

Code of Corporate Conduct

Sona Pharm

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Reviewed by

Head of Legal & Compliance

I. Executive Statement

At Sona Pharm (hereinafter also referred to as Company), we are committed to cultivating ethical, transparent, and compliant partnerships with our business associates, a principle that defines our identity as a responsible organisation. Our Code of Corporate Conduct (hereinafter also referred to as Code of Conduct) serves as a foundational framework, ensuring that we operate with integrity and consistently uphold the highest standards in all our endeavours.

Each employee plays a vital role in maintaining these standards by adhering to the Code of Conduct and complying with all relevant laws, regulations, and industry codes. Should any concerns regarding potential misconduct arise, you are encouraged to seek guidance from colleagues, managers, or the Compliance Manager or report the matter through our [Trust Address](#).

Upholding these principles is a collective responsibility. By embedding them in our professional collaborations, we reinforce Company's long-standing reputation for excellence. More than just an enterprise, Sona Pharm is a dedicated team of professionals driven by a shared mission – to enhance patients' lives. Every day, we strive to expand access to high-quality medicines and equip healthcare providers with innovative solutions. We take pride in our contribution to global healthcare, enabling individuals to manage serious illnesses, improve their well-being, and fully enjoy everyday life. Together with our partners, we harness global best practices to advance patient care and drive meaningful impact.

II. Our Commitment

Sona Pharm is internationally operating pharmaceutical group.

We are committed to respecting the cultural diversity and national interests of the countries in which we operate and those we will engage with in the future. We uphold a workplace that fosters equality, ensuring that all employees, regardless of gender, religion, political beliefs, nationality, or cultural background, have equal opportunities for professional growth and career advancement.

Our goal is to drive progress and contribute to the prosperity of society. We are dedicated to enhancing people's quality of life through our work. By developing a business that delivers meaningful benefits to consumers, market partners, and society as a whole, we create lasting value and positive effect.

We work to establish long-term, trustworthy business relationships. Through the distribution of pharmaceuticals, medical supplies, and other healthcare-related products, as well as the provision of complementary services such as pharmacovigilance and regulatory support, we aim to expand opportunities for our clients. To achieve this, we concentrate our efforts on business areas where we can leverage our expertise and competitive advantage by delivering exceptional product quality.

III. How we live up to our values

1. Internal – workplace

Management leads by example in daily actions.

Recognising our values form the foundation of our unity, and adherence to the Code of Conduct is essential for effective teamwork. Through open, trust-based conversations and constructive team meetings, managers ensure that employees understand their responsibilities. They consistently uphold our principles and demonstrate how our core values foster a distinctive Sona Pharm culture.

We foster a respectful and inclusive workplace that upholds individual dignity.

Each employee's conduct plays a vital role in maintaining a culture of professionalism and partnership. Any form of harassment is unacceptable as it undermines personal dignity and creates a hostile environment. We are committed to a workplace where conflicts can be addressed openly, concerns about discrimination or inappropriate behavior can be raised without hesitation, and all colleagues, business partners, and customers are treated with respect. Employees are encouraged to report any issues to supervisors or designated reporting channels.

Commitment to a Safe and Healthy Workplace

We prioritise a safe, healthy work environment that supports long-term well-being and work-life balance. Employees and employers collaborate to create optimal conditions, address workplace issues, and uphold safety standards. We follow all safety regulations, report concerns promptly, and remain vigilant to prevent accidents.

Data Protection and Confidentiality

We are dedicated to protecting the personal data of patients, research and business partners, and our employees. We will collect, process, and store personal data in compliance with legal requirements, ensuring transparency, security, and the protection of individual privacy. Foremost, we ensure that Security policies and procedures are implemented to safeguard confidential information and prevent unauthorised disclosure.

We remain conscious of representing Sona Pharm.

Both in public and in our personal lives, we understand that we may be seen as its representative in both settings.

Conflict of interest

Employees must disclose any personal relationships within the Company, including marriages or other close affiliations, to ensure transparency and fairness in professional dealings.

2. External relations

a) Partners and Customers

We uphold the principles of fair competition.

For us, competition means winning customers through high-quality products and solutions and securing our place in the market. This commitment to fair competition extends to every country in which we operate. While competition can be challenging, it drives us to achieve our goals by leveraging our expertise and services.

We firmly reject any unlawful agreements with competitors or arrangements designed to manipulate the market. We embrace competition as an opportunity to excel and consistently deliver market-leading products and solutions.

Engagements with Healthcare Professionals, Patients, and Patient Organisations

At Sona Pharm, we engage with Healthcare Professionals (HCPs), Healthcare Organisations (HCOs), Patients, and Patient Organisations (POs) strictly for legitimate purposes, ensuring full compliance with applicable regulations. Our interactions are governed by robust procedures that mandate documented review, approval, and disclosure of Transfers of Value, with service fees reflecting Fair Market Value. We carefully select appropriate venues aligned with professional objectives and ensure that expenses remain reasonable to prevent any undue influence.

To uphold the highest ethical standards, we provide comprehensive training and monitoring to ensure compliance with internal policies and local regulations. Third Parties acting on behalf of Sona Pharm are equally required to adhere to our standards and all relevant legal obligations.

Healthcare Professionals

Medical Sales Representatives are well-versed in the requirements of the Applicable Code, as well as all relevant laws and regulations. They undergo thorough training and possess the necessary scientific knowledge to deliver accurate and comprehensive information about the Medicinal Products they promote.

Medical Sales Representatives must adhere to all applicable legal and regulatory requirements, with Company and its affiliates responsible for ensuring their compliance. They are expected to conduct their duties with professionalism, integrity, and ethical responsibility.

Furthermore, Medical Sales Representatives must ensure that their visits to healthcare professionals, pharmacies, hospitals, or other healthcare facilities are conducted in a manner that is professional, non-disruptive and free from improper incentives or misleading practices. They must not use incentives or deceptive tactics to secure meetings and, from the outset of any interaction, must clearly present their identity and that as a part of Sona Pharm.

They must act responsibly and ethically, providing accurate information about the Medicinal Products they promote. In line with regulations, they must share electronic descriptions of promoted products with each HCP they visit and promptly report any feedback, especially adverse effects, to the Company's pharmacovigilance unit.

Patients

Additionally, if patients reach out to us directly, we ensure they are referred to a qualified healthcare professional for appropriate medical guidance. However, in certain circumstances, designated departments, such as Medical Advisers specialising in scientific communication, may engage with patients regarding product-related inquiries. These professionals maintain an independent role, separate from the marketing department, report directly to the director, and are authorised to provide information in strict adherence to applicable regulations.

Furthermore, the Pharmacovigilance Unit (PVU) is responsible for monitoring and assessing the safety and efficacy of medicinal products by systematically collecting, analysing, and evaluating reports of side effects and patient feedback. As part of its mandate, the PVU is authorised to contact patients when necessary to obtain further information, ensuring a comprehensive understanding of adverse reactions and overall treatment experiences. This process contributes to the continuous improvement of patient safety and regulatory compliance.

Patient Organisations

At Sona Pharm, we are committed to upholding the highest ethical standards when engaging with POs, in alignment with the principles established by the [EFPIA](#) in collaboration with pan-European POs.

- We will safeguard the independence of POs, ensuring that their policies, activities, and political positions remain autonomous.
- We will foster partnerships based on mutual respect, valuing the perspectives and decisions of both parties equally.
- We will neither request nor encourage POs to promote specific Prescription Medicines.
- We will ensure full transparency in all collaborations, with any Transfers of Value clearly disclosed.
- We will encourage POs to secure funding from diverse sources to maintain their independence.
- We will strictly comply with EU and national regulations prohibiting the promotion of Prescription Medicines to the general public.

When providing financial, significant indirect, or substantial non-financial support to POs, we will formalise the arrangement through a written agreement. This agreement will specify the funding amount, its intended purpose (e.g., unrestricted grant, sponsorship of a specific event or publication), and any significant indirect or non-financial contributions, such as funding for public relations services.

We will not exert influence over the content of materials produced by sponsored POs to serve our commercial interests. However, we may correct factual inaccuracies when necessary. Additionally, upon request from a PO, we may contribute to drafting materials, ensuring that our input remains objective, scientifically accurate, and impartial.

Promotional activities

At Sona Pharm, we recognise the strict regulations governing Medicinal Product promotion and are committed to full compliance. Pharmaceutical advertising is highly regulated globally. We not only comply with all legal requirements but also uphold even stricter internal standards when marketing our products. Robust processes and training ensure promotional activities are properly evaluated and approved, with employees and Third Parties trained to follow applicable laws, regulations, and internal policies.

Promotional materials provide accurate, balanced, and complete product information. Promotion is limited to products with valid Marketing Authorisation for approved indications.

In compliance with applicable national laws and regulations, all promotional materials at least must clearly and legibly include:

- Essential information aligned with the product's summary of characteristics, along with the date of its creation or latest revision.
- The supply classification of the medicinal product.
- When relevant, the selling price or indicative pricing of different presentations and the conditions for reimbursement by social security authorities.

Further, all promotional activities must:

- Maintain the reputation and credibility of the pharmaceutical industry.
- Acknowledge the unique nature of medicinal products and respect the professional expertise of the target audience.
- Avoid content that may be deemed offensive.

Product samples, if applicable, are provided upon request, following local laws and with written acknowledgment from HPCs. All digital communications comply with relevant laws and regulations.

Specific Requirements for Interactions with Healthcare Professionals and Organisations

Medical education aims to enhance scientific knowledge and competence among HCPs to improve clinical practice and patient outcomes.

While we support or engage in various medical education activities, these are not considered promotional under this Code. When funding independent medical education or organising such activities – either directly or in collaboration with third parties – we ensure their involvement is clearly acknowledged from the outset.

For medical education activities where Sona Pharm representatives contribute to content, we are responsible for ensuring that all information presented is fair, balanced, and objective. The content should facilitate the discussion of diverse perspectives and recognised scientific opinions.

Restriction of Divided Loyalty

Any relationships between the Company and Healthcare Professionals (HCPs) or HCOs must be appropriately managed to prevent conflicts of interest. Interactions with HCPs must not

improperly influence prescribing practices or create any perception of undue advantage in the promotion or sale of our medicinal products.

Prohibition of Gifts

In every country where we operate, the provision of gifts for personal benefit, including but not limited to event tickets or social courtesy items, to HCPs, members of healthcare organisations, or representatives of POs, whether directly or indirectly, is strictly prohibited.

Furthermore, the offering or provision of cash, cash equivalents, or personal services is expressly forbidden. In this context, personal services refer to any service unrelated to the recipient's professional responsibilities that yields a personal advantage.

Donations and Grants to Healthcare Organisations and Patient Organisations

In every country where we operate, donations and grants - whether in cash, in kind, or other forms - to HCOs and POs are permitted only if they:

- support healthcare, research, or education;
- are properly documented and maintained on record by the donor; and
- do not serve as an incentive to recommend, prescribe, purchase, supply, sell, or administer specific medicinal products.

Donations and grants to individuals are strictly prohibited.

Contributions to Event Costs

When supporting HCPs or PO representatives in attending international events, we ensure that sponsorships of HCOs and POs are transparent and clearly acknowledged from the outset. We strictly adhere to applicable codes and regulations governing the selection and support of attendees. Under no circumstances may payments be made solely to compensate for the time spent attending an event. Additionally, events must be held in business-appropriate venues that are not primarily intended for leisure or wellness activities and do not qualify as luxury establishments, ensuring adherence to professional integrity and compliance standards.

At Sona Pharm, we may organise or sponsor events outside our home country or countries of Company's affiliates only under specific circumstances:

- When the majority of invitees are from outside home country, hosting the event in another country is the most practical logistical solution based on their locations.
- When the event is centered around a particular resource or expertise that is best accessed in a different country, making it more reasonable to hold the event there.

We will ensure that any hospitality offered in connection with such events remains appropriate and fully compliant with our Code. Hospitality will be strictly limited to travel, meals, accommodation, and genuine registration fees and will only be extended to individuals who are legitimate participants of the event.

In exceptional cases where a participant has an established medical need (such as a disability or injury), we may reimburse the travel, meals, accommodation, and registration fees for an accompanying person within the same parameters.

All hospitality provided to HCPs, members of HCOs, or representatives of POs must be reasonable in nature and solely linked to the event's primary purpose. As a general principle, the level of hospitality should not exceed what participants would reasonably pay for themselves.

Sona Pharm strictly prohibits any form of hospitality that includes sponsorship or the organisation of entertainment events, such as sporting or leisure activities.

b) Governmental Bodies and Social Responsibility

We engage in constructive and transparent dialogue with policymakers and society as a whole.

To achieve this, we utilise various opportunities for open and meaningful discussions. We actively participate in policy debates, particularly when evaluating the future implications of current decisions.

We remain receptive to new ideas and those who bring them forward. Our approach involves fostering productive dialogue with experts, organisations, and institutions.

We openly share our perspectives, ensuring clear and transparent communication and the exchange of information.

IV. You are what you stand for, how do we ensure our values

1. Workshops and trainings

Our values are supported by training to ensure their integration into everyday work.

When unsure about a decision or action, employees are encouraged to seek guidance. Supervisors are the primary point of contact, but employees and managers can also reach out to the Compliance Manager, who is dedicated to assisting in evaluating situations and giving advice to implement effective measures to mitigate or prevent business risks.

Annually, we conduct workshops to update compliance risk mitigation practices and policies in alignment with evolving local regulations across our operational jurisdictions. Each training session is followed by a mandatory assessment, ensuring all Sona Pharm employees complete the program successfully.

2. Anti-corruption measures

We are committed to upholding integrity and fairness in all our activities.

We do not tolerate corrupt behavior committed by our employees or Third Parties acting on our behalf. Systems and controls are established to prevent fraud targeting Sona Pharm, our

partners, or government entities. Our anti-corruption program is developed in strict compliance with applicable national laws and regulations, ensuring alignment with local legal frameworks and best practices in ethical business conduct.

Our employees and Third Parties are trained to follow procedures designed to prevent bribery. Any suspected incidents of fraud or bribery are thoroughly investigated, and appropriate actions are taken.

Business decisions made by our employees are never influenced by gifts or other benefits from business partners.

3. Open dialogue culture

We view mistakes as opportunities to grow and improve.

Every day offers learning experiences, whether through developing innovative solutions, tackling exciting new tasks, or performing routine duties. We gain knowledge from new experiences, insights, and even the errors we make. By addressing mistakes openly and honestly, we contribute to continuous improvement and help prevent potential harm. Admitting mistakes often requires courage.

Employees are expected to remain vigilant and proactive, reporting any suspected violations of internal or external rules. This helps address issues and prevent errors. Individuals who report concerns in good faith are protected from any negative repercussions.

The Compliance Manager is available for any questions about the Code of Conduct, with no prior approval needed. Responsible for its implementation, they offer expert guidance on legal and ethical matters. Inquiries are handled confidentially, ensuring compliance with legal and investigative requirements.

Additionally, we provide a [Trust Address](#), an email for reporting violations or seeking advice. All reports are treated confidentially, in line with legal and corporate requirements, ensuring the protection of employees who report misconduct in good faith. Retaliation is strictly prohibited.

Employees seeking guidance on the Code of Conduct can consult their supervisor or the Compliance Manager. If a supervisor is implicated in a violation, concerns should be reported through the [Trust Address](#) or directly to the Compliance Manager.

Confidentiality is maintained for those who disclose their identity. Any breach of confidentiality will prompt an internal investigation to safeguard the employee. Submitting false reports is strictly prohibited.