



Code of Conduct

Aenova Group

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Statement from the management



The Aenova Group is a leading contract manufacturer and development service provider for the pharmaceutical and healthcare industries worldwide. We produce medicinal products and in some cases life-saving medicines as well as nutritional supplements for the health and well-being of patients and animals around the world. Patients are able to live longer, healthier and better lives thanks to the medicines produced by Aenova.

This important responsibility requires us to work by a set of rules that provides a framework for professional, everyday decisions. A set of rules based on integrity, respect, transparency and honesty: our Aenova Code of Conduct.

As one of the largest CDMOs in the world, we are aware of our pivotal role in the healthcare industry every day. We take pride in delivering products and services to our healthcare customers with the highest level of quality, cost-efficiency, reliability and timeliness. Excellence, continuous improvement and reliability are deeply anchored in our processes. We believe that providing quality in products also requires good governance. It is a matter of course for us that we also comply with the legal requirements placed on the industry arising from national and international laws and regulations as well as internal rules in compliance with ethical principles. In a nutshell: we comply with these rules.

The Aenova Code of Conduct briefly summarises the most important rules that apply to us. It's our guideline for how to behave in dealings with customers, suppliers, other business partners, and especially with employees. It provides us with a directional framework on how to implement and live up to our values during our everyday work. In this way, the Code of Conduct serves as a guideline for our actions and how we treat our employees.

“

Excellence
beyond
Manufacturing

”

Our Aenova motto means we value quality and compliance with regulations, as well as appreciation and reliability about how we treat one another. Because that's how we earn the trust that makes us successful!

Jan Kengelbach (CEO) and Ralf Schuler (CFO)

Our commitment as Aenova



We act based on respect, transparency and honesty. Adhering to the relevant laws and internal rules (compliance) is self-evident for us. Here at Aenova, we are aware of our responsibility as an employer, a client and a contractor. Aenova condemns the violation of Human Rights. We strongly oppose any form of forced or child labour and modern-day slavery. As part of this responsibility, we actively shape how the rules of the German Supply Chain Law (Lieferkettensorgfaltspflichten-gesetz (LkSG)) are implemented for our products with our customers and suppliers.

On the following pages, we demonstrate our commitment in selected topics:

All aspects in view? – Self-check for making decisions

Our commitment

We check every one of our actions to ensure integrity.

Why this is important to us

Not every single action can and should be regulated by guidelines. Instead, each of us should rely on our own internal sense of what is right and wrong. We can often trust that feeling in our decisions.

Behavioural examples

- › We ask ourselves the following when making decisions and taking action:
 - Is it ethical and lawful?
 - Is it in line with the Code of Conduct and our company values?
 - Could I tell my family or a third party about it with no problem?
- › If we answer 'no' to at least one question, we consult with the compliance team and, in case of doubt, we refrain from the decision or action.

Anti-bribery and anti-corruption

Our commitment

We do not tolerate any form of bribery or corruption.

We will not give, offer or promise anything of tangible or intangible value, nor will we accept, solicit or agree to any such action to improperly influence decisions. We will also not use third parties to commit bribery or corruption.

Why this is important to us

To improve patient care, we must fight corruption. Corruption results in patients not receiving care with an adequate level of quantity and quality and at a reasonable price.

Corruption undermines trust in companies and governments, reduces access to public services (e.g. health and education) and hinders innovation.

Behavioural examples

- › We do not promise or give benefits to public officials to influence decisions, for example, in the context of approvals and audits – in any country.
- › We do not pay facilitation payments to expedite approvals, inspections or handling of goods – in any country.
- › We support charitable causes with donations and accept sponsorships without the intention of influencing others. For this reason, recipients that have a background in politics are not included in our programmes.
- › We use good judgment when accepting and offering business lunches, small tokens of appreciation or promotional gifts.

B

Business continuity management

Our commitment

We are a reliable partner – especially in times of crisis.

Our business continuity management strengthens us for the special challenges so that we can continue to supply our customers, and care for these patients even during crises.

Why this is important to us

Crises are part of everyday business life. Business continuity management helps us to identify risks before a crisis and to take countermeasures in good time.

This makes us responsive and able to act.

Behavioural examples

- › We identify the risks relevant to us and take appropriate countermeasures.
- › We combine countermeasures and emergency plans to form the business continuity management plan.
- › The security of supply of 'life-saving products' is particularly important to us.

Corporate social responsibility (CSR)

Our commitment

We are aware of our social responsibility as a company and actively embrace it. With this in mind, our actions are guided by the UN Sustainable Development Goals, and we continuously invest in relevant certificates, e.g. ISO 45001 (occupational health and safety management), ISO 14001 (environmental management) and ISO 50001 (energy management). Also, the Aenova Group's CSR performance is regularly reviewed by EcoVadis.

Why this is important to us

As part of society, we want to contribute to a liveable present and future.

Behavioural examples

PEOPLE

- › Aenova is committed to social initiatives related to the company's operations and the local environment of our production sites.
- › The importance of value-based behaviour is reflected in our performance management system.
- › We assume social responsibility by educating young people.

PLANET

- › We are driving forward energy-efficiency projects.
- › We reduce the impact that our business operations have on the environment, for example in the context of the carbon footprint or possible pharmaceutical residues in waste water.

PROFIT

- › We are committed to fair competition and are against corruption.

D

Data protection and IT security

Our commitment

We protect our data and those of our business partners.
We provide IT security.

Why this is important to us

Data is a valuable asset. This applies to our business partners' data as well as our own. We are particularly sensitive in dealing with personal and technical data from our own company, as well as those of our business partners.

Responsible data handling and technical security help us to uphold the trust of our stakeholders (employees, patients, customers, healthcare professionals and society).

Behavioural examples

- › We secure our Personal Computer against unauthorised use, even if we only leave the workplace for a short time.
- › We check when we need to destroy stored data.
- › We use security tools in our IT infrastructure.
- › We train our employees on the subject of data privacy and IT security.
- › We only allow data access via appropriate authorisation structures.
- › We use information sparingly. Sensitive information such as regulatory documents or dossiers are only shared on a 'need-to-know' basis.
- › When we store data, we ensure integrity, confidentiality and availability through an appropriate authorisation and data storage concept.

Diversity and respect

Our commitment

We respect our employees along with all their different backgrounds and lifestyles. We act without prejudice and respect human rights and individual freedoms.

Why this is important to us

Diversity is an important component of any successful team. We value the diversity of our colleagues. Each individual brings his different skills to the table and so, together, we are more successful. This is only possible if we treat each other with respect. The same applies to how we treat our business partners.

Behavioural examples

- › We create a diverse working environment and do not allow discrimination based on nationality, gender, age, ethnicity, religion, sexual orientation or disability. Neither do we tolerate any form of harassment or bullying.
- › We hire only employees who have reached the prescribed minimum age.
- › Our employees all have the same opportunities for development and advancement, regardless of their gender, origin, age or sexual orientation. We respect the legal minimum wages and comply with nationally applicable labour laws.
- › All employees have a right to freedom of association and to have their interests represented by their elected representatives.

C

Confidentiality

Our commitment

Confidential information is treated as such.

Why this is important to us

Information is a valuable asset. There is information that should not be made available to the general public or may only be used for very specific purposes (see also data protection). Our customers provide us with their expertise in terms of product manufacturing – we protect this information in their interest.

Behavioural examples

- › We treat our own confidential information just as sensitively as that of our business partners.
- › We enter into mutual confidentiality agreements with both customers and suppliers.
- › We treat patents and sensitive third-party information as confidential.
- › The obligation to maintain confidentiality shall also apply after the employment relationship has been terminated.

M

Money laundering

Our commitment

We protect our company against money laundering and work only with regulated, traceable means of payment.

Why this is important to us

Money laundering harms us all because 'dirty' money stems from criminal activity. We do not support anyone in putting such money into circulation.

Behavioural examples

- › We always ensure that we do business with integer contractors.
- › We screen our contractors before we enter into any kind of business with them.
- › We do not use unusual or unregulated payment methods (for example, cryptocurrency).
- › We do not accept cash payments from our customers and we do not pay our standard suppliers with cash either.



Good manufacturing practice (GMP)

Our commitment

We provide our customers with quality products for the benefit of patients.
That is our top priority.

Why this is important to us

We are one of the world's leading contract manufacturers and development service providers for the pharmaceutical and healthcare industries. We can only maintain this hard-earned position if our products are safe and meet the highest quality standards for the benefit of the patients.

Behavioural examples

- › Compliance with legal requirements (such as those from the EU GMP and US FDA) is the basis of our processes.
- › We demonstrate our high quality standards, among others, through certified quality management and IFS and BRC certificates.
- › We provide regular training for our employees.
- › We are constantly improving. In this way, we continuously modernise our technology and optimise our processes.

C

Conflicts of interest

Our commitment

We ensure that our business judgement is not influenced by personal interests.

Why this is important to us

When private and business interests come into conflict, it can give the impression that professional decisions have been influenced or even 'bought'. These kinds of conflicts of interest can lead to decisions that are not objectively comprehensible. Sometimes a conflict of interest is even the prelude to fraudulent actions.

We strengthen the trust of our stakeholders by making clean decisions far away from personal 'cronyism'.

Behavioural examples

- › We separate private and business matters. If private and business interests overlap, we will look for an appropriate solution.
- › If services are used by business partners associated with us, these have standard market conditions.

Antitrust and competition law

Our commitment

We participate in fair competition and compete only by the quality of our service.

We do not engage in agreements or actions that violate competitive agreements.

Why this is important to us

Competition is a driver for innovation and leads to a wider choice of high-quality products at fair prices for the benefit of patients and society.

Behavioural examples

- › We do not exchange information on products, prices, cost structures, profit margins or territories with our competitors at trade shows or other meetings.
- › We do not submit fictitious proposal on RFPs to support territory or customer splits.
- › If we are unsure whether our conduct complies with antitrust laws, we seek advice from our legal and/or compliance team at an early stage.

S

Supply chain

Our commitment

We select business partners of integrity in the supply chain according to objective criteria.

We expect reliability and responsibility throughout our process chain. This explicitly includes responsibility for people and nature: Aenova strongly condemns the violation of human rights and any form of forced or child labour and modern slavery – also among our business partners.

Why this is important to us

Our success and continued corporate survival depend on the trust our customers and the public place in us and our supply chain. We can only deliver on our quality promises by working with strong partners of integrity.

Behavioural examples

- › We review our suppliers continuously during our cooperation with them.
- › We do not enter into contracts with suppliers that have not passed our compliance review.
- › We also have our own Supplier Code of Conduct, which we use in our company.

O

Occupational health and safety

Our commitment

It's our employees that make the Aenova Group. **That's why we take great care to provide a safe and healthy workplace.**

Why this is important to us

We are successful as a company when our employees can give their best. We enable high performance by creating good working conditions for all our employees.

Behavioural examples

- › We minimise safety risks in the workplace.
- › We support health in the workplace, e.g. through noise protection, height-adjustable desks, healthy meals in the in-house canteens.
- › We make an important contribution to combating health risks, for example by offering flu vaccinations or company medical examinations.

Handling company property

Our commitment

We respect property.

This applies equally to Aenova property as well as to that of third parties.

Why this is important to us

Ownership comes with certain obligations – for owners as well as for users. We protect property rights. This applies to tangible items (e.g. work equipment) as well as intangible items (e.g. data – see also data protection and confidentiality, technical information, rights to products or processes).

Behavioural examples

- › Work equipment is used for operational purposes and, in particular, is not used for illegal purposes or purposes that would be damaging to reputation.
- › We handle goods provided or goods delivered by our customers under reservation of title with the utmost care.
- › We do not use insider knowledge or information that is not freely available about our customers, their products or how they work for private securities transactions.

C

Customs and trade regulations

Our commitment

Aenova meets customer needs in many countries. **This is done in compliance with the respective customs, tax, and trade requirements as well as other applicable legal regulations** (e.g. for narcotics and medicines laws).

Why this is important to us

In extreme cases, violations of the requirements can lead to criminal and civil law consequences. Customers would not receive our products (on time) – and, as a result, patient care would be jeopardised.

Behavioural examples

- › We strictly adhere to customs and tax regulations.
- › We do not violate embargoes and economic sanctions.
- › Imports and exports are handled in accordance with the regulations.

Aenova – we take responsibility



We are all personally responsible for complying with our Aenova Code of Conduct and our internal policies and laws. Our managers serve as role models in this regard: Through leadership, setting an active positive example and working towards compliance, they help us get better every day – together.

If we are unsure about a situation, we seek advice from the relevant compliance function or another competent body at an early stage.

Violations of this Code of Conduct and related policies and laws may result in disciplinary action, up to and including termination of employment. Damages and criminal claims may be added. In many cases, we are required by law to do so. Criminal claims are made by the state, so neither Aenova nor its employees have any influence over this.

Taking responsibility also means that we take indications of possible misconduct and violations of our Code of Conduct, internal policies and laws seriously. These kinds of notifications can be reported via our SpeakUp channels (see intranet and home page for details).

This Code of Conduct was approved by the management on 31 December 2021. It also applies in all Aenova subsidiaries with effect from 1 January 2022. It applies to all business units and employees of the Aenova Group and replaces the Code of Conduct of 1 March 2018.



CARE. COMPLY.



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