

Third Party Code of Conduct

Sona Pharm

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Head of Legal & Compliance

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I. Foreword

Sona Pharm is internationally operating pharmaceutical group. We market and distribute human pharmaceuticals and active pharmaceutical ingredients. Our products that support well-being help people take care of themselves every day.

Sona Pharm (hereinafter also referred to as Company) is committed to sustainability in all its operations. Through Company's internal Code of Conduct and our management approaches of corporate responsibility Sona Pharm has established company standards that include ethical business practices, labour, human rights, health and safety, environment and related management systems. These standards apply to all Sona Pharm personnel.

We are committed to high standards ourselves thus we regard ourselves entitled to expect the same from the Third Parties with whom we do business. In this context, "Third Parties" typically refers to our Business Partners i.e. providers of goods and services, but can also include, inter alia, agents, distributors, wholesalers, licensors, licensees and sales entities. All of Company's Third Parties are required to implement the principles of this Third Party Code of Conduct across their whole business relevant to the providing of goods and services for Sona Pharm, or other dealings with the Company.

As part of our unwavering commitment to excellence and sustainability on a global scale, we introduce this Third Party Code of Conduct ("Code") as a guiding framework. Our objective is to ensure that every stage of our products' journey is conducted in a manner that is fair, transparent, ethical, and ultimately sustainable.

Recognising that our suppliers and business partners are integral to this vision, we consider you essential contributors to our broader sustainability strategy. By upholding the highest standards – both our own and those of our valued partners – we collectively drive a global shift towards responsible business practices, fostering a more ethical and sustainable future.

II. To our Business Partners

This Code applies to all providers of goods and services to Sona Pharm, including sales intermediaries such as dealers, distributors, wholesalers, agents, and resellers. For the purposes of this Code, both Suppliers and sales intermediaries are collectively referred to as "Suppliers".

The Code outlines the fundamental standards that Suppliers are expected to uphold in key areas, including human and labour rights, occupational health and safety, business integrity, environmental protection, continuous improvement, and supplier management.

This Code does not preclude Sona Pharm or its Suppliers from implementing more specific or stringent requirements, whether through contractual agreements or internal governance policies.

III. Ethical Commitment and Business Integrity

Responsible and Transparent Interactions

Each Supplier must fulfil its obligations under the Code with professionalism, integrity, and without any bias or conflict arising from personal or professional interests. Additionally,

interactions with Public Officials should only occur, when necessary, legitimate, and mutually beneficial. Such interactions must always serve a professional purpose, be conducted transparently, remain free from undue influence or conflicts of interest, and provide value to both Sona Pharm and society. Furthermore, all interactions, including any associated expenses, must fully comply with applicable laws and regulations.

Commitment to Anti-Corruption and Anti-Bribery

Suppliers are strictly prohibited from engaging in any form of corruption, extortion, or embezzlement. Under no circumstances shall suppliers offer or accept bribes, kickbacks, or any other illicit payments, either directly or indirectly through third parties. Suppliers must adhere to all applicable anti-corruption laws, regulations, and standards, including FCPA other international laws and conventions, as well as local anti-corruption laws of countries where our Suppliers operate.

Conflict of Interest

Suppliers must avoid any interactions with Sona Pharm employees that could create, or appear to create, a conflict of interest. If a supplier has associates or immediate family members employed by the Company, these potential conflicts must be disclosed before entering into any business relationship.

Anti-Money Laundering

Suppliers must implement stringent measures to prevent illicit funds from entering the legal financial system or being used to obscure the origin or destination of funds. They are expected to actively combat the financing of terrorism and promptly report any suspicious activity to Sona Pharm, regardless of its significance.

Fair Competition

Suppliers shall operate in accordance with principles of fair and robust competition, ensuring full compliance with applicable antitrust laws. They must not engage in anti-competitive agreements with competitors, misuse a dominant market position, or participate in any other restrictive trade practices. Additionally, suppliers must uphold fair business standards, including truthful and accurate marketing and promotional practices.

Fraud Prevention

Suppliers are required to maintain comprehensive policies, procedures, and internal controls to prevent fraud, theft, embezzlement, and financial misrepresentation. Any such incidents must be reported to Sona Pharm immediately, regardless of their materiality. Suppliers must also ensure the accuracy of their financial records, maintaining detailed accounts that fairly represent transactions, assets, liabilities, revenues, and expenses without falsification or misleading documentation.

International Trade Compliance

Suppliers must fully comply with all import and export regulations, sanctions, and trade compliance laws. They are responsible for providing truthful and accurate information to customs and other relevant authorities whenever required.

IV. Business Ethics in the Pharmaceutical Industry

Gifts, Hospitality, and Other Benefits

Suppliers must prohibit both the giving and receiving of bribes, kickbacks, or any improper payments. They shall refrain from offering gifts, gratuities, hospitality, meals, or entertainment to Sona Pharm employees, government officials, or third parties in situations where such actions could influence or appear to influence decision-making.

Donations and Grants

Suppliers must ensure that any donations or grants made under the Code receive prior written approval from Sona Pharm on a case-by-case basis. These contributions must always serve legitimate purposes and must never be offered to obtain business advantages. Additionally, all donations and grants must strictly adhere to applicable laws, regulations, guidelines, and industry standards to maintain transparency and ethical business practices.

Interactions with Healthcare Professionals and Patient Organisations

Suppliers must ensure that all interactions with healthcare professionals, healthcare organisations, and patient organisations are conducted for legitimate purposes and in full compliance with applicable laws, regulations, and industry standards. To uphold these standards, suppliers must document the necessity and professional purpose of each interaction, ensuring transparency and preventing conflicts of interest. Before initiating any collaboration or fee-for-service arrangement, a written agreement must be in place, with compensation reflecting fair market value.

When organising or sponsoring events, suppliers must choose venues that align with the professional nature of the engagement and avoid providing entertainment, leisure activities, or invitations to spouses, family members, or other companions. Any coverage of travel, meals, accommodation, and registration fees must be necessary, reasonable, and strictly limited to event participants.

Additionally, suppliers must not offer, supply, or promise any gifts or financial incentives, whether in cash or in-kind, to healthcare professionals, healthcare organisations, or patient organisations. They must also implement robust systems and procedures to accurately record, report, and disclose all transfers of value in accordance with applicable regulations and industry standards.

Promotional Activities

Suppliers must ensure that all promotional activities fully comply with applicable laws, regulations, guidelines, and industry standards. Promotional practices must be ethical and transparent, prohibiting any undue or inappropriate benefits in exchange for prescribing, recommending, purchasing, supplying, or administering medicinal products.

All promotional materials must be accurate, up-to-date, properly referenced, and approved through Medical, Legal, and Regulatory review before use. Furthermore, Suppliers may only promote products that hold valid market authorisation in the country where they operate and

must refrain from engaging in off-label promotional activities. Any off-label information shared must strictly adhere to local laws, regulations, and Company's procedures.

In addition, Suppliers must ensure that product samples provided to healthcare professionals are only distributed upon request, properly controlled, and accounted for. To uphold compliance and industry standards, relevant employees must also complete appropriate training on promotional practices as reasonably required by Sona Pharm.

V. Environmental Compliance and Safety

Suppliers are responsible for implementing and upholding comprehensive health, safety, and environmental procedures to ensure full compliance with applicable laws, regulations, guidelines, and industry standards. This includes proactively identifying and mitigating risks to create a safe and sustainable working environment. Additionally, Suppliers must ensure that its employees operate under safe and healthy conditions and are equipped with the necessary training and knowledge to perform their duties effectively. By fostering a culture of safety and environmental responsibility, Suppliers must also take appropriate measures to minimise its ecological footprint and contribute to long-term sustainability.

Suppliers are required to adhere to all applicable environmental regulations or, in the absence of such regulations, align with internationally recognised standards and best practices. They must obtain and maintain all necessary permits, licenses, registrations, and restrictions while ensuring full compliance with operational and reporting obligations.

To minimise environmental impact, Suppliers must implement robust systems for the safe handling, transportation, storage, recycling, reuse, and disposal of waste, air emissions, and wastewater. Preventative measures must be in place to mitigate the risk of accidental spills or discharges into the environment. Any waste, emissions, or wastewater that could pose a threat to human health must be properly controlled and treated before release.

VI. Human and Labor Rights

Suppliers are obligated to comply with all relevant national and international laws concerning human rights and labour rights, ensuring ethical and responsible business practices. This includes guaranteeing that employees receive a fair and sufficient income to meet their basic needs and are provided with adequate rest to maintain their well-being.

Respect for fundamental labour rights is essential, including upholding employees' right to freedom of association and collective bargaining, allowing them to advocate for fair working conditions without fear of retaliation. Furthermore, Suppliers must take concrete steps to prevent and eliminate child labour within their operations and supply chains, ensuring compliance with international labour standards and promoting the protection and welfare of children. By implementing these principles, Suppliers contribute to a more just, sustainable, and socially responsible business environment.

Commitment to Fair Treatment and Non-Discrimination

All Suppliers are expected to foster a fair, ethical, and inclusive work environment, ensuring a workplace free from discrimination, harassment, and bullying. Discrimination in any form is

strictly prohibited, including but not limited to biases based on race, ethnicity, gender, gender identity, colour, national origin, religion, age, sexual orientation, disability, political affiliation, marital status, or any other legally protected characteristic. Additionally, Suppliers must not tolerate any form of intimidation or inhumane treatment of workers, including sexual harassment, verbal or sexual abuse, corporal punishment, or physical and psychological coercion.

VII. Occupational Health and Safety

Ensuring worker safety is paramount. Suppliers must comply with all relevant occupational health and safety regulations or adhere to international safety standards when local regulations are lacking. A safe and healthy work environment must be maintained, including any company-provided living accommodations. Exposure to chemical, biological, physical, and environmental hazards must be minimised, and workers must have access to comprehensive safety information regarding hazardous materials, particularly pharmaceutical compounds and intermediates.

Additionally, Suppliers must proactively identify and assess risks associated with chemical and biological processes, implementing measures to prevent, mitigate, and respond to potential catastrophic incidents such as chemical spills, biological agent releases, fires, or explosions. Emergency preparedness plans must be in place to address workplace hazards and minimise the impact of unforeseen events.

VIII. Safeguarding Security and Assets

Security Risk Management and Business Continuity

Suppliers must implement comprehensive asset and security risk management practices throughout their organisation to ensure the systematic identification, assessment, and effective mitigation of security risks. This applies to both tangible and intangible assets, digital and non-digital resources, employees, and customer assets managed on their behalf. Additionally, Suppliers must establish and maintain security incident detection, response, and recovery processes, including business continuity and disaster recovery measures. Any security incidents affecting Sona Pharm, regardless of their material impact, must be reported immediately, along with timely communication of any significant security risks.

Protection of Proprietary Information and Privacy

Suppliers are responsible for safeguarding proprietary and confidential information belonging to others, including written documents, software, patents, and other intellectual property. They must respect and protect Company's confidential information and the intellectual property rights of third parties by preventing misuse, mishandling, counterfeiting, theft, fraud, or improper disclosure. Compliance with applicable laws and contractual obligations is essential to ensuring information security and intellectual property protection.

Data Privacy and Protection

Company's approach to data privacy is grounded in European legislation, particularly the EU General Data Protection Regulation (GDPR), while also considering local data privacy laws

and requirements. Suppliers must process personal data received from Sona Pharm strictly in accordance with the agreed purposes and as outlined in a written agreement. Any information systems used to store or process such personal data or other confidential information must be adequately managed and safeguarded against unauthorised access, use, disclosure, modification, or destruction. Additionally, Suppliers must only collect personal data for legitimate business purposes, ensuring that processing is conducted legally, transparently, and securely. Access to such data must be restricted to authorised individuals, protected in compliance with security policies, retained only as long as necessary, and, if shared with sub-processors, handled under appropriate safeguards.

Transparency and Financial Accountability

Suppliers must comply with transparency laws and codes requiring Sona Pharm to disclose certain transfers of value, including payments to healthcare professionals (HCPs), healthcare organizations (HCOs), and patient advocacy organisations (PAOs). Those engaging with these entities on behalf of Sona Pharm must ensure that all transfers of value are lawful, accurately recorded, and properly documented to meet both Company's and, where applicable, their own transparency reporting obligations.

Additionally, Suppliers must maintain accurate and complete books and records that fully reflect all business transactions, payments, and relevant information related to Sona Pharm. Proper supporting documentation must be retained to ensure compliance with applicable laws and adherence to this Code. Invoices submitted to Sona Pharm must be precise, meet contractual requirements, and provide sufficient detail on services rendered, expenses incurred, and supporting documentation to verify the appropriateness of payments.

IX. Improvement and Management Systems

Application to Suppliers and Their Supply Chain

Suppliers must ensure that the principles outlined in this Code are upheld and adhered to by their own suppliers and business partners, including dealers, distributors, and agents. They are responsible for actively monitoring, addressing, and documenting any risks related to these principles within their supply chains to maintain ethical and responsible business practices.

Legal and Regulatory Compliance

Suppliers are required to identify and comply with all applicable international, national, and local laws, regulations, contractual agreements, and internationally recognised standards. This includes obtaining, maintaining, and keeping all necessary permits, certificates, licenses, and registrations up to date to ensure full legal and regulatory compliance.

Training and Competency

Suppliers must communicate the principles of this Code to all employees and contracted workers, ensuring that the information is available in their native language. If a Supplier has its own Code of Conduct that aligns substantially with these principles, it is sufficient to inform employees and contracted workers of its provisions. Additionally, Suppliers must implement training programs to educate their employees and contracted workers on the principles outlined in this Code or, where applicable, their own. These training programs must be regularly updated and conducted regularly to reinforce compliance and awareness.