

CODE OF CONDUCT



OUR CODE OF CONDUCT

GUIDED BY PURPOSE, DRIVEN BY VALUES

Our six core values:



Integrity:

Acting with honesty and consistency to build trust in every interaction



Courage:

Taking bold action to create sustainable growth



Achievement:

Setting and reaching important goals to ensure we make a positive impact



Transparency:

Promoting openness and clarity to strengthen trust



Responsibility:

Fulfilling our duties diligently to address societal needs with care



Respect:

Creating an inclusive and supportive environment for all

We strive for equitable outcomes and work to identify and eliminate barriers that may hinder our colleagues' contributions or ability to thrive, creating access to opportunity and advancement. It is our aim to ensure that our communication is inclusive, and we strive to use language that is both non-discriminatory and accessible to diverse audiences. This Code of Conduct document endeavors to employ gender-neutral language, which may not yet be consistent in all instances. Where masculine forms may appear, all genders are explicitly included and acknowledged.

► 1.1 A MESSAGE FROM OUR CEO

Dear Colleagues,

Our success is defined not just by what we achieve, but by how we achieve it. The journey is as important as the destination.

Our Code of Conduct is more than just a set of rules; it's our guide to living our company values. It applies to everyone, in every country, each function and at every level of our organization.

It helps shape our identity and reflects what we stand for. It provides a framework we can refer to when making decisions, and serves as our signpost for conducting business ethically, in compliance with global standards and laws.

In a world fueled by science and technology, we have the unique responsibility to drive innovation with purpose. Together, let's ensure that our values are the compass that guides us in sparking discovery to elevate humanity, while our Code of Conduct remains our guiding principle.

Sincerely,



Belén Garijo
Chair of the Executive Board & CEO



► 1.2 PREAMBLE

We believe in science and technology as a powerful force for good. As a diversified company with leading positions in Life Science, Healthcare, and Electronics, supported by our Enabling Functions, we are uniquely equipped to create a brighter, healthier, and more sustainable world for all. Each of our key sectors is driven by their own purpose:



In **Life Science**, we are committed to delivering solutions to create a sustainable world for future generations. **Together, we impact life and health with science.**



In **Healthcare**, we are at the forefront of developing pioneering therapies – boldly aiming to meaningfully change the lives of patients, their families, and their caregivers. **We help to create, improve and prolong lives – as one for patients.**



In **Electronics**, we accelerate the potential of AI and technology, **advancing digital living.**



In our **Enabling Functions**, we empower our organization by fostering a **business-centric mindset** and **driving impactful solutions**.

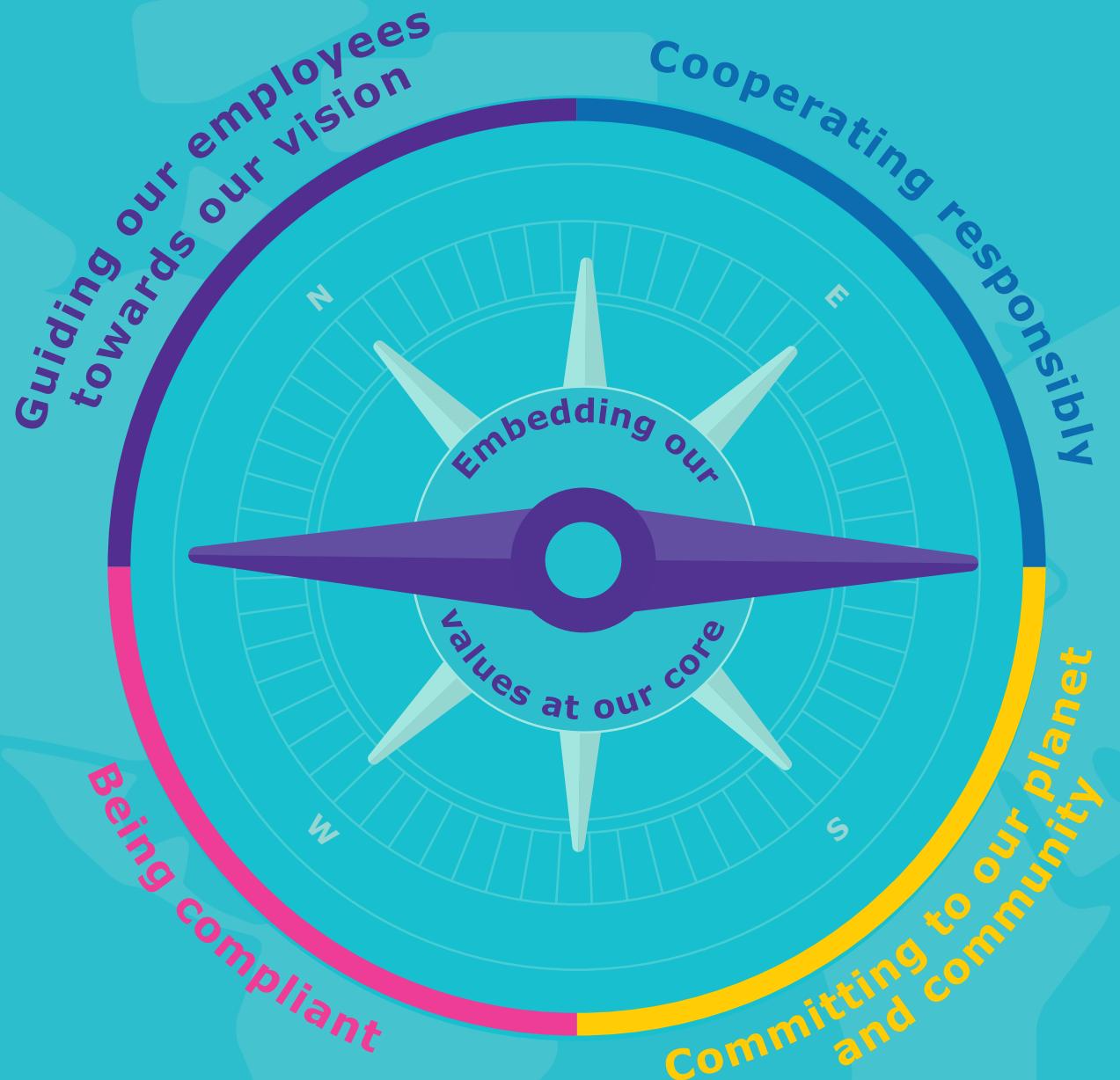
Our company vision – **“Sparking discovery, elevating humanity”** – is more than just a statement – it is a promise. A promise to millions of customers, patients, and communities who rely on our success to tackle the most pressing global challenges.



This vision is our **Guiding Star**, inspiring our diverse global team to deliver transformative solutions for the benefit of millions of people worldwide.

Our Code of Conduct outlines the behavioral standards that anchor our journey. In this Code, the word ‘we’ includes every one of us – employees, managers, and senior leaders alike. All of us have a fundamental role in bringing our vision to life, guided by our purpose, shaped by our values, and demonstrated through our behaviors.





EMBEDDING OUR VALUES AT OUR CORE

Our values are the compass that guides us through the complexities of an ever-changing world. They define who we are, shape how we act, and ensure we remain steadfast in our commitment to continuously improving and evolving, no matter the challenges we face.



For additional details on global governance documents, key programs and tools, topic-specific resources, and other helpful materials related to the upcoming chapters, visit our Code of Conduct intranet page.





2.1 WHAT DRIVES US	8
2.2 WHAT WE TAKE RESPONSIBILITY FOR	9
2.3 HOW OUR VALUES GUIDE US	10
2.4 HOW WE BRING OUR VALUES TO LIFE	11
2.5 WHY WE PROVIDE RULES AND GOVERNANCE DOCUMENTS	12
2.6 HOW WE RESPECT HUMAN RIGHTS AND LAWS	13

► 2.1 WHAT DRIVES US

We live in a highly complex world of rapid change and uncertainty. An aging population, chronic disease, climate change, developments in Artificial Intelligence (AI), and other megatrends motivate us to keep working towards new scientific breakthroughs that can make a positive difference across our global society. The fast pace of change will only increase over the coming years as technologies evolve and converge in ways that fundamentally transform how we live and work.



For us, change is not a threat, but an opportunity. For over 350 years, we have successfully harnessed our powers of resilience to anticipate and adapt to change. Today, as a diversified global science and technology company with leading positions in Life Science, Healthcare and Electronics, we are uniquely positioned for long-term growth.



► 2.2 WHAT WE TAKE RESPONSIBILITY FOR

Our multi-industry business model, diverse team, and global reach represent a unique competitive advantage. Grounded in our strong values and behaviors, we ensure that we carefully plan for the needs of both current and future generations.

Every decision we make is guided by a clear moral compass, anchored in our company values. Our High-Impact Culture and inclusive mindset provide the strength and agility needed to navigate through adversity. Above all, our company thrives because of the exceptional minds that work with us and the talent we attract, engage, and retain.

While our future is ripe with opportunity, we are also aware of the significant geopolitical and competitive challenges that lie ahead. To overcome these challenges and create long-term value for our company, our customers, and the patients we serve, we must channel our collective focus into the key growth areas. Here, we can truly lead and make a lasting impact, while carefully navigating geopolitical tensions.



► 2.3 HOW OUR VALUES GUIDE US

We operate across numerous countries, bringing together and collaborating with people from diverse nations and social backgrounds.

Our values are publicly shared to clearly represent what we stand for. Each of us is responsible for upholding these values in our daily work and ensuring they guide our actions.

These core values serve as the foundation of our culture and shape how we achieve success together:

Integrity

Acting with honesty and consistency to build trust in every interaction

- We keep our promises and stand by our commitments, ensuring our actions align with our vision, values, and behaviors.
- We do what is right, even in difficult situations or when no one is watching.

Respect

Creating an inclusive and supportive environment for all

- We value everyone in our organization, ensuring that we treat each other with consideration.
- We embrace diverse perspectives, recognizing that different viewpoints drive stronger outcomes.

Transparency

Promoting openness and clarity to strengthen trust

- We communicate clearly and truthfully to ensure a common understanding.
- We foster a culture of open dialogue where feedback and concerns are welcomed.

Achievement

Setting and reaching important goals to ensure we make a positive impact

- We develop innovative solutions that improve lives and drive progress.
- We challenge ourselves to continuously improve, delivering lasting benefits for society and the environment.

Responsibility

Fulfilling our duties diligently to address societal needs with care

- We make thoughtful, principled decisions and take accountability for them.
- We prioritize sustainable and responsible practices to create a positive impact.

Courage

Taking bold action to create sustainable growth

- We tackle obstacles with confidence and pursue bold ideas to drive innovation.
- We stand up for what is right, no matter the challenges.

► 2.4 HOW WE BRING OUR VALUES TO LIFE

The true worth of our values is realized when we turn them into action. Our behaviors, known as our 'High-Impact Culture' (HIC), help to bring the core values to life, guiding how we can embody them across the organization.

These behaviors give us focus, ensuring we concentrate on what truly matters — developing meaningful initiatives that address the needs of our customers and patients, while having the strength to avoid distractions.



Our six core behaviors define how we think, act, and make decisions:



Obsessed with customers and patients

We prioritize their needs and focus on the impact we generate for them.



Be curious and innovate boldly

We challenge our own thinking and the status quo.



Raise the bar

We constantly raise the bar of what we can achieve, ensuring we focus on what matters most to our customers.



Simplify and act with urgency

We cut unnecessary processes and focus on what matters most.



Disagree openly, decide and deliver

We think independently whilst always making decisions as a team.



To learn more about our behaviors, explore the HIC Manifesto on our intranet page.

► 2.5 WHY WE PROVIDE RULES AND GOVERNANCE DOCUMENTS

This Code of Conduct demonstrates how we wish to bring our values and behaviors to life, in everyday actions and decisions. In addition to this Code, we have governance documents in place for specific topics and areas that must also be complied with. They serve to protect both our employees and our company.



Each of us is responsible for upholding our Code of Conduct and ensuring we hold one another accountable. Everyone at our company is strongly encouraged to speak up when there are opportunities for improvement, to raise a concern and/or to report a misconduct.

Note: All information on governance documents, relevant departments and points of contact can be found on our intranet page.

Our Code of Conduct and supporting governance documents cannot cover every possible scenario. In our day-to-day work, we may encounter challenging situations where the appropriate behavior is not always the most obvious or the easiest option. If employees find themselves in a situation like this and are unable to find answers in specific documents, they can seek guidance from the principles specified in this Code of Conduct and in our company values. Managers and specialist departments, such as Compliance or Human Resources, are available as trusted points of contact, and every employee is encouraged to speak up through the designated reporting channels if needed.



► 2.6 HOW WE RESPECT HUMAN RIGHTS AND LAWS

We are a global science and technology company – and we recognize the significant responsibility that comes with our international presence. We adhere to statutory, social, and environmental guidelines and standards around the world; ensuring that our actions and decisions reflect our internal ethical business principles at every level.



Upholding human rights is both essential and non-negotiable for us.

We strive to minimize the risk of human rights violations not only at our own facilities, but throughout our entire supply chain. To achieve this, we are actively embedding human rights due diligence into our business processes.

The United Nations Global Compact is a leading initiative that promotes responsible corporate governance, and we have proudly been a signatory since 2005. Since then, we have consistently demonstrated our commitment to upholding its principles related to human rights, labor standards, environmental protection, and anti-corruption in every country where we operate. We also ensure that our external business partners adhere to the same high standards.



GUIDING OUR EMPLOYEES TOWARDS OUR VISION

We succeed together by working as one united team, grounded in our shared purpose and vision to spark discovery and elevate humanity. In the workplace, every action we take, decision we make, and interaction we have, reflects our commitment to achieving our collective goals. By staying focused on the bigger picture, constantly elevating our skills and living our values daily, we turn our vision into a reality and build a culture of trust, respect, and excellence.



For additional details on global governance documents, key programs and tools, topic-specific resources, and other helpful materials related to the upcoming chapters, visit our [Code of Conduct intranet page](#).





3.1 HOW WE CONDUCT OURSELVES IN THE WORKPLACE	16
3.1.1 Building trust	16
3.1.2 Fostering belonging and inclusion	17
3.1.3 Leading by example	18
3.1.4 Learning from our mistakes	18
3.1.5 Empowering growth and responsibility	19
3.1.6 Promoting employee wellbeing	19
3.1.7 Safeguarding privacy	20
3.1.8 Protecting company assets	21
3.2 HOW WE USE TECHNOLOGY AND PROTECT INFORMATION	22
3.2.1 Handling data & Artificial Intelligence responsibly	22
3.2.2 Protecting business information	23

3.1 HOW WE CONDUCT OURSELVES IN THE WORKPLACE

Our company values create a collaborative framework that inspires us to gather and apply knowledge across various businesses and functions. Our High-Impact Culture is defined by openness and a commitment to learning from one another. By treating each other with respect, we can find common ground, appreciate the contributions of our diverse colleagues, and work together constructively.

► 3.1.1 BUILDING TRUST

Our collaboration is based on mutual trust. This is the prerequisite for being open and honest with one another. We value each other and share different ideas and views in a constructive manner, thereby fostering an inspiring and motivating working environment where we can thrive.



Each employee's behavior plays a crucial role in cultivating collegial cooperation formed out of mutual respect. Our culture promotes trust and appreciation, we are committed to fostering a respectful and supportive environment. Whilst we champion open discussion, we actively discourage use of harmful language or behavior

that could create tension or discomfort among our colleagues, business partners or customers.

Any behavior that demeans or oppresses others, negatively affects a person's reputation, self-esteem or mental well-being and may constitute as harassment*, will not be tolerated.

We encourage employees to speak up and share concerns about any inappropriate behavior within their teams, addressing them with supervisors, Human Resources or through designated reporting channels if needed.

* **Harassment** can take different forms, for example, intimidation, hostility, humiliation, or insults.



► 3.1.2 FOSTERING BELONGING AND INCLUSION

Fostering an inclusive work environment is one of our greatest assets. We aim to maximize our potential by leveraging our individual skills and talents to create new, innovative, and sustainable solutions.

To achieve equal opportunity for all, we must not marginalize anyone. Therefore, we have zero-tolerance towards discrimination based on *inter alia*, gender or gender identity, culture or national origin, ethnic origin, race, color, religion or beliefs, disabilities, age, sexual orientation, family or marital status, military or veteran status or any other protected status or characteristic.



We do not tolerate any language or behavior that fosters an offensive or hostile workplace. Instead, we collaborate to create a culture of acceptance and mutual trust, treating each other with respect. We hire for excellence, while cultivating an inclusive, humane workplace with equal employment and advancement opportunities for all.

Unacceptable conduct between colleagues or manager and employee(s) is incompatible with the healthy, respectful and inclusive workplace we seek to maintain. Unacceptable conduct may include, but is not limited to:

- Disrespectful behavior
- Harassment & bullying
- Sexual harassment
- Unlawful discrimination

Managers should be role models for appropriate behavior and set the tone for the workplace, helping to prevent any occurrences of harassment.



► 3.1.3 LEADING BY EXAMPLE

Our managers recognize that our values unite us and that compliance with our Code of Conduct provide an important base for good teamwork.



Managers are the key point of contact for employees. It is essential to have one-to-one discussions characterized by trust and open feedback to ensure employees know what is expected of them.

Our managers consistently conduct themselves in accordance with our principles and communicate how our company values – courage, achievement, responsibility, respect, integrity and transparency – are the foundation for the behaviors outlined in our High-Impact Culture. Together, these create our company's unique culture, and this mindset allows us to continuously learn, evolve and grow.

► 3.1.4 LEARNING FROM OUR MISTAKES

We learn every day – for example, when we master fascinating new tasks, develop new solutions, or even when we perform routine duties. We learn from new experiences and insights, as well as from the mistakes we make.

We acknowledge mistakes directly and honestly, helping us to both improve and prevent possible damage to our company.



Acknowledging a mistake sometimes takes courage, one of our company values. We champion this as part of our open and transparent feedback culture.



Self-reflection question:

How did addressing a previous mistake I made help me or the team improve?



► 3.1.5 EMPOWERING GROWTH AND RESPONSIBILITY

We are driven to perform our tasks with diligence and to take responsibility, valuing the ideas and suggestions of all colleagues and managers.



By leveraging our individual knowledge and skills, we contribute to the overall success of the company. We embrace change, rather than clinging onto the status quo, continually seeking opportunities for personal and professional growth & development. Using our development tools, our employees are empowered to take charge of their own development journeys. We recognize and take responsibility for our actions, fostering a culture of accountability and growth.

► 3.1.6 PROMOTING EMPLOYEE WELLBEING

To achieve our goals, we must ensure our employees are set up to thrive. We all strive to work in an environment that prioritizes health and safety for ourselves, our families, and our company. To achieve this, we have collaboratively created an environment that

enables us to reach our full potential while fostering a healthy work-life balance, where both aspects enrich each other.

To support this initiative, we have launched a global employee health program, which offers tools and trainings designed to enhance the wellbeing of our employees.

We also work together to ensure a safe workplace, remaining vigilant about potential hazards. Our globally implemented safety program helps employees understand the importance of safety and fosters a strong safety culture across all levels of the organization.



We recognize that our safety guidelines are essential for our protection, and we adhere to them diligently. Local regulations serve as our minimum standard, and we comply with stricter global safety requirements when they apply.

We encourage open communication about safety concerns and promptly inform colleagues, supervisors, and on-site safety experts. To foster this, we have launched an easy-to-use app to report safety observations globally.



► 3.1.7 SAFEGUARDING PRIVACY

As part of our commitment to our employees and customers, we make sure we respect each person's individuality. Self-determination compels us to safeguard the personal data* entrusted to us with the utmost care.



In today's digital world, data can be easily and quickly collected, shared, and evaluated. This makes it essential for us to handle personal data responsibly in all our actions. This responsibility extends to information from employees, applicants, third parties, customers, patients, and study participants – both in personalized and pseudonymized** form.

We protect the data entrusted to us by handling it properly, using it only for the intended and authorized purposes, and always respecting the full rights of the data owner. Wherever possible, we obtain personal data directly from the relevant individual and maintain transparency about its use. We also take the appropriate precautions to prevent data misuse.



We respect the rights of others when handling their data and do not permit any actions that contradict this commitment, such as unlawful telephone or video recordings or the mining of private information. We are particularly respectful of highly sensitive information, such as data related to health or religion.



* **Personal data** is any information that refers to an identifiable natural person. For example: IP addresses of PCs, pseudonymized patient data, log files, lists of telephone numbers and dates of birth, photos and video recordings, bank details, car registration plates.

** Personal data is **pseudonymized** by replacing the name of the subject with an ID number. That makes it difficult to link the data to its subject.

► 3.1.8 PROTECTING COMPANY ASSETS

Our passion and dedication enable us to create new tangible and intangible assets daily, including new production facilities, products and solutions, improved workflows, our brand identity, and our long-term customer and business relationships.



Our innovations and new products are highly valuable assets. This is why we safeguard our creative business ideas and innovative developments by considering relevant property rights available to us at an early stage.



We handle our company's assets with care, ensuring they are not wasted, misused, or misappropriated. We ensure that all business transactions are correctly posted and recorded in our financial documentation and reports. We do not tolerate intentional inaccuracies in

bookkeeping and always prosecute in cases of fraud and breaches of trust. Each employee plays a vital role in maintaining and increasing the value of our company.



3.2. HOW WE USE TECHNOLOGY AND PROTECT INFORMATION

► 3.2.1 HANDLING DATA & ARTIFICIAL INTELLIGENCE RESPONSIBLY

We are committed to managing data and using Artificial Intelligence (AI) responsibly. As these technologies become increasingly integrated into our operations, we aspire to uphold ethical standards in every context. The advancements in technology, especially through data collection and AI processing, present new ethical challenges that apply to all of us.



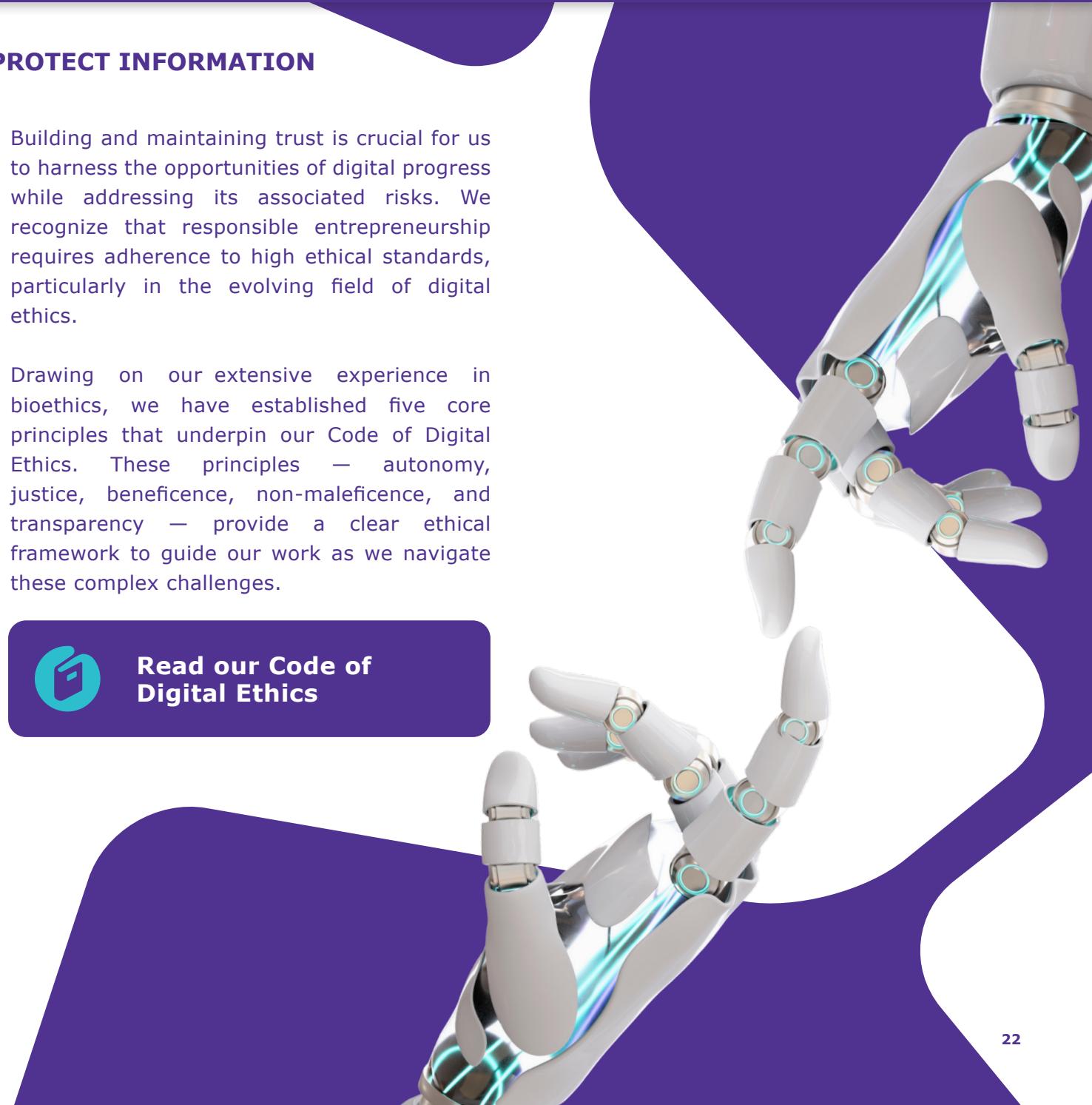
For example, while transparency in medical ethics primarily concerns the patient-doctor relationship, in data and AI ethics it remains an important principle, albeit with a notable shift in inflection, due to the elusive and complex nature of algorithmic systems that affect far more people. The ethical challenge lies in making these intricate data ecosystems and AI operations comprehensible to our employees as well as the general public and customers, as their trust heavily depends on understanding how their data is used and by whom.

Building and maintaining trust is crucial for us to harness the opportunities of digital progress while addressing its associated risks. We recognize that responsible entrepreneurship requires adherence to high ethical standards, particularly in the evolving field of digital ethics.

Drawing on our extensive experience in bioethics, we have established five core principles that underpin our Code of Digital Ethics. These principles — autonomy, justice, beneficence, non-maleficence, and transparency — provide a clear ethical framework to guide our work as we navigate these complex challenges.



[Read our Code of Digital Ethics](#)



► 3.2.2 PROTECTING BUSINESS INFORMATION

Business information includes any non-public information in any form that is highly valuable to our company, including, including innovations, inventions, new products, sensitive product information, business plans, current sales figures and strategic developments. Business information is one of our most valuable assets and gives us an edge in the market. It is the company's property and protected by law in many cases.



We classify this information as proprietary information and treat it with the utmost confidentiality. We do not share it without authorization and take all the necessary precautions to prevent unauthorized access.

We are exceptionally careful in how we handle all our business dealings. We only share business information with people (internally and externally) who absolutely need access to it.

Business information is encountered daily in various forms, including digital, written and verbal formats. To safeguard this information and ensure protection at the appropriate level, we follow the technical and organizational security measures established by our company, which includes the correct classification for all types of documents (including emails) as public, internal, confidential, or secret. Our individual behavior plays a crucial role in safeguarding business information and data against unauthorized access, modification, or loss.



We take special care to protect business information in the public sphere, particularly our communications on social media, business trips, and other public places.

We comply with the non-disclosure agreements we have set up with our external business partners, who place their trust in our reliability and our discretion. They can rely on us to handle their business information responsibly, just as we trust them to do the same.



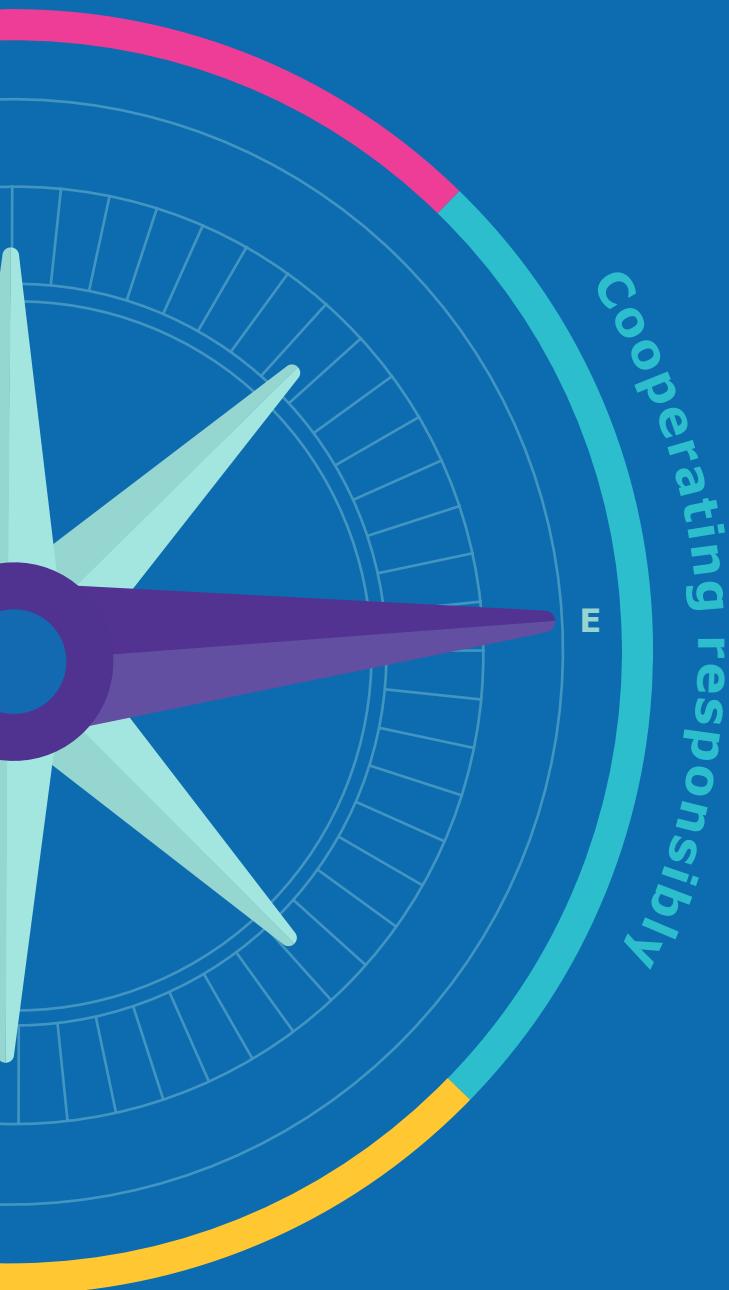
COOPERATING RESPONSIBLY

We achieve success through responsible collaboration with our partners and solution providers. By fostering mutual respect and mindful communication, we create strong, sustainable relationships that drive shared success. We are committed to conducting our partnerships with integrity, transparency, and fairness, ensuring that our collaborative efforts align with our values and contribute to a positive impact for all involved.



For additional details on global governance documents, key programs and tools, topic-specific resources, and other helpful materials related to the upcoming chapters, visit our Code of Conduct intranet page.





4.1 HOW WE WORK ETHICALLY	26
4.1.1 Establishing respectful collaboration	26
4.1.2 Ensuring fair competition	26
4.1.3 Committing to zero tolerance to corruption and preventing money laundering	27-28
4.1.4 Cooperating with the authorities	29
4.1.5 Managing donations and sponsorships	29
4.2 HOW WE WORK WITH PARTNERS	30
4.2.1 Being transparent in healthcare partnerships	30
4.2.2 Managing conflicts of interest	31
4.2.3 Handling inside information	32
4.2.4 Respecting intellectual property	32
4.2.5 Selecting suppliers responsibly	33

4.1 HOW WE WORK ETHICALLY

► 4.1.1 ESTABLISHING RESPECTFUL COLLABORATION

We foster respectful collaboration with customers and external business partners, aiming to continually enhance our products and services. Our significant investments in research and development yield valuable outcomes that we diligently protect, ensuring our offerings thrive in the market.



We seek partnerships with external business associates who share our commitment to fair competition and uphold these principles in their actions. Together, we can drive innovation and success for all involved.

► 4.1.2 ENSURING FAIR COMPETITION

In the context of antitrust regulations, we emphasize that competition should be driven by ideas, innovations, and high-quality products, allowing businesses to gain market traction fairly. This represents healthy and lawful competition, which we actively support

in all the regions where we operate.

While competition may pose challenges, it motivates us to achieve our objectives through our services, expertise, and innovations. We strictly reject any form of unlawful agreements or practices with competitors that could influence market dynamics. This includes any collusive arrangements aimed at manipulating competition.



As a science and technology company with a strong market presence across various regions and industries, we recognize our responsibility to uphold fair competition. We ensure that our market position does not impede the entry or growth of other players.

In line with antitrust principles, we embrace competition as an opportunity to ensure our products and solutions consistently rank among the best, benefiting consumers and fostering a competitive market environment.



► 4.1.3 COMMITTING TO ZERO TOLERANCE TO CORRUPTION AND PREVENTING MONEY LAUNDERING (1/2)

Corruption undermines competition and results in decisions that lack objectivity. Instead of awarding contracts to the suppliers who present the best offers, corrupt decisions involve deciding in favor of those who provide bribes or other illegal advantages.

We stand for fair competition, in which the supplier with the best products and services prevails. Accordingly, we firmly reject all forms of corruption and any attempts to gain improper influence as guided by our Group Anti-Corruption Standard.



We never make inappropriate offers to external business partners or other third parties to influence their decisions in our favor.

If we are approached with requests for inappropriate benefits* to secure a contract, we take decisive action against such practices. We are committed to ensuring that contracts are awarded solely based on our performance.

Consequently, we decline any inappropriate advances from external business partners or third parties that are intended to influence us or could potentially do so.



* Inappropriate benefits

Examples include cash payments or payments to suspicious accounts, such as slush funds, expensive personal gifts or improper invitations, and the granting of other advantages, such as private services without charge.

► 4.1.3 COMMITTING TO ZERO TOLERANCE TO CORRUPTION AND PREVENTING MONEY LAUNDERING (2/2)

Appropriate advantages to third parties, such as low-value courtesies and invitations to business meals, are offered only if this complies with applicable laws, codes and internal rules.

We employ due care in selecting the external business partners who support us, and we do everything in our power to ensure that they comply with applicable laws and our company principles.

Particular care is required when dealing with public officials*. We never influence public officials with inappropriate benefits – directly or indirectly. Any appropriate advantages offered to public officials complies strictly with applicable laws and company rules.



We condemn corruption. This means that if a possible case of corruption comes to our attention, we do not turn a blind eye. Instead, we report it, so that the incident can

* Public officials

Public officials are individuals who hold a public office or are employed by state-owned organizations or are affiliated in any way to a government-owned or funded organization. They are subject to particularly strict rules. They serve the public in their work and should not give or receive bribes. For example, public officials include employees of national and international organizations (e.g., United Nations, EU, WHO), members of political parties, candidates for political offices, and state-owned companies and non-profit organizations, such as research institutes.

be investigated by the responsible internal experts. Our business partners, customers, shareholders, employees, and the public place their trust in our integrity.

We are committed to preventing money laundering and terrorist financing by ensuring that our business is not exploited for criminal purposes. We carefully select our business partners, ensuring they do not engage in illegal activities, and comply with all applicable anti-money laundering (AML) and counter-terrorism financing laws and regulations.

The use of cash in transactions is generally prohibited, and we remain vigilant for red flags, such as payments by unrelated third parties or attempts to obscure the identity of business partners.

Any suspicious transactions must be promptly reported to Management, Compliance, or the AML Office for further investigation.



► 4.1.4 COOPERATING WITH THE AUTHORITIES

Government authorities and other public agencies strictly monitor compliance with statutory and regulatory provisions. We cooperate fully with the relevant authorities and support inspections, to ensure compliance with all applicable requirements.

► 4.1.5 MANAGING DONATIONS AND SPONSORSHIPS

Our company views itself as an integral part of society, contributing to the well-being of the communities where we operate. We support economic development and give back through our community engagement activities such as:

- **Donations:** Voluntary, obligation-free contributions to charitable causes, without expectation of return.
- **Charitable Sponsorships:** Support for events or activities serving charitable purposes, with acknowledgment of our company's contribution (e.g., logo display or exhibit space) defined in a formal agreement. Some examples include

programs and capacity building projects to underserved populations by our company, through the provision of financial support or non-cash benefits (e.g., products or services).

- **Corporate Volunteering:** Our employees participate in volunteer activities supported by the company, individually or in teams, often organized by local subsidiaries or business functions. Our community engagement efforts concentrate on three areas: Global Health, Education & Culture and Environment. Moreover, we offer support to people in need in the vicinity of our sites. In emergency situations we provide disaster relief. One example in our focus area of health is providing both basic and advanced training for healthcare workers, strengthening local healthcare systems, and raising awareness through community health education. Our projects in the field of education help to improve school and university education. As part of our global volunteer program, our employees share their skills and experience with students to spark their curiosity in science and inspire them to consider a STEM (Science, Technology,



Engineering and Mathematics) career. We collect data on our community engagement activities to maintain an overview and ensure transparency regarding our contributions and the impact we create for society.

4.2 HOW WE WORK WITH PARTNERS

► 4.2.1 BEING TRANSPARENT IN HEALTHCARE PARTNERSHIPS

In the healthcare sector, we collaborate with a diverse range of stakeholders, including research institutes, healthcare professionals, hospitals, and patient organizations. Our goal is to ensure that the most accurate, up-to-date information on diseases and treatments is readily available. By partnering with the scientific community, we remain committed to advancing healthcare, while prioritizing patient well-being. Our mission is to ensure that every patient receives treatment that is effective, safe, accessible and of high quality.



► CLINICAL STUDIES

We conduct clinical research of the highest quality, always in accordance with applicable laws and regulations. In our clinical studies, we uphold rigorous ethical and scientific standards worldwide.

► RESPONSIBLE MARKETING

Pharmaceutical advertising is tightly regulated globally. We advertise our products only after obtaining marketing authorization and always in line with the approved labeling. We strictly adhere to all applicable statutory requirements.

► COMMITMENT TO TRANSPARENCY

We are committed to research and medical education worldwide. We contribute to medical progress that benefits patients. Transparency around financial and non-financial support to healthcare partners is of utmost importance to us.

► 4.2.2 MANAGING CONFLICTS OF INTEREST

Employees may encounter a Conflict of Interest (CoI) when their personal interests — whether direct or indirect — conflict with the interests of our company. Personal interests could be private, political, financial, business or commercial.



A CoI arises when a personal interest unduly influences the employee's business judgment, decision-making or actions to the detriment of our company. Personal interests also include those of related persons and business partners of the employee. When such situations arise, every employee is obliged to discuss this with their direct manager and to document the CoI on our disclosure platform.



More information on this can be found in the CoI Group Procedure on our intranet page.

Personal gifts and invitations

In everyday business, we deal mindfully and professionally with personal gifts and invitations offered to us by customers or third parties. We

reject any offers that could influence us when making our business decisions which could infringe upon the interests of our company. If we have any doubts or concerns about the offer, we reject them.

When we accept gifts and invitations, we only accept them openly. This means that anyone may know about the gifts and invitations we have accepted.

Ownership of interests in other companies/participation in committees

If an employee wishes to acquire interests in other companies or actively participate on supervisory or expert committees, this should be openly discussed with their direct manager and must be disclosed. We examine whether the involvement or activity can be carried out without damaging our personal reputation or that of our company.



Relationships at work

We proactively disclose any potential conflicts of interest arising from any type of relationship with a colleague, direct report or manager, including romantic relationships, or other dependencies. In such situations, we initiate an open and honest conversation with our supervisor to address the matter transparently.



Self-reflection question:

Do I (or any related person) have personal interests that could influence my business judgement, decision-making or actions to the detriment of our company?

Am I fully aware of situations that could lead to a potential conflict of interest?

► 4.2.3 HANDLING INSIDE INFORMATION

As a publicly listed company, we strictly comply with applicable insider laws. We treat any non-public, precise information related to our company or its financial instruments, that could impact the price of our company's shares or other financial instruments (known as inside information*), as strictly confidential. We comply with our internal processes regarding the handling of inside information and do not disclose inside information without authorization, not even to colleagues, family, or close contacts.



Furthermore, we do not use inside information for personal or third-party advantage. This means that we refrain from buying, selling, or recommending trades involving our company's shares or financial instruments based on insider knowledge.

* **Possible examples of inside information** (subject to a case-by-case assessment):

- Unexpected changes in key financials (e.g., earnings)
- Major corporate acquisitions or divestments, restructurings
- Significant innovations or major business development deals

► 4.2.4 RESPECTING INTELLECTUAL PROPERTY

We invest heavily in research and development, striving to find innovative solutions. Protecting our intellectual property is essential, and we likewise respect the intellectual property of others.



We use the intellectual property of others only with their permission, obtaining necessary licenses**.

**** Examples of licensed assets:**

- Patent, design or trademark rights owned by third parties
- Software and data protected by copyright or related rights
- Documents, texts, images or other works protected by copyright



► 4.2.5 SELECTING SUPPLIERS RESPONSIBLY

For our business activities, we need to purchase raw materials, packaging materials, technical products, components, and services from reliable suppliers. We work in partnership with our suppliers. Our guidelines for ethical business conduct do not stop at the factory gate. We similarly call on our suppliers to conduct themselves in a way that is both lawful and fair and protects and supports the environment and the communities we operate in. We expect them to comply with our Supplier Code of Conduct and to apply the same social and legal standards we put into practice within the company.



We use fair, transparent processes when selecting our suppliers and contractors, and regularly review our existing relationships based on defined sustainability criteria. Integrity obliges us to keep our promises, which is why we do not tolerate any misconduct, such as corruption, unfair competition, violation of environmental regulations, or substandard working conditions. We take rigorous measures in response to any breaches.



COMMITTING TO OUR PLANET AND COMMUNITY

Within our global business operations, we put the highest emphasis on product safety and sustainability. We are committed to reducing our environmental impact through responsible practices and innovative solutions that protect both the people and the planet. By educating and engaging with society, we aim to raise awareness and promote positive change, ensuring that our actions contribute to a more sustainable and responsible future for all.



For additional details on global governance documents, key programs and tools, topic-specific resources, and other helpful materials related to the upcoming chapters, visit our Code of Conduct intranet page.





**Committing to our
planet and community**

5.1 HOW WE ACT RESPONSIBLY AROUND THE GLOBE	36
5.1.1 Managing responsibilities beyond business	36
5.1.2 Reducing environmental impact	36
5.1.3 Prioritizing product safety	37-38
5.2 HOW WE ENGAGE WITH SOCIETY	39
5.2.1 Adhering to trade control laws	39
5.2.2 Innovating responsibly	39
5.2.3 Representing our company in public	40
5.2.4 Engaging with society transparently	41
5.2.5 Providing accurate public information	41

5.1 HOW WE ACT RESPONSIBLY AROUND THE GLOBE

► 5.1.1 MANAGING RESPONSIBILITIES BEYOND BUSINESS

As a company, we lead by example, actively participating in national and international initiatives and going beyond what is asked of us. Upholding universal standards for protecting people and the environment is a priority we take seriously, as we work to promote sustainable practices worldwide.

Embracing responsibility is integral to who we are. We particularly focus on areas where we have specific expertise due to our business activities: primarily supporting health, culture, and education projects, or providing disaster aid near to our locations and in countries in which we operate.



The company welcomes and supports the efforts of employees who are involved in volunteer work, whether in situations requiring emergency assistance or on an ongoing basis.

► 5.1.2 REDUCING ENVIRONMENTAL IMPACT

Our business activities release emissions into the air and water and generate different types of waste. In addition, we use materials that can adversely affect the environment if not handled properly. We aim to minimize our impact on the environment and have developed strategies to improve our environmental performance. We have set ourselves targets to minimize our resource consumption, such as improving our water efficiency by 50% in 2030 (vs. 2020). This includes making the most efficient use of increasingly scarce resources.



To minimize the negative environmental impact and take meaningful climate action, we set our own high environmental standards at our locations around the world.

Current information and regular communication ensure that our employees know and abide by all regulations, allowing everyone to actively participate in protecting the environment and conserving resources. Together, we can accomplish a lot.



What-If scenario:

What if you could create efficiencies in your material production process but it has a potentially negative impact on the environment?

You should assess the project's environmental risks and ensure alignment with our company's environmental commitments and standards. Be sure to discuss concerns with your supervisor, project team, sponsor, relevant compliance officers and EHS/sustainability experts to explore alternative solutions before going ahead.



► 5.1.3 PRIORITIZING PRODUCT SAFETY (1/2)

A big part of protecting the environment is the **safety*** and **sustainability**** of chemical products.

Chemical products must not harm people or the environment. Therefore, our company-wide standards ensure that we comply with applicable national and international regulations regarding the protection of human health and the environment.

We also strive for chemicals sustainability. Founded on robust product safety assessments (regarding hazard, exposure, and risk) and the use of the latest in-silico tools, we expand our assessment framework by incorporating comprehensive sustainability assessments (such as environmental Life Cycle Assessments).

We conscientiously follow the respective regulations in our markets during importing, manufacturing, marketing, handling, recycling, and disposal of our chemical products. All of this is the starting point of our innovation-driven transition towards safe and sustainable products.



* **Product safety** is providing all required information to ensure the safe use and handling of chemical products.

** **Chemicals sustainability** is transforming our product portfolio towards sustainable and innovative solutions considering all three dimensions of sustainability: environment, society, and economy. One driving force is the EU Chemicals Strategy for Sustainability (CSS).

► 5.1.3 PRIORITIZING PRODUCT SAFETY (2/2)

Safety of healthcare products

Our pharmacovigilance system* ensures that the benefits of our products always outweigh the potential risks. In continuously assessing these benefits, it is crucial that we carefully evaluate any information regarding potential side effects.

If we receive information about potential side effects of our products, for example from patients or doctors, we respond immediately. We forward the information immediately to our responsible local department for patient safety or to our company's dedicated central email address.

We make sure that information on the risks and benefits associated with our products is always up-to-date and available to patients and doctors as part of the summaries of product characteristics and package leaflets.

**What-If scenario:**

What if you attend a dinner party where a guest casually mentions experiencing an adverse event after using one of our Healthcare products. What should you do?

If someone reports an adverse event during a casual setting like a dinner party, you should take the report seriously and follow the appropriate steps to report the adverse event within the required timeframes.



* **Pharmacovigilance** is the ongoing, systematic monitoring of the safety of medicinal products. Our pharmacovigilance system defines processes and structures that ensure that the safety of our products is continually monitored. This also includes ensuring that information relating to the safety of our products is processed as quickly as possible. That is why it is particularly important that we immediately, or at the latest on the next day, transmit the information obtained to our internal responsible department even if we have obtained the information outside the working environment.

5.2. HOW WE ENGAGE WITH SOCIETY

► 5.2.1 ADHERING TO TRADE CONTROL LAWS

We want our efforts to improve the quality of people's lives. At the same time, it is very important to us that our developments and products do not fall into the wrong hands* and are not used in ways that could harm the health and welfare of human beings. For this reason, we strictly comply with all applicable rules on embargoes, trade and financial restrictions.

Our internal control systems ensure that we only supply trustworthy customers.

* Examples of possible misuse by third parties:

We market high-purity chemicals for use in the food and pharmaceutical industries. This product range includes ingredients that can also be misused in the manufacture of chemical weapons.

Microbiological resources that we provide to customers for research purposes could be misused to create biological weapons.

► 5.2.2 INNOVATING RESPONSIBLY

As science and medicine advance, they bring forth profound ethical questions. Expanding our technical capabilities requires us to question not only what is possible, but also what is wise to pursue. The challenge lies in steering our technological progress with a clear moral compass. Can we shape technology to embody positive values that meaningfully improve people's lives?

These questions are particularly important for technology pioneers operating in dynamic technological fields, which are often characterized by regulatory ambiguities and moral complexities. The societal reach of commercially successful innovations demands responsible development and ethical foresight from the lab to the market.

To address these challenges, we have established an internal bioethics team and advisory bodies, staffed with world-renowned external ethics experts. This team tackles pressing bioethics** questions that arise from our businesses and proactively anticipates

emerging challenges in this area. Our scope extends beyond research, encompassing business conduct, environmental and societal impacts, and the long-term effects of our actions on human life and health. We aim to identify opportunities, recognize risks, and evaluate uncertainties to find solutions that benefit all stakeholders.

** **Bioethics** addresses ethical questions related to health as well as broader biotechnological advancements. It examines the ethical implications of research and development across life sciences, biotechnology, and medicine. Key questions include: What ethical principles should guide the development of new technologies to ensure they benefit society without exacerbating inequalities or compromising individual rights? For example, as we develop therapies to treat infertility, bioethics guides us in addressing various ethical issues, including distributive justice, healthcare access, the moral and legal status of embryos, and the impact of novel or disruptive technologies on existing reproductive paradigms.

In our corporate context, bioethics provides us with guiding principles for responsibly navigating the rapidly evolving potential of biological sciences and technologies.



► 5.2.3 REPRESENTING OUR COMPANY IN PUBLIC

We recognize that any employee may be perceived as a representative of our company, in public, in their personal lives, or on their private social media channels.



We only make official statements on behalf of our company when we are authorized to do so. Interactions with the media are the responsibility of the members of our Executive Board, our designated Media Relations spokespersons and official company representatives authorized and accompanied by our spokespersons.

If our personal social media accounts show a connection to our company, we must familiarize ourselves with and adhere to the guidelines set in the Social Media Recommendations for Private Use. We are particularly cautious when it comes to using pictures that include our company's logo in a private context.

When we take part in professional discussions as an employee of our company, whether on digital platforms or at conferences and events,

we communicate responsibly* and express our statements clearly to avoid misunderstandings or misinterpretations.

If we publicly express our views on the company or work-related topics as private individuals, we always clarify that these are our personal opinions and not those of the company.

Our words and actions in public influence how our company is perceived. Our social media recommendations for private use helps to guide how we approach our private channels.

When using Artificial Intelligence (AI) - we make sure we do not mislead people.

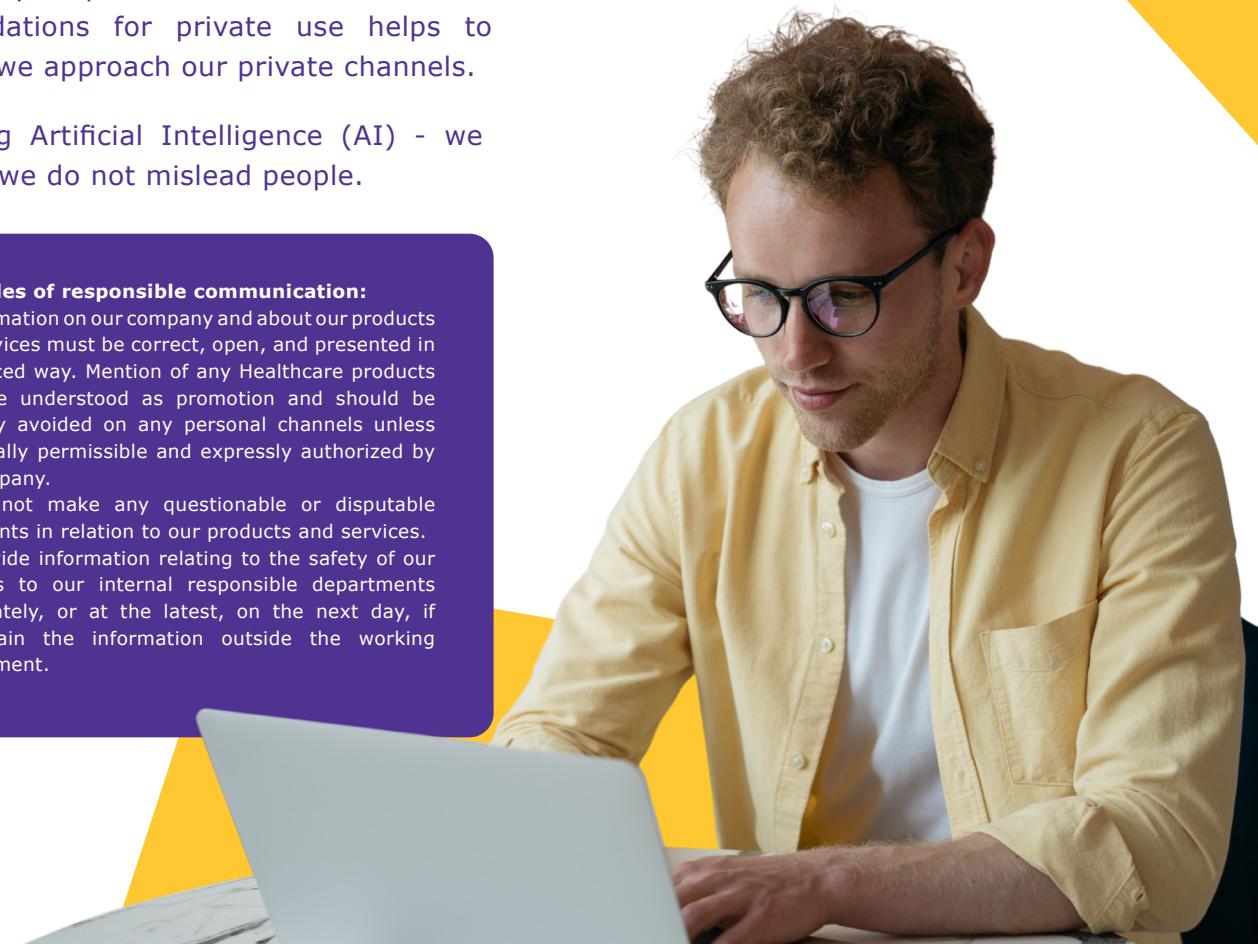
*** Examples of responsible communication:**

- All information on our company and about our products and services must be correct, open, and presented in a balanced way. Mention of any Healthcare products could be understood as promotion and should be explicitly avoided on any personal channels unless it is legally permissible and expressly authorized by the company.
- We do not make any questionable or disputable statements in relation to our products and services.
- We provide information relating to the safety of our products to our internal responsible departments immediately, or at the latest, on the next day, if we obtain the information outside the working environment.



Self-reflection question:

Do you know how to ensure that our personal opinion is not misunderstood as the official position of our company on social networks?



► 5.2.4 ENGAGING WITH SOCIETY TRANSPARENTLY

We foster forward-looking engagement with policymakers, regulators, and stakeholders, ensuring that our innovative solutions are supported by the appropriate rules and regulations.



Through strategic partnerships and informed advocacy, we will drive sustainable growth and contribute to the global dialogue. We strive to create a transparent and collaborative environment that enhances our company's reputation as a responsible corporate citizen, while advocating for science, technological, and healthcare advancements that benefit society.

► 5.2.5 PROVIDING ACCURATE PUBLIC INFORMATION

We publish a wide variety of information – for example, in the media, on social media, on our website, at conferences, as well as in our official communications*.

Our statements are issued by responsible representatives of our company. Many of our employees are involved in collecting data or disseminating information and reports internally. Certain information is included in regular reports, and sometimes we are required to publish reports for legal reasons. We are aware that we need to compile and publish internal reports promptly and accurately, and we must answer all inquiries truthfully, whether from the media or the authorities.

*** Examples of official communications:**

- Annual reports including Sustainability Statement and Statement on Corporate Governance
- Environmental reports for public authorities and stakeholders
- Reports for rating agencies
- Publication of research results
- Reports for industry initiatives
- Press releases about important company events that may have an effect on the share price (ad hoc communications)
- All other press releases and official statements of our company towards journalists
- Social posts or comments via channels of our company



BEING COMPLIANT

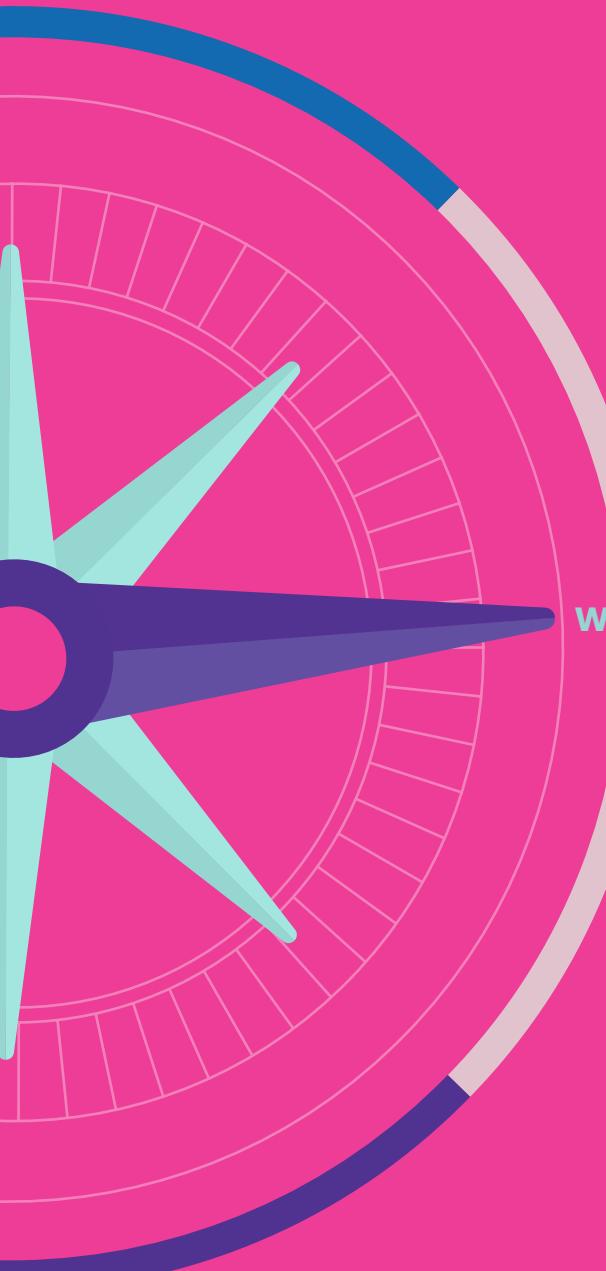
**We are all responsible for implementing
our Code of Conduct**

People – whether employees, customers, patients, external business partners, or fellow citizens – and their needs, are our focus



For additional details on global governance documents, key programs and tools, topic-specific resources, and other helpful materials related to the upcoming chapters, visit our Code of Conduct intranet page.





Being compliant

- 6.1 **WHAT BEING COMPLIANT MEANS TO US** 44
- 6.2 **WHO CAN SUPPORT US** 44
- 6.3 **HOW WE SPEAK UP** 45

► 6.1 WHAT BEING COMPLIANT MEANS TO US

It is everyone's responsibility to uphold our values in everything we do. Our values, this Code of Conduct, and all internal standards are mandatory for everyone. Local requirements and regulations should be considered, especially in locations where stricter rules may apply.



Furthermore, we encourage anyone with questions or uncertainties about this Code to discuss them openly with their manager. Doing so enables us to find solutions together, reinforce our shared values, and strengthen our High-Impact Culture.

***The Code of Conduct** is supplemented by detailed, topic-related governance documents that can guide you through specific circumstances or issues. Comprehensive information together with details of who to contact and central telephone numbers can be found on our intranet page. Further governance documents can also be downloaded there.

► 6.2 WHO CAN SUPPORT US

One of the main responsibilities of every manager is to guide their teams to make sure that compliance remains at the center of our behaviors. We understand the relevance of this task and therefore encourage every employee to collaborate with our Compliance team and rely on their advice.



Our Compliance Program is based upon our Code of Conduct and was designed to support all our employees with their understanding of how our values should be brought to everyday work.

After all, every individual in the company needs to understand what the Code of Conduct* means, how to use it in daily activities, and ensure that we act in accordance with it.



► 6.3 HOW WE SPEAK UP

We remains steadfast in creating an environment that empowers people to speak up, encouraging everyone to confidentially report any possible violations, misconduct, or concerns without fear of retaliation.

The SpeakUp line www.bkms-system.net/ISPEAKUP is available for employees and external stakeholders to report anonymously.



This line, provided by an external service company, adheres to the highest standards of protecting the identity of the reporter and ensuring the security of transmitted information. Available 24/7, the line offers services in all relevant national languages. Our Code of Conduct and governance documents outline fundamental principles, supplemented by further training and open communication to help implement them in daily situations.

In addition to the SpeakUp Line, employees can report compliance-related concerns to the Group Compliance Office, Local Compliance Office, or the Local Compliance Point of Contact. For employment or human resources concerns, employees can also reach out to their supervisor or the HR Department.

When in doubt about decisions or actions, employees are encouraged to seek advice from their supervisors. Employees and managers can also contact Human Resources or relevant

specialist departments at any time. Experts are available to provide support, advice, and concrete measures to minimize business risks. All points of contact can be found on the intranet.

We urge our employees to remain vigilant and report any suspected breaches of internal or external rules, helping us to address shortcomings and prevent errors. Anyone reporting in good faith is protected against retaliation!



STAYING TRUE TO OUR VALUES – TOGETHER

Our Code of Conduct is more than a guidance document— it is a reflection of who we are and what we stand for. Every decision, every action, and every conversation contribute to the High-Impact Culture we build together. Each of us has a responsibility to act with integrity, live our values, and create an environment where we all feel empowered to do the right thing.

If you ever face uncertainty, remember you are not alone. Support is always available — whether from your manager, Compliance, Human Resources, or through our dedicated SpeakUp Line. Let us continue to hold ourselves and each other accountable, working together to build a company we are proud to be part of.

