its business in accordance with fair competition and the applicable legislation of the Slovak Republic, and expects the same standard from its suppliers and other third parties.
2. *Quality and Good Commercial Practice*
  - 2.1 The services offered by Pharm-In to its clients are provided under a valid trade license and registration with the Commercial Register of the Slovak Republic. The Company ensures its business activities comply with Slovak legislation, internationally recognized standards relevant to its sector, and client requirements.
  - 2.2 All processes are subject to monitoring and revision as needed.
  - 2.3 Process audits may be conducted upon request of the client, in accordance with the terms of the relevant contractual agreement.
  - 2.4 The supplier selection process, as described in the Company’s SOP “Supplier Selection,” ensures that the quality and safety of services provided to the client are not compromised, and that the integrity of the supply network is maintained.

3. *Trade Sanctions and Export Controls*

- 3.1 Pharm-In avoids entering into contractual relationships with individuals or entities listed on sanctions lists.
- 3.2 Pharm-In also requires its suppliers and third parties not to engage in contractual relationships with sanctioned individuals or entities.

4. *Data and Information Protection*

- 4.1 Data and information processed by Pharm-In in the course of its business activities are protected in compliance with the applicable laws of the Slovak Republic. Detailed guidance on data protection and retention is set forth in the Company's Directive on Personal Data Protection and the Security Guidelines for Personal Data Processing.

5. *Fundamental Human Rights*

- 5.1 Pharm-In conducts its operations in a manner that respects the human rights and dignity of all individuals. Business activities are carried out within the Slovak Republic in compliance with the Constitution of the Slovak Republic, local laws, and internationally recognized principles, including the United Nations Guiding Principles on Business and Human Rights.
- 5.2 Pharm-In expects all third parties with whom it contracts to respect these fundamental human rights.
- 5.3 The Company's activities do not cause, contribute to, or have any adverse impact on fundamental human rights.
- 5.4 If any employee or third party becomes aware of a violation of these principles, they are required to act in accordance with Article III of this Code.

6. *Labor Rights – Fair Employment*

- 6.1 The labor rights of all employees of Pharm-In, s.r.o. are respected. The Company treats its employees with dignity, fairness, and equality, ensuring equal opportunities for all.
- 6.2 Employees, as well as third parties, are fairly compensated for their work. The Company complies with the applicable legislation of the Slovak Republic in matters of remuneration. Employment conditions, along with employees' rights and obligations, are further defined in the Company's Internal Labor Regulations and individual employment contracts. The remuneration of third parties is governed by the respective contractual agreements, duly executed and signed by both parties.
- 6.3 The Company and its employees respect the personal privacy of colleagues and treat everyone with courtesy, regardless of race, skin color, nationality, origin, gender, sexual identity, religion or belief, political opinion, age, physical condition or appearance.
- 6.4 The Company strictly prohibits any form of discrimination. Employees and third parties shall not be discriminated against on the basis of gender, religion or belief, race, national or ethnic origin, disability, age, sexual orientation, marital or family status, skin color, language, political or other opinion, national or social origin, property, birth, or other status, or due to whistleblowing or reporting criminal or socially harmful conduct.

7. *Creating a Positive Work Environment*

- 7.1 The Company promotes healthy interpersonal relationships, collaboration, and the development of a working environment founded on mutual respect, trust, and cooperation.
- 7.2 It appreciates when employees contribute to a workplace culture built on trust, transparency, and open communication.
- 7.3 The Company places importance on employees sharing its vision and strategic direction and acting in accordance with its values and objectives.
- 7.4 The Company and its employees strive to foster good working relationships, encourage cooperation, treat all individuals with respect, honor human dignity, uphold the principle of equal treatment, and help build a healthy and safe work environment.

- 7.5 The Company emphasizes open and constructive communication and encourages employees to address concerns in accordance with internal policies, see Article III.
- 7.6 The Company does not tolerate any conduct that may disrupt team spirit, undermine mutual trust among colleagues, or damage the Company's reputation. The dissemination of unverified information, creation of internal conflict, or defamation of colleagues is considered a serious violation of workplace discipline.

#### 8. *Occupational Health and Safety*

- 8.1 The Company complies with the applicable legislation of the Slovak Republic regarding occupational health and safety. It ensures regular training in workplace safety and fire protection for its employees. Trainings are conducted upon onboarding and repeated at regular intervals.
- 8.2 Likewise, the Company requires its suppliers and third parties to ensure compliance with relevant occupational health and safety legislation in their practices.

#### 9. *Zero Tolerance Toward Corruption*

- 9.1 Pharm-In, s.r.o. rejects all forms of corruption—direct and indirect—and enforces a policy of zero tolerance against corrupt conduct. Accordingly, the Company requires honesty, transparency, and fairness from its employees in the performance of their professional duties. These same expectations apply to all third parties entering into contractual relationships with the Company.
- 9.2 The Company expressly prohibits any form of corruption, particularly through the giving or receiving of unlawful payments—monetary or otherwise—with the intent to obtain an undue advantage in dealings with persons affiliated with the Company. Such unlawful advantages may be conferred directly or via intermediaries, for personal benefit or the benefit of others, including by requesting or accepting promises of bribes to act or refrain from acting in breach of duties arising from one's employment, profession, position, or function.
- 9.3 Employees and other persons who are contractually or legally bound to the Company are obligated to report any breach or suspected breach of this Code of Ethics—particularly suspected acts of corruption or other misconduct—to the designated officer responsible for receiving and analyzing such reports. This officer shall take all necessary steps to clarify the matter. Reports may be submitted via email to [ethics@pharmin.sk](mailto:ethics@pharmin.sk) or via voice message to the phone number 0918 509 431.

#### 10. *Bribery*

- 10.1 Pharm-In strictly prohibits any form of bribery, including the acceptance or offering of unlawful payments—financial or otherwise—aimed at securing advantages in interactions with persons connected to the Company. Such acts include the offering or acceptance of benefits either directly or through intermediaries, for oneself or another person, in the form of requesting or accepting promises of a bribe to act or abstain from acting in a manner that breaches professional or contractual obligations. Upon any promise, offer, or solicitation of a bribe, Company employees must report the incident without undue delay to the designated person in accordance with Article III of this Code.

#### 11. *Political Contributions*

- 11.1 The Company requires that any person authorized to act on its behalf refrain from applying pressure—direct or indirect—on political actors and does not fund political parties, their representatives, or candidates, whether domestic or foreign, nor sponsor events intended solely for political propaganda purposes.

## 12. Charitable Contributions and Sponsorship

12.1 Pharm-In may, via sponsorship or specific agreements, support initiatives in social welfare, environmental protection, culture, sports, or education. Such support must be executed through events of guaranteed quality, purpose, and effectiveness. The Company devotes particular attention to the proposal selection process, which is documented in writing, including any potential conflicts of interest—personal or corporate. In all cases, Pharm-In must not expect or seek any reciprocal benefit in exchange for its support.

## 13. Incentives and Benefits

13.1 Employees and other stakeholders of the Company must not offer or accept—directly or indirectly—payments, rewards, or any form of benefit intended to expedite services or secure preferential treatment for another person. In the event of a promise, offer, or solicitation of any such benefit, Company employees or other individuals with decision-making influence must report the matter without delay in accordance with Article III of this Code.

## 14. Gifts and Other Courtesies

14.1 Any gift exceeding customary business practices or ethical standards—typically exceeding €50 excluding VAT—or intended to influence preferential treatment in favor of Pharm-In is strictly prohibited. Gifts must not influence business judgment or give rise to the appearance of such influence. The term “gift” includes any form of benefit (e.g. conference attendance without registration fees, job offers, etc.).

14.2 It is specifically prohibited to offer any gifts to representatives of public authorities (especially healthcare professionals), either in Slovakia or abroad, and to their family members. Likewise, gifts to auditors that may compromise their independence or serve to obtain any advantage are strictly forbidden.

14.3 No exceptions apply to these rules, even in countries where high-value gifts are customary in business dealings, regardless of whether the gift is promised, offered, or received.

14.4 Promotional items (e.g., pens, diaries, USB drives) provided by Pharm-In to business partners must be of insignificant value and are considered brand-related goodwill.

14.5 All gifts—excluding symbolic-value items—must be reported and recorded in the Register of Received and Provided Gifts, maintained by the Office Manager, and approved by the Company’s General Manager.

14.6 Employees who receive promotional items or benefits that exceed insignificant value must report this immediately to General Manager, who shall assess the appropriateness and document the decision in writing. Reporting under points 14.5 and 14.6 must be done via the “Gift and/or Hospitality Disclosure Form,” found in Annex 1 of this Code of Ethics.

14.7 Insignificant gifts must not be accepted frequently, repeatedly, or regularly.

14.8 For the purposes of point 14.7 of this Code:

- Repeatedly means the same person provides a gift more than once in a calendar year.
- Regularly means the gift is given repeatedly at identical time intervals (e.g., daily, weekly, monthly).
- Frequently means the same person provides gifts irregularly but repeatedly.

14.9 Each Head employee is responsible for monitoring compliance with the obligations under this section of the Code. Where violations or suspicions arise, the Head employee must act in accordance with Article III of this Code.

## 15. Conflict of Interest

15.1 A conflict of interest is a situation that carries the risk that a personal interest might influence—or appear to influence—the Company’s business interests. An existing conflict of interest can create the perception of improper conduct and threaten trust in Pharm-In, s.r.o. For this reason, all potential conflicts of interest must be identified and effectively addressed.

15.2 All employees are obligated to report any potential conflict of interest encountered in the course of their professional activities by completing the “Conflict of Interest Disclosure Form” and submitting it to the Employer, who will determine the appropriate course of action. The form is attached as Annex 2 to this Code of Ethics.

#### **16. Anti-Money Laundering**

16.1 Pharm-In explicitly rejects any activities associated with money laundering or terrorist financing. The Company fully complies with international standards, European Union regulations, Slovak national legislation, and all applicable secondary legal provisions in this field.

#### **17. Environmental Sustainability**

17.1 Pharm-In is committed to protecting the environment. The Company actively seeks to minimize its environmental impact through initiatives such as waste separation, reduced paper usage, implementation of electronic invoicing, and reduction in plastic consumption.

17.2 Third parties are expected to adhere to the same environmental standards. Pharm-In encourages all employees, suppliers, and other external partners to contribute to environmental stewardship both in the workplace and at home.

### **Article III Reporting Violations of the Code of Ethics**

1. Pharm-In expects all employees to conduct themselves in accordance with the principles outlined in this Code. Any violation constitutes a breach of work discipline, and the Company will take appropriate action under applicable law regardless of the employee’s position or role.
2. If Pharm-In incurs damage resulting from a breach of this Code, it shall seek compensation from the responsible employee in accordance with the Labour Code of the Slovak Republic.
3. If employees or other contractually or legally bound individuals become aware, in the course of their professional duties, of any violation of the provisions of this Code—or any other socially harmful activity—they must report such violation or suspected violation (particularly in cases of suspected corruption) to the designated Ethics Officer. This officer is responsible for receiving and analyzing the report and taking all necessary steps to investigate the matter. Reports may be submitted via email to: [ethics@pharmin.sk](mailto:ethics@pharmin.sk) or via voice message to: 0918 509 431.
4. Reports may be submitted anonymously or with identification.
5. Pharm-In is committed to ensuring the highest possible level of confidentiality and anonymity for employees who report concerns in good faith. Such individuals will not be penalized, threatened, or otherwise retaliated against—even if the report ultimately proves to be unfounded.
6. All reports of Code violations and other socially harmful conduct will be properly documented and archived in accordance with the Company’s internal regulations.
7. The procedure for reporting violations of the Code and other socially harmful activities is further described in Employer Directive No. 1 governing the internal system for reviewing such reports.

### **Article IV Ethics and Compliance Training**

1. All employees and individuals elected or appointed to the governing bodies of Pharm-In, regardless of whether they have an employment relationship with the Company, must complete annual training covering the topics addressed in this Code.
2. Completion of this training must be recorded in the employee’s education file.
3. The Office Manager is responsible for preparing and conducting the training.
4. All new employees must complete the training no later than three months after commencing employment.

## **Article V**

### **Final Provisions**

1. This Code is binding for all employees of Pharm-In, as well as any individuals elected or appointed to Company governing bodies, regardless of the existence of an employment relationship. It is also binding for suppliers and other third parties affiliated with the Company.
2. This Code shall enter into effect on the date it is signed by the Company's General Manager.
3. Upon the effective date of this Code, all previous Codes or policies related to ethics and responsible business conduct shall be revoked.
4. The Code is regularly updated, particularly following changes to relevant legislation. Pharm-In is committed to continuously improving its ethical conduct and views this document as dynamic and evolving.
5. This Code is governed primarily by the provisions of Constitutional Act No. 460/1992 Coll. – the Constitution of the Slovak Republic, Act No. 54/2019 Coll. on the protection of whistleblowers and related legislation, Act No. 124/2006 Coll. on occupational health and safety, and other binding Slovak laws. The provisions of this Code also respect applicable EU regulations and internationally recognized standards. All employees subject to this Code must act in accordance with binding legal provisions as well as widely accepted ethical and moral principles upheld by the Company.
6. The areas covered by this Code are subject to regular risk analysis, the results of which help shape its content.
7. The Office Manager is responsible for monitoring compliance with this Code.
8. Failure to comply with the provisions of this Code shall be deemed a breach of work discipline and may result in termination of employment or cancellation of contractual relationships with suppliers or other third parties.