



PHARMACEUTICAL WORKS POLPHARMA S.A.

Pelplińska 19, 83-200 Starogard Gdański

POLPHARMA GROUP CODE OF ETHICS

Document approved by Resolution of the Management Board	X/12/26
Effective from	01.02.2026
Last update	20.01.2026
Internal No	PPH/10/0

Table of Contents

Introduction	1
About Polpharma Group	2
About the Code	3
Abbreviations and Definitions.....	3
Roles and Responsibilities.....	4
General Provisions	5
Basic Ethical Principles	6
Rules of Conduct in Interpersonal Relations.....	7
Rules of Conduct in Business Relations and with Social Environment	9
How to Act in Case of Doubts	12
Reporting Violations of Law and Prohibited Acts	13
Final Provisions	13
Related Documents.....	13
Document History Review	14

Introduction

We are a dynamic organisation operating in a constantly changing environment. We know that our operations address essential social needs and that our products impact patients' health and quality of life, and we fully recognize the responsibility that comes with it. Our knowledge and experience are dedicated to everyone who relies on our products and we understand that trust in the quality of our work is essential.

We are aware that business and economic goals must go hand in hand with ethical values and principles. As Polpharma Group, we have travelled a long path of growth and transformation. The attitudes, experience, and commitment of our employees remain the foundation of our corporate culture. This legacy deserves respect and obliges us to uphold the highest ethical standards. Our

mission “We help people live a healthy life in a healthy world” defines our social role and unites all Employees, regardless of their position, location or seniority.

The Code of Ethics shapes Polpharma Group’s reputation as a socially responsible organisation that cares for the needs of its community. It is designed to inspire pride, security, and a sense of belonging among all individuals associated with Polpharma Group. The declaration of ethical conduct included in the Code motivates us and shapes all our decisions.

It is not a closed set of rules, but an evolving framework, adaptable to changing times and open to emerging values and contemporary challenges, e.g. of technological, social, or environmental nature. At the same time, it remains a clear expression of our special responsibility as a group operating in the pharmaceutical market.

We strive to have a positive impact on our surroundings and stakeholders, seeking relationships built on mutual respect and adherence to the highest legal and ethical standards. For all our stakeholders, including patients and business partners, the Code is both a guarantee of our honest, socially responsible conduct and a source of inspiration, reflecting our commitment to the environment and society, in line with our mission.

About Polpharma Group

Polpharma Group’s history began in 1935, when pharmacist Kurt Boskamp founded the Polpharma Polish Chemical and Pharmaceutical Plant in Starogard Gdański.

After World War II, the factory was nationalised and, in 1959, incorporated into the Polfa Pharmaceutical Industry Union. In 1995, the company reclaimed its historic name, “Polpharma”, and in 2000, its privatization marked the beginning of a period of dynamic growth.

Today, thanks to the dedication of thousands of employees, Zakłady Farmaceutyczne Polpharma S.A. is a leading company in the Polish pharmaceutical market and an international pharmaceutical group operating in the markets of Central and Eastern Europe, the Caucasus, and Central Asia. Our portfolio goes beyond medicines and active substances – we also produce dietary supplements, foods for special medical purposes, medical devices, and cosmetics.

We implement innovative solutions in all areas of our operations, using world-class technologies and the highest manufacturing standards. We are committed to advancing science, promoting health education, and supporting disease prevention. Patients, healthcare professionals, and business partners place their trust in us.

Our greatest strength lies in the commitment of all persons working with and for Polpharma Group across all the markets where we operate. We create an environment for them to thrive and achieve intended goals for the benefit of themselves, the Group, and its surroundings.

About the Code

What the Code is about

1. The Code:
 - a. establishes the fundamental ethical principles of Polpharma Group;
 - b. defines the standards of conduct expected from all Employees, in both internal and external relationships;
 - c. emphasises the role of management as ethical role models;
 - d. offers guidance for ethically questionable situations.

Purpose of the Code

2. The purpose of the Code is to:
 - a. establish a consistent compliance framework applicable to all Polpharma Group Companies;
 - b. provide proactive risk governance, enabling real-time identification of changes in national and international legislation and timely response to regulatory risks;
 - c. promote ethical growth and support informed decision-making with legal, ethical, and reputational consideration;
 - d. ensure that Zakłady Farmaceutyczne Polpharma S.A. complies with ISO 37001 and aspire to align these practices across all Polpharma Group Companies.

Scope of application

3. The Code is addressed to all Polpharma Group Companies and their Employees.
4. Other persons, companies, and organisations, when cooperating with Polpharma Group Companies, are expected to respect the rules of the Code and to conduct their business honestly and in compliance with the law.
5. If there is a difference between this Code and local laws or regulations applicable to a specific Polpharma Group Company, the more restrictive provisions shall apply.

Abbreviations and Definitions

Chief Compliance Officer	The person performing a global compliance function and acting as a Local Compliance Function for Zakłady Farmaceutyczne Polpharma S.A. in accordance with the Global Compliance System Policy.
Code	This Polpharma Group Code of Ethics.

Counterparty	A legal person or a natural person, regardless of whether they conduct business activity, in particular a contractor, supplier, customer, or any other entity entering into a relationship with a Polpharma Group Company, irrespective of the legal form of cooperation adopted.
Employee	A person employed by a Polpharma Group Company under an employment contract, a temporary employee, also an associate (i.e. a person providing services on a continuous basis under a civil law contract), or an apprentice, trainee, or volunteer.
Local Compliance Function	The person responsible for compliance in a specific Polpharma Group Company in accordance with the Global Compliance System Policy.
Local HR Function	The person responsible for human resources management in a specific Polpharma Group Company (Head of Culture and Communication for Zakłady Farmaceutyczne Polpharma S.A.).
Local Management Board	The governing body of a specific Polpharma Group Company, which may be referred to as a management board or have a different name, or in some cases may consist of a single individual.
Management Board of Zakłady Farmaceutyczne Polpharma S.A.	The management board that performs a global function for all Polpharma Group Companies and a local function for Zakłady Farmaceutyczne Polpharma S.A.
Management Staff	All persons to whom at least one Employee reports.
Polpharma Group (Companies), "we"	Zakłady Farmaceutyczne Polpharma S.A. and affiliates of Zakłady Farmaceutyczne Polpharma S.A.

Roles and Responsibilities

6. The **Management Board of Zakłady Farmaceutyczne Polpharma S.A.** and the **Local Management Boards** are responsible for approving and endorsing the Code of Ethics, ensuring its implementation across all Polpharma Group Companies, and promoting ethical values and principles.
7. The **Chief Compliance Officer** ensures that the Code is maintained and updated in line with legal requirements and best market practices, as well as provides high-level guidance on ethical issues.
8. The **Local Compliance Function** is responsible for implementing the rules described in the Code, monitoring adherence to the Code within their respective Polpharma Group Company, and supporting Employees in applying the rules and clarifying any doubts.
9. **Management Staff** should serve as a good example and be a role model for their subordinates. Management Staff is particularly responsible for:
 - a. creating good conditions enabling their subordinates to achieve their objectives and tasks that foster building a work culture based on ethical values and principles;

- b. promoting the standards and principles of conduct set out in the Code in everyday professional practice through conversations with Employees and Counterparties and by paying attention to ethical issues at work;
 - c. ensuring that all Employees have the opportunity to become familiar with the content of the Code;
 - d. providing, within the area of competence, all necessary explanations or advice related to resolving ethical dilemmas reported by Employees;
 - e. reacting to any behaviour that could result in negative consequences for both Polpharma Group as a whole and for individuals or entities cooperating with Polpharma Group;
 - f. providing support to Employees who raise ethical concerns and for protecting them against retaliation by individuals who act unethically.
10. **Employees** are responsible for familiarising themselves with the Code and adhering to the ethical values and principles in their daily work. Polpharma Group Companies have the right to impose consequences on Employees who violate the provisions of the Code.

General Provisions

11. Polpharma Group's mission is "We help people live a healthy life in a healthy world". It is based on ethical principles shaped by the personal and professional attitudes of people creating Polpharma Group over the years and by the values relied upon when pursuing business goals.
12. As individuals to whom the Code of Ethics applies, Employees should:
- a. comply with the national law of the country in which they operate;
 - b. act in compliance with the standards defined in the Code of Ethics in both internal and external relations;
 - c. follow company policies;
 - d. take guidance from Polpharma Group's values and assess their work in line with them;
 - e. feel responsible for the natural environment in which they live and work;
 - f. actively counteract unacceptable behaviour in the workplace;
 - g. react whenever they notice behaviour contrary to the law or ethical principles adopted at Polpharma Group, including by reporting such behaviours;
 - h. in justified cases, propose solutions to improve the Code of Ethics or support the development of Polpharma Group's ethical culture.

Basic Ethical Principles

13. Basic ethical principles define Polpharma Group's identity and constitute the company's DNA. Based on these principles, Polpharma Group builds its organisational culture and creates values that enable the achievement of business goals while upholding ethical standards.

Respect

14. At Polpharma Group, the human being is the most important. We treat people and their work with respect, regardless of their position. We apply this principle in our relationships with those who work with us, cooperate with us, as well as with people who use our products.
15. We aim to create a work environment characterised by respect for diversity and the dignity of all individuals, free from discrimination and other unethical behaviour. We want our workplace to foster the development of Employees and enable them to pursue their professional and personal ambitions.
16. We respect the right to privacy and to maintaining a balance between private and professional life.

Integrity

17. Strict compliance with the law is the foundation of Polpharma Group's credibility and reputation. Employees in all countries where Polpharma Group operates are required to be familiar with and comply with applicable laws.
18. For Polpharma Group, integrity also means acting in accordance with accepted ethical principles and good practices. This is reflected in the way we communicate and compete on the market, as well as in honest and reliable advertising and promotion of our products.

Solidarity

19. Solidarity with another human being is the foundation of understanding our work as service and commitment.
20. Polpharma Group offers help and support to people who are ill or suffering. We strive to constantly improve our therapeutic solutions in accordance with the highest standards of the pharmaceutical market.

Responsibility

21. We feel responsible for our workplace and the quality of the tasks we perform, knowing that our work affects the health and well-being of many people.
22. Polpharma Group pays particular attention to the safety and quality of its products. We feel responsible for ensuring constant availability of the products we manufacture, especially life-saving medicines.
23. We fulfil our obligations with diligence and commitment. By honouring them, as well as respecting trade secrets and confidential information, we form a credible and trustworthy organisation.
24. We take care of our assets and protect them from excessive risk.

Cooperation

25. Polpharma Group values teamwork based on knowledge and diverse competences of all Employees and Counterparties, which is why we appreciate the daily commitment of every individual.
26. We build our position by benefiting from the experience of Employees and their openness to new ideas that serve as the foundation for our innovativeness.
27. Open communication and dialogue are important at Polpharma Group. Our goal is to constructively seek agreement and build partnerships. Employees should support each other and strive to achieve common goals.
28. Cooperation between people, teams, and all Polpharma Group Companies is the reason for Polpharma Group's success on the market. It also enables the reinforcement of mutually beneficial relations with business and social partners.

Rules of Conduct in Interpersonal Relations

We offer equal chances for promotion, professional development, and rewarding

29. Polpharma Group ensures working conditions that foster the development and professional satisfaction of Employees. We motivate people to act and create space for the development of talents and abilities.
30. We establish remuneration and bonus systems based on objective criteria. Team managers carefully and reliably evaluate the work based on matter-of-fact and substantive criteria.
31. We value professionalism, experience, and work results. Career paths depend solely on the specific Polpharma Group Company's needs, work results, and commitment to the performance of assigned tasks. Opportunities for professional development are discussed. We also provide access to internal programmes designed to enhance knowledge and skills in line with the values and requirements of individual positions.
32. We aspire to apply transparent pay practices and equal opportunity principles for all Employees.

We respect human dignity

33. Polpharma Group is committed to respecting human rights in accordance with international conventions.
34. We do not accept:
 - a. violation of people's dignity, including irreverent, discriminating, or offensive behaviour that infringes on personal rights;
 - b. any action involving harassment or intimidation aimed at lowering self-esteem or causing isolation or exclusion from the team.
35. We protect and do not publish private information of individuals that we cooperate with.

36. We respect the freedom of association.

We appreciate diversity

37. Polpharma Group's culture involves openness to everyone, regardless of their gender, age, ethnic origin, nationality, religion, sexual orientation, appearance, health, physical capabilities, or any other aspect of diversity among Employees.

38. Regardless of differences, we respect one another and adhere to the principles of courtesy. We perceive diversity as a strength. In everyday operations, we draw on the rich and varied experience of all Employees and Counterparties.

39. We show respect for the views of others because we believe that diversity of opinions drives our growth and helps us overcome challenges. The key to achieving this lies in open dialogue and the exchange of knowledge.

We act and communicate honestly

40. We act with honesty, adhere to good practices, and communicate in a professional manner that supports our reputation. We do not resort to unethical practices such as deception, understatement, or deliberate misrepresentation.

41. We communicate our decisions transparently and openly discuss the results we achieve. We provide information regarding expectations and assigned tasks.

42. We share knowledge in a way that fosters the creation of partnership-based and understanding-oriented relations in teams. We value cooperation and mutual support in achieving planned objectives, for the benefit of Polpharma Group and its environment.

We ensure safe and healthy working conditions

43. The safety of work and the protection of Employees' health are very important to Polpharma Group. We comply with the laws and regulations related to workplace safety and health protection and actively work to improve working conditions beyond legal requirements in this area.

44. We shape awareness and encourage Employees to exercise caution at work, including by warning against situations that may threaten their health or lives.

We care for good reputation

45. Guided by mutual respect and trust, Polpharma Group respects Employees' right to privacy. At the same time, Employees should be mindful of the impact of their behaviour outside work on Polpharma Group's image and reputation.

46. In relations with the environment, Employees should:

- a. protect Polpharma Group's good name and reputation,
- b. respect Polpharma Group's brand and values,
- c. follow the rules on online and media communication set out in the Global Policy – Netiquette.

Rules of Conduct in Business Relations and with Social Environment

We keep our commitments

47. Polpharma Group makes every effort to fulfil undertaken commitments. Out of concern for customer safety and to maintain fair relations with Counterparties, we do not make promises that cannot be kept.

We protect Polpharma Group's assets

48. Polpharma Group cares for professional integrity. We are responsible for the proper use of Polpharma Group's assets and for preventing their waste or misuse.
49. Company assets include, among others, fixed assets and other movables, legally protected information, trademarks and other intangible assets, as well as all funds and financial resources. Another important asset is working time, which Employees are obliged to use efficiently.
50. Polpharma Group's assets are intended solely for the proper performance of duties by those who work in or cooperate with Polpharma Group. They should not be used for private purposes in any way that is inconsistent with applicable policies.

We are transparent

51. Polpharma Group takes a strict approach to respecting the law and ensuring compliance.
52. We document our business transactions and other accounting operations in an accurate and transparent manner. We report financial results and undergo audits by independent auditors.

We prevent and do not tolerate fraud

53. Polpharma Group actively prevents and does not tolerate any form of fraud, including falsification of documents, misrepresentation of information, misappropriation of assets, or any other deceptive practices.
54. Employees are required to promptly report any suspected or actual fraudulent activity through the designated reporting channels and to fully cooperate with internal audits, investigations, and monitoring processes designed to detect and prevent fraud.

We avoid conflicts of interest

55. In situations where personal, family, or other conflicting interests are contrary to the interests of Polpharma Group, Employees should withdraw from any action or decision affected by the conflict of interest.

We do not offer or accept undue benefits

56. We do not compromise Polpharma Group's reputation by offering or giving undue benefits in order to establish or maintain business relationships, or to politicians, public officials, auditors, or other persons to influence their official decisions.

57. We do not offer healthcare professionals any benefits beyond what is legally permitted. Our promotional and advertising activities directed at healthcare professionals comply with applicable law, remain symbolic, and follow accepted practice. Remuneration offered to healthcare professionals for provision of services permitted by law must correspond to their qualifications, the work performed and the fair market value principle. Detailed rules are described in the Marketing Activities Instruction (locally adopted).
58. Employees may accept business gifts only if permitted by applicable law and custom, provided they are occasional or promotional and do not create any obligation or influence decisions or actions. The permissible value of gifts and the procedure for handling them are described in the Anti-Corruption Code (locally adopted).
59. We also avoid actions that, while not formally illegal, could be negatively perceived by society, provoke an adverse reaction from the recipient, or otherwise harm Polpharma Group's reputation.

We adhere to the principles of hospitality

60. Polpharma Group makes every effort to ensure that offered hospitality respects the guest's traditions and culture and is solely an expression of courtesy and business etiquette. We refrain from acts of hospitality that could be negatively perceived by society or the recipient, seen as exerting undue influence, or otherwise harm Polpharma Group's reputation.
61. Hospitality towards healthcare professionals during promotional meetings and scientific events is acceptable only within the limits set by applicable law. Hospitality must not be excessive in relation to the purpose and nature of the meeting and must not violate established customs.

We apply fair competition and promotion rules

62. Polpharma Group complies with fair competition rules and antitrust regulations.
63. We ensure that advertising and promotional activities are in line with applicable law, in particular by adopting and applying internal policies that include their verification process. When conducting advertising activities, we act honestly, reliably, and do not mislead anyone.
64. We do not accept providing customers or Counterparties with unreliable or false information, nor information that could be misunderstood or interpreted ambiguously.

We respect intellectual property and trade secrets

65. We do not use confidential information in any form, including electronic records, from previous employers or from any source without proper rights or authorisation.
66. We protect and safeguard Polpharma Group's commercial, technical, and scientific information that could harm us if disclosed. We prevent unauthorised sharing or use of such information. We apply the same protection to confidential information provided by our Counterparties.
67. We do not use intellectual property created by third parties, in any form, without having the appropriate rights.

We ensure product quality and safety

68. Polpharma Group's highest commitment is the responsibility towards patients and consumers for the quality, safety, and unobstructed access to the products we manufacture. We take care of it at every stage of development, production, storage, and sale.
69. We follow international Good Manufacturing Practice standards and strive to ensure that Employees feel co-responsible for product safety and quality, actively contributing through their daily actions to maintaining these standards.

We build good relations with suppliers

70. As a socially responsible company, Polpharma Group strongly values suppliers' adherence to international standards regarding the protection of human rights, including the prohibition of child labour and forced labour, workplace safety conditions, applying fair competition rules, counteracting corruption, and protecting the environment. It is important that suppliers are aware of and respect the ethical principles of Polpharma Group.
71. We follow the principle of objectivity and equal treatment of all entities seeking cooperation with us. We provide information and evaluate the quality of cooperation with suppliers in a reliable manner, striving to objectively and promptly clarify any doubts related to the cooperation process.

We are open to new technologies

72. Polpharma Group takes a responsible approach to innovative solutions resulting from the development of new technologies, including digital technologies and artificial intelligence. We accept their use only in a transparent, safe and fair way, within the limits of applicable law and with respect for human dignity. We do not accept technologies that may mislead, discriminate, or undermine trust.

We protect data and ensure cybersecurity

73. Polpharma Group complies with applicable data protection laws and cybersecurity regulations, including incident reporting obligations.
74. We are committed to safeguarding personal and business data, ensuring the integrity and security of IT systems. We promote cyber hygiene through education of Employees and take responsibility for managing digital risks.

We use medical data responsibly and communicate transparently

75. Polpharma Group is committed to the responsible use of medical data and technologies supporting patient safety. We ensure compliance with applicable regulations, protect patient privacy, and maintain transparency in our communication with healthcare professionals and patients.

We support patients and the medical environment

76. Polpharma Group engages in programs aimed at facilitating patients' access to modern diagnostics and providing education on prevention and healthcare. We cooperate with the medical environment in this area and support scientists in the fields of medicine and pharmacy.

We care for good neighbourhood

77. Polpharma Group strives to maintain positive relationships with local communities based on mutual understanding and cooperation. We seek to contribute to the development of local communities through input in economic, social, and cultural growth, in a manner corresponding to the scale of our operations in a given region.
78. We support and encourage the social engagement of everyone who works or cooperates with us. We care for those most in need through charitable activities (including donations of medicines), and by creating an environment that fosters grassroots initiatives such as employee volunteering.

We care for the environment and act sustainably

79. Polpharma Group is aware of the threats related to environmental degradation and climate change and takes them into account when planning and pursuing business objectives. We operate in accordance with applicable law, aiming to reduce our potential impact on the environment, as well as quality and conditions of living in the area of our influence.
80. We encourage ecological awareness and value initiatives that support climate protection and environmental improvement, both in the workplace and beyond.
81. We integrate environmental, social, and governance (ESG) principles into our operations, ensure transparent ESG reporting, promote ethical supply chain management, and actively prevent greenwashing. Our sustainability efforts reflect Polpharma Group's values and our responsibility towards future generations.

How to Act in Case of Doubts

82. The Code of Ethics constitutes the main source of knowledge about the ethical values and principles of conduct in Polpharma Group. It provides a framework for desirable behaviour, offering the support required to work in accordance with ethical standards and applicable laws.
83. In line with this Code, Employees should at all times assess whether a specific conduct:
 - a. supports building Polpharma Group's reputation as an honest and reliable business partner,
 - b. exposes Polpharma Group or its image to harm, or
 - c. puts Polpharma Group's customers at risk of lack of access to our products.
84. However, situations may occur in which the provisions of this Code prove insufficient for a proper ethical assessment. In such cases, Employees have the right to consult their doubts with their direct superior, the Local HR Function, or the Local Compliance Function (Chief Compliance Officer in case of Zakłady Farmaceutyczne Polpharma S.A.).
85. If unsure how to act in a given situation, Employees should ask themselves the following questions:

- a. Is my behaviour in a given situation compliant with applicable law, internal policies, and the ethical values and principles described in the Code of Ethics, as well as with my own values?
- b. Can this behaviour impact the decisions I make when performing my professional obligations?
- c. How will I feel if I act like this?
- d. Would I want others to behave like this every day?
- e. Would I want to be treated this way myself?
- f. How would my loved ones feel if they knew about my behaviour?
- g. How would my superior and other colleagues react to this situation?
- h. Could this situation expose Polpharma Group to financial or reputational loss?
- i. What would be the reaction of my loved ones, colleagues, and supervisor, as well as Polpharma Group's environment, if this situation were presented in the media? How would I feel then?

Reporting Violations of Law and Prohibited Acts

86. Any suspected or actual breaches of the Code of Ethics should be reported to the Chief Compliance Officer or the Local Compliance Function. The reporting process is described in the Procedure for Reporting Violations of Law and Prohibited Acts (locally adopted). For external stakeholders, there is a reporting channel available on Polpharma Group's website.
87. Polpharma Group treats each report with great importance and analyses it thoroughly. All reports are treated confidentially. The reporting person is protected against retaliation and always informed about undertaken follow-up actions.

Final Provisions

88. This Code is reviewed at least once every two years.

Related Documents

- a. Global Compliance System Policy
- b. Global External Affairs Policy
- c. Global Fair Competition Policy
- d. Global Policy – Netiquette
- e. Anti-Corruption Code (locally adopted)

- f. Procedure for Reporting Violations of Law and Prohibited Acts (locally adopted)
- g. Marketing Activities Instruction (locally adopted)
- h. Global Policy on Counteracting Mobbing and Discrimination in the Workplace
- i. Instruction in Case of Inspection or Search by Public Authorities (locally adopted)

Document History Review

	Effective date	Version	Change description (number of sections and attachment)
1	2026.02.01	v.0	replaces the Polpharma's Code of Ethics dated on 2.10.2023