

# Code of Conduct

## **Introduction:**

This Code of Business Conduct describes the fundamental principles for our conduct and is designed to promote lawful, ethical and trustful behavior by all employees of ALFRED E. TIEFENBACHER (GmbH & Co. KG) and TIEFENBACHER API + Ingredients GmbH & Co. KG and its affiliated companies (TIEFENBACHER GROUP) as well as all employees of subsidiaries and controlled entities. To maintain our reputation within the business community and the general public, each of our employees is personally responsible for avoiding unlawful and unethical behavior and complying with the Code of Conduct at all times. Under no circumstances will TIEFENBACHER GROUP pursue any business opportunity which would require it to violate the law or this Code of Conduct.

The following applies as well to individuals and / or organizations who provide directly or indirectly to TIEFENBACHER GROUP materials and services, including, but not limited to, contractors, consultants, suppliers, customers and other intermediaries, all of whom are herein referred to as “Partners”. TIEFENBACHER GROUP expects its Partners to act lawful, ethical and in compliance with this Code of Conduct.

## **Compliance with the Law**

As a world-wide active pharmaceutical company, TIEFENBACHER GROUP is subject to a wide variety of laws and regulations in every country where we do business. In addition to compliance with all applicable TIEFENBACHER GROUP policies, the observance of the law and regulations of the legal systems in which we operate is mandatory for all TIEFENBACHER GROUP employees. Any violation of the law by a TIEFENBACHER GROUP employee may result in disciplinary actions.

TIEFENBACHER GROUP’s relationship with Partners requires a defined and detailed exchange of information and pharmaceutical know-how.

TIEFENBACHER GROUP expects that Partners will act according to applicable national and international laws and regulations.

We expect Partners to communicate the principal elements described herein to their sub-contractors and sub-suppliers and to take these elements into consideration when selecting sub-contractor and sub-suppliers.

### **Competition and Antitrust Law**

TIEFENBACHER GROUP is committed to free and fair competition without unlawful restraints and collusion. Any violation of Competition or Antitrust Laws can have serious consequences for TIEFENBACHER GROUP, TIEFENBACHER GROUP's reputation and the offending TIEFENBACHER GROUP's employee. Such consequences may include the imposition of civil liability for damages, the invalidity of the agreement at hand and/or criminal prosecution of TIEFENBACHER GROUP and/or the individual involved. Therefore, each TIEFENBACHER GROUP employee must always comply with all Competition and Antitrust Laws of the countries where we do business and compete with our competitors solely on the basis of TIEFENBACHER GROUP's price, product, quality and service strategy.

### **Bribery and no tolerance of corruption**

TIEFENBACHER GROUP does not participate in any corrupt practices and we expect our partners to act accordingly.

TIEFENBACHER GROUP will not take part in bribery or corruption in order to secure any kind of business advantage. Even more TIEFENBACHER GROUP requires all its employees to refrain from any behavior that could potentially be construed as improper or contrary to the law.

TIEFENBACHER GROUP employees are strictly prohibited from directly or indirectly promising, granting or offering money or other improper incentives to public or government officials, any official, employee or representative of any government or state-owned company or international organization, business partners or any other person.

TIEFENBACHER GROUP employees must not exert unlawful influence on any of the above listed persons, e.g. by making gifts, doing favors or granting other advantages. Employees may not use their position at TIEFENBACHER GROUP to directly or indirectly request, obtain or accept money, improper gifts, favors or other advantages from business partners or other parties involved.

### **Prevention of money laundering**

TIEFENBACHER GROUP's policy is to neglect from conducting business with persons or entities who are involved in criminal or illegal activities. All employees must adhere to local and applicable foreign anti-money laundering laws and regulations. All cases of suspicious payment behavior or other unusual financial transactions, which raise doubts as to the legality of the source of the funds must be immediately reported to the respective Managing Director.

**Entertainment and gifts**

TIEFENBACHER GROUP employees must refrain from offering or accepting gifts which may influence their professional behavior or in circumstances where the outcome of a transaction may be influenced by the gift. TIEFENBACHER GROUP employees may offer or accept certain gifts or invitations that are of modest value and that are customary in the normal business practice and compliant with applicable national and/or international laws. Gifts in the form of cash may never be offered or accepted.

**Confidentiality**

Any kind of confidential information such as facts, data, knowledge, financial data to any third party or use such information for its personal benefit shall not be disclosed unless a valid and enforceable confidentiality agreement's exist between the Partners involved.

Partner shall safeguard and make appropriate use of confidential information to ensure that all employees and Partner privacy and intellectual property rights are preserved.

**Health, Safety and Environmental Protection**

TIEFENBACHER GROUP pays high attention to all aspects which are related to health, safety and environmental protection. This is the basis of all activities and shall be considered by all employees. TIEFENBACHER GROUP assets and facilities, business data and working materials may not be misused for private purposes or given to third parties if this might impair the interests of TIEFENBACHER GROUP.

Employees shall strive to protect natural resources and ensure that the TIEFENBACHER GROUP business activities minimize the impact on the environment through material savings and energy-efficient planning.

TIEFENBACHER GROUP takes appropriate measures to ensure proper handling of our products while they are under TIEFENBACHER GROUP's stewardship. This includes procurement, handling and storage, if applicable transportation as well as product dossiers and safety instructions.

**Data protection and use of electronic media**

TIEFENBACHER GROUP undertakes to treat personal data confidentially and to process it exclusively in accordance with applicable data protection regulations.

Where TIEFENBACHER GROUP provides access to and use of electronic media for business purposes, such electronic media may not be used for purposes that are contrary to any law, regulation, directive, guideline or other provision of TIEFENBACHER GROUP.

### **Personnel administration and behavior in the company**

The behavior of the company towards its (also future potential) employees is characterized by respect and fairness. The company respects the personality of its employees and rejects all forms of harassment and discrimination.

No one shall be disadvantaged or favored, harassed or excluded on account of their nationality, ethnic origin, skin color, age or appearance, gender, disability, sexual identity, religion or belief.

The principles of tolerance, respect, objectivity and fairness apply when dealing with each other and with third parties. This also applies to dealing with and in so-called social media.

Employees must at all times separate their private interests from those of the company.

### **Cooperation with authorities**

The regulatory obligations vis-à-vis the competent authorities must be observed. The company needs a good and cooperative relationship with all competent authorities. Information must therefore always be complete, correct and timely.

### **Dealing with the media and government agencies**

Questions from the press, etc., may only be answered by employees who have been specifically authorized to do so.

## **Ethical Standards and Human Rights**

Unless otherwise required or prohibited by law, the TIEFENBACHER GROUP warrants, to the best of its knowledge, that

- it does not employ engage or otherwise use any child labour in circumstances such that the tasks performed by any such child labour could reasonably be foreseen to cause either physical or emotional impairment to the development of such child;
- it does not use forced labour in any form (prison, indentured, bonded or otherwise) and its employees are not required to lodge papers or deposits on starting work;
- it provides a safe and healthy workplace, presenting no immediate hazards to its employees. Any housing provided by TIEFENBACHER GROUP to its employees is safe for habitation. TIEFENBACHER GROUP provides access to clean water, food, and emergency healthcare to its employees in the event of accidents or incidents at the TIEFENBACHER GROUP's workplace;
- it does not discriminate against any employees on any ground (including race, religion, disability or gender).
- it does not engage in or support the use of corporal punishment, mental, physical, sexual or verbal abuse and does not use cruel or abusive disciplinary practices in the workplace;
- it complies with the laws on working hours and employment rights in the countries in which it operates;
- it is respectful of its employees right to join and form independent trade unions and freedom of association.

## **Legal consequences of non-compliance**

Violations of this Code of Conduct are unacceptable and may result in disciplinary action until dismissal and, depending on the nature of the violation, civil liability and criminal prosecution.

TIEFENBACHER GROUP assures that no employee who reports irregularities or suspicions will be harmed or otherwise disadvantaged.