

Centrient

Code of Conduct



A message from our CEO

We are a global leader with a clear mission; with this comes a responsibility to do the right thing; that's why we have a Code of Conduct.



Dear colleagues,

Centrient Pharmaceuticals ("Centrient") is the global business-to-business leader in sustainable antibiotics, next-generation statins and anti-fungals. More than this, we are a pharmaceutical company with a clear mission: to improve lives by being at the centre of sustainable and accessible healthcare. We promise quality, reliability and sustainability to customers, partners, patients and the world at large. Our common values – **Passion, Accountability, Collaboration, Innovation and Caring** – help define who we are, what we believe, and how we behave.



Our strategic roadmap charts the path forward to a bright and successful future. Together, we will bring Centrient to the next level of success and growth – but we can only do so if we behave in the right way and uphold our values. To this end, and to provide a standard for our employees worldwide, we have developed the Centrient Code of Conduct.

This Code of Conduct reflects our mission and values. It serves as a guidebook for putting our values into practice. Being a leader in business also means being a reliable partner that conducts business with high ethical standards. At all times, we must strive to be a reliable business partner for our customers and business partners, and lead by example.

Please read this Code of Conduct and use it to guide your daily decisions and actions, and to help you with dilemmas. By making the right decisions, we will not only protect our reputation but also strengthen it. If needed, we must be prepared to walk away from a commercial opportunity if it does not meet our standards.

You should also speak up if you have a concern or see something questionable. Seek guidance anytime you are unsure about what is the right thing to do. Each of us plays an important role in maintaining and building the trust of all parties that we interact with and safeguarding our reputation.

Let's continue to be a leader!

Let's also be a leader in doing the right thing!

A handwritten signature in blue ink, which appears to read 'Rex Clements'.

Rex Clements
CEO



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About the Centrient Code of Conduct

The Centrient Code of Conduct defines what we stand for at Centrient. The Code underpins how we do the things we do. It provides an overview of the laws, regulations and company policies that apply to us and the work we do. We follow our Code in all countries where we do business, even in markets in which the rules may be less strict. The Code reflects our full commitment to doing the right thing.

The Code applies to all employees working for Centrient regardless of location, role or level of seniority. Temporary and contract employees, consultants, agents and other parties that work on behalf of Centrient must also follow the Code. We also expect our business partners (suppliers, agents, distributors, contract manufacturers and other partners) to follow the principles of the Code.

It is important that everyone within Centrient commits to the principles as set out in the Code of Conduct on an annual basis. By signing off on these principles, we make clear that we will adhere to the Code and that we make good decisions based on the Code. It also shows our customers and business partners that they can rely on us to do the right thing, year after year.

The principles as outlined in the Code are:

We obey laws and regulations

We SpeakUp to stop or prevent misconduct

We put safety first

We are committed to protecting the environment

We conduct business in a fair, responsible and honest way

We keep accurate and complete records

We recognise people's fundamental rights

We promote a diverse, inclusive and respectful workplace

We support the principles of continuous improvement

We safeguard Centrient's assets and proprietary information



Centrient Value: Passion



Passion

We achieve our goals by displaying a positive, can-do attitude and going the extra mile to ensure excellence in everything we do. We show resilience and grit to deliver on our promises with the highest level of quality.

We obey laws and regulations

We SpeakUp to stop or prevent misconduct

The Code of Conduct reflects our high standard

The Centrient Code of Conduct sets out a clear standard of conduct. We are passionate about following the Code and we live up to this standard. We ensure excellence in everything we do, and we do the right thing. Always!

The Centrient Code of Conduct provides guidance for many situations, but no document can anticipate every situation. In other words, not all the answers can be found in this Code and we should always use common sense. We are sometimes faced with a situation in which there is no immediate answer. If you are unsure what to do, you should stop and ask yourself the following questions:

- Is the action legal?
- Does the action comply with our values and the Code?
- Will the action allow us to maintain the trust of all our stakeholders, if made public?
- Will the action reinforce Centrient's reputation as an ethical company?

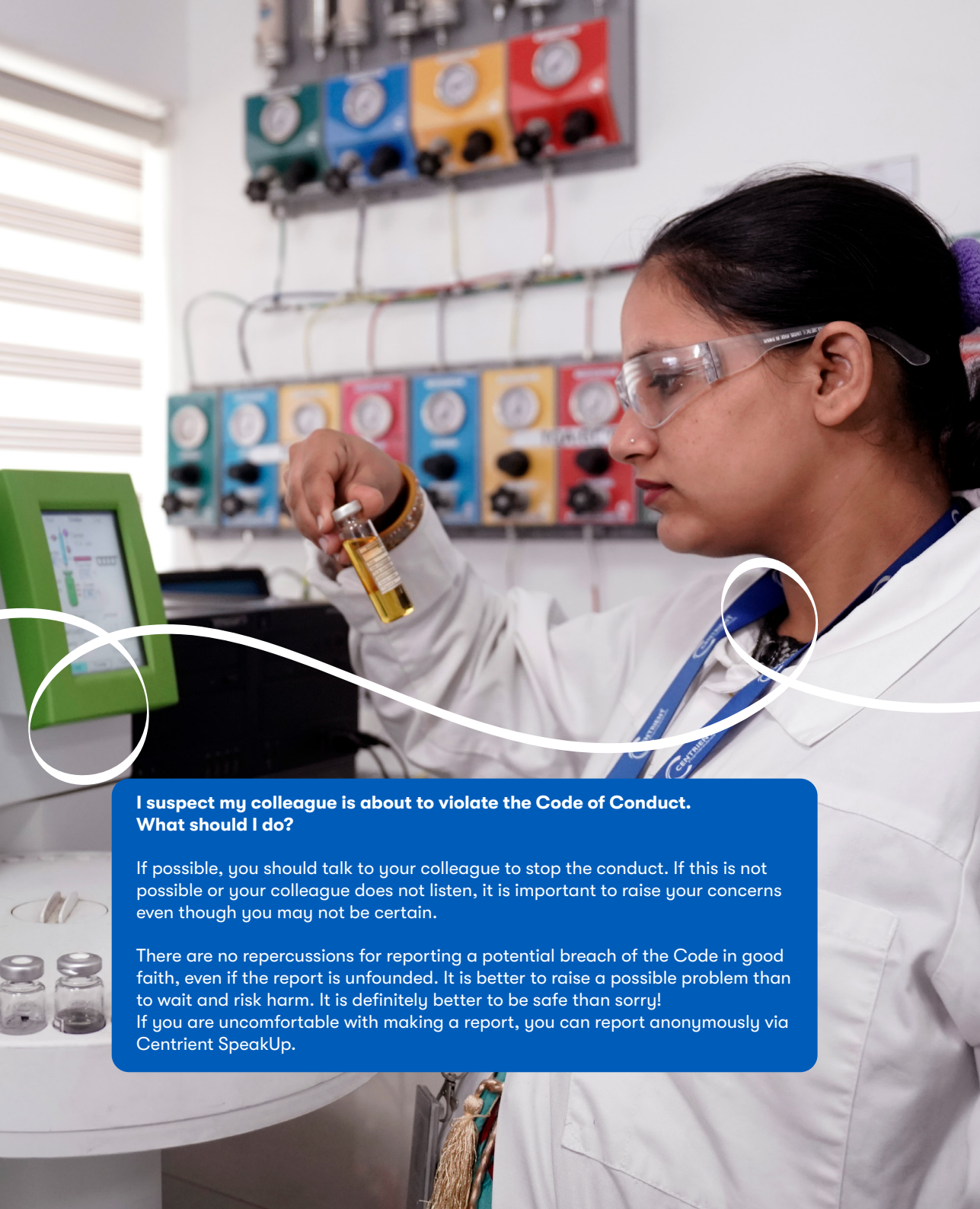
If you cannot answer "yes" to all these questions, you should ask for help and SpeakUp.

SpeakUp



SpeakUp

If you think our Code is being, or is about to be, breached, you should take action. Sometimes it is easier to look the other way or let someone else raise the issue, but you should always show leadership and SpeakUp so the conduct can be stopped and, if needed, the matter can be investigated. We are all responsible for reporting violations of the Centrient Code of Conduct.



**I suspect my colleague is about to violate the Code of Conduct.
What should I do?**

If possible, you should talk to your colleague to stop the conduct. If this is not possible or your colleague does not listen, it is important to raise your concerns even though you may not be certain.

There are no repercussions for reporting a potential breach of the Code in good faith, even if the report is unfounded. It is better to raise a possible problem than to wait and risk harm. It is definitely better to be safe than sorry!

If you are uncomfortable with making a report, you can report anonymously via Centrient SpeakUp.

Always remember that your question or concern is important to Centrient and will be taken seriously. You will be listened to. You can report your concerns or questions through any of the following channels:

- Your manager
- Any member of Centrient Legal Affairs
- Global Risk and Compliance Director
- Email: alert@centrient.com
- Centrient SpeakUp hotline or website
<http://centrient.ethicspoint.com>

You can call or submit a report anonymously through the Centrient SpeakUp hotline or website, which is hosted by a third party.

The Centrient SpeakUp hotline is available 24 hours a day, seven days a week. Toll-free telephone numbers for five countries are available on Centrient's SpeakUp website. Operators are available to listen to your concerns, in your local language if needed.

We do NOT retaliate!

What is retaliation?

Punishing an employee for raising a complaint in good faith. It includes any negative job action, such as demotion, discipline, firing, salary reduction, or job or shift reassignment.

You can raise concerns or questions without fear of retaliation or impact on your employment. Centrient does not tolerate any form of retaliation against any person who raises a concern under this Code in good faith or who participates in any investigation conducted internally or by an authority. Any employee who engages in retaliation will face disciplinary action.

You can find further guidance in the Centrient's Whistleblower Policy.

Disciplinary actions in case of violations

Everyone who works for Centrient (including contractors) must comply with the Code. Violation of this Code is a serious matter and may lead to disciplinary action, including dismissal. If you see any breaches, raise them immediately and SpeakUp.



Centrient Value: Accountability



Accountability

We act responsibly and take complete ownership of our actions and results in our respective work areas. We make informed decisions with speed, to always meet our commitments.

We conduct our business in a fair, responsible and honest way
We keep accurate and complete records

Compliance with anti-bribery and corruption laws: We conduct business in a fair and honest way, and we have a zero-tolerance approach to bribery and corruption.

We never offer, give, request or accept bribes or any other type of improper preferential benefit to anyone, whether they are a government or party official, political candidate, business partner or employee. We must not allow any third party, including agents, distributors, contractors or advisers to do so on Centrient's behalf. In view of this, we ensure that any commission payment, agent fee, etc is based on a real, legitimate documented service. We do not make facilitation payments.

You can find further guidance in Centrient's Global Anti-Bribery and Corruption Compliance Policy and Manual.

What are facilitation payments?

Small payments to government officials to secure or speed up routine governmental actions

I receive a gift from a customer. Can I accept?

Remember that gifts may also constitute a bribe or another type of unlawful benefit. Gifts should be of modest value. Gifts should be reasonable, proportionate and appropriate to the relevant circumstances and should not be given to you in return for favourable treatment or to gain a business advantage. Similar rules apply to hospitality and charitable donations. In case of doubt, please ask for legal advice.

Avoidance of conflicts of interest: We each have a responsibility to act in Centrient's best interests and we understand that our personal interests must not influence our business decisions. We avoid these conflicts of interest and we avoid any behaviour that may appear to influence our professional judgment. We separate professional, personal and political interests. As a company, we do not provide financial or other support to political parties.

A friend is offering her company's products. Can I purchase the products?

It is important to avoid any real or perceived conflict of interest as this can harm Centrient and you personally. Centrient can only purchase the products if there has been a fair and transparent procurement process, the decision was approved by management and not influenced whatsoever by your personal interests. So you should not be involved in the procurement process.

Trade compliance: We conduct import and export transactions every day and, because of that, we must ensure compliance with all trade controls applicable to our business. We follow our own strict rules and procedures. We provide accurate and truthful information about our business to Customs and other relevant authorities.

You can find further guidance in Centrient's Trade Controls Policy.

Fair competition: We strongly believe in fair competition. We compete based on the quality and merit of our products. We do not enter into anti-competitive agreements and practices with competitors to fix prices, divide markets, limit volumes or abuse a possible dominant position. We comply with laws designed to protect competition.

You can find further guidance in Centrient's Global Competition Law Compliance Policy and Manual.

At a trade show, I meet a former colleague who now works for one of Centrient's competitors. He asks me how business is going. What can I say?

There is no problem in responding in a very general way without disclosing specific details. However, it is advisable to steer the conversation in another direction to avoid a discussion on more detailed topics that can pose problems. Also, be aware that having a business conversation with a competitor can give the appearance of something improper.

Avoidance of fraud: We do not engage in any kind of fraud against Centrient, any of our business partners or government entities. We are alert to threats of fraud, and we have a set of detailed business controls in place to prevent and detect fraud. We adhere to anti-money laundering laws to prevent any use of the company's resources to conceal crimes.

We follow internal approval processes to ensure we properly record all transactions. We will immediately report any irregular or unusual methods of payments, refund requests, or other suspicious transactions or activities to a member of the Finance Department and/or Legal Affairs.

What are anti-money laundering laws about?

They prohibit the receipt of proceeds which come from criminal activities by third parties.

I saw a co-worker sign off on an inspection record although he hadn't actually done the inspection. What should I do?

You should immediately report this type of behaviour to your manager or Legal Affairs as this qualifies as a form of falsifying records, which is against our Code.

Protection of personal data: We respect the privacy of our employees, customers and business partners. We follow relevant laws and our privacy rules. We handle personal information with great care. We only collect, use, share and retain personal data for legitimate business purposes, and we implement measures designed to protect that data.

You can find further guidance in Centrient's Global Privacy Policy.

My brother has asked me for the contact details of my colleagues. He wants to promote his new company and wishes to add my colleagues to his business mailing list. I would like to help him out. My colleagues would probably be interested in his services. Can I go ahead and send my brother the names and email addresses of my colleagues?

No, this would be against the Centrient Code of Conduct. You may only process personal data for legitimate Centrient business purposes. Your brother will have to find another way to promote his business.





Centrient Value: Collaboration



Collaboration

We trust and respect each other, and continuously work together cohesively to achieve the company's goals. We act in a seamless manner, creating an inclusive organisation.

We recognise people's fundamental rights

We promote a diverse, inclusive and respectful workplace

Human rights: We support and respect the rights of individuals and adhere to the employment laws in the countries where we operate. We adhere to internationally recognised human rights as outlined in the United Nations Universal Declaration of Human Rights and the core conventions of the International Labour Organisation.

Under no circumstances will we accept and make use of forced, bonded labour, involuntary prison labour or child labour. We expect our business partners to commit to the same high standards.



Be alert and SpeakUp if you see or suspect a possible human rights or employment law violation!

Equal opportunities: We strive for a diverse and inclusive workforce. We recruit, employ, develop, reward and promote employees on the basis of their talents, qualifications and abilities. We do not tolerate discrimination on the basis of race, culture, nationality, age, religion, gender, pregnancy, sexual orientation, association, disability or any other protected status.

There is a vacancy in my company and my niece wants to apply. Is that okay?

It depends. Your niece must follow the same recruitment process as any other candidate and can only be hired if there has been a fair and transparent recruitment process and decision, which was approved by management and not influenced by any personal interests.

Anti-harassment: We collaborate and, in doing so, will treat people with respect. This means we will always show respect for our colleagues and others. We do not tolerate conduct that creates an intimidating, offensive or hostile work environment for any person or group of persons. We do not accept harassment of any kind; we take all allegations of harassment seriously and we will act upon misconduct.

My supervisor often loses his temper and insults me and members in my team. Is that harassment?

Yes, the behaviour of your supervisor is offensive and inappropriate. This type of behaviour is not acceptable and is against our Code of Conduct. We are committed to maintaining a professional work environment in which employees are treated with dignity and respect, and therefore you should SpeakUp. If you are uncomfortable talking directly to your supervisor, please contact HR for advice.

Freedom of opinion, speech and association: We respect individual rights to freedom of opinion, speech and association, provided that local law is respected. We encourage open communication and direct engagement with employees to resolve workplace and compensation issues.

Business partners: We wish to do business with reliable business partners whose ethical standards are equivalent to ours. We expect our Suppliers to confirm that they conduct their business in accordance with the Supplier Code of Conduct. We expect our agents, distributors, contract manufacturers and other business partners to confirm in writing that they will conduct their business in accordance with the Centrient Code of Conduct.





Centrient Value: Innovation



Innovation

We think outside the box and drive continuous improvement, creating new possibilities and finding creative solutions to proactively seize opportunities and address challenges.

We support the principles of continuous improvement We safeguard Centrient's assets and proprietary information

Continuous improvement: We evaluate and improve our products, working systems, production processes and services on a continuous basis. We are committed to ensuring quality, reliability and sustainability to customers, partners, patients and the world at large.

We go beyond essential manufacturing and logistics compliance by applying rigorous external and internal standards for quality and by swiftly addressing customer queries and complaints.

Protection of confidential information: We realise our intellectual property (IP) and confidential information are key drivers for our success. It is important we secure and protect them against unauthorised disclosure. We respect the IP of others and only use confidential information provided to us when we have express permission to do so. You can find further guidance in Centrient's IP Protection Policy.

I am recruiting a new team member and one of the preferred candidates works for one of Centrient's competitors. He probably knows a lot about their R&D plans. Can I hire him?

Yes, we can hire this candidate but only for the right reasons (such as expertise) and as long as the candidate is not under a non-compete obligation. You cannot hire with the expectation that the candidate will reveal the competitor's confidential or proprietary information once on board. It is your duty to take steps so we do not obtain that information.

Protection of company assets: We rely on Centrient's assets to support our work every day. We are all good stewards of these assets in all their forms, which include IT hardware, software and data. We take good care to use assets and resources for their intended business purpose and not lose, damage or misuse them. You can find further guidance in Centrient's Code of Conduct for Information Security.

Professional communication: We act professionally in our communication. We take care in our business communications and we communicate in an open, factual and timely way. Every communication to the public must be accurate, complete, relevant, balanced and in compliance with all applicable laws and regulations.

We refer media enquiries to people who are authorised to speak on behalf of Centrient. We use discretion and common sense when we use personal social media for business purposes. You can find further guidance in Centrient's Social Media Policy.



Centrient Value: Caring

Caring

We care for people and planet while fulfilling our promise of creating value for our employees, communities, customers, patients and all other stakeholders. We are highly focused on sustainability and strive to create a safe and healthy environment for everybody.



We put safety first

We are committed to protecting the environment

Workplace safety and health: We seriously believe that work can never be more important than (personal) safety. We are all responsible for ensuring safety and health for ourselves and others around us at our workplace and during work assignments when outside. We make ourselves aware of all applicable safety standards and critical practice (including Life-Saving Rules) and follow them at all times.

We speak out to each other on safe and unsafe behaviour. We report all incidents and dangerous situations to continuously improve our safety performance. We help each other learn from incidents. These behaviours will help us to ensure that we all return home from work safely!

You can find further guidance in Centrient's SHE Requirements.

My team is behind schedule in a project and we found ways to speed up the production process by skipping a few safety procedures. We are sure that the process remains safe. Can we skip these steps as long as we are careful?

No! Never! Safety procedures are implemented to ensure that you and your team keep safe and to protect the quality of our APIs. Skipping safety procedures is never allowed. Speak with your line manager and/or SHE manager to discuss how to best handle the project in a safe and compliant way.

Centrient's Life Saving Rules: We commit to 12 Life-Saving Rules that protect ourselves at work. We must always stop the work if conditions or behaviour are unsafe. Some behaviours we do not tolerate because they can bring serious danger to you, your colleagues or any visitors to our sites. We apply zero tolerance to violations of the Life-Saving Rules.

1. No drugs while working; only smoke in designated areas; no alcohol at work
2. Work with a valid work permit, when required
3. Test the quality of the internal atmosphere before entering a confined space
4. Lock out, tag out and try out (LoToTo) before starting work on machines or equipment
5. Obtain authorisation before line breaking
6. Obtain authorisation before overriding or disabling safety-critical equipment
7. Protect yourself against a fall when working at height
8. Lifting and hoisting; do not enter a danger zone where objects can fall
9. Comply with management of change when required
10. Follow your journey management plan
11. Wear your seatbelt
12. Drive responsibly and comply with local laws. Do not use your mobile phone while driving (not even hands-free) and do not exceed speed limits. Avoid drinking and driving, always respect legal thresholds

I suspect that my manager who is a warehouse supervisor is addicted to drugs. What should I do?

Never compromise when it comes to safety. You need to protect yourself, your team and your manager. Share your concerns with HR to address the issue so that your manager gets support from the company.

Product safety: We apply strict regulatory compliance to our products, protecting people from exposure to hazards. We manage hazardous substances in a safe way. We label products properly and communicate product-handling requirements in accordance with applicable laws and our company policies.

We ensure that up-to-date material safety data sheets (SDS) are made available to customers and that SDS or a relevant selection of information from the SDS is made available to other parties involved in storage, handling, transportation and discharge of our products.

You can find further guidance in Centrient's SHE Requirements.

Patient safety: We manufacture our active pharmaceutical ingredients (APIs) and finish dosages forms (FDF) in a current Good Manufacturing Practices (cGMP)-controlled environment. Our enzymatic molecules used in the production of our APIs undergo extensive testing and clinical studies before being integrated into our products.

If issues arise, we have measures in place to ensure an immediate, effective response. We have written procedures in place that specify responsibilities and necessary actions in the unlikely event of a product recall situation.

You can find further guidance in Centrient's Quality Manual.

Environmental impact: We take our environmental responsibilities extremely seriously. We identify and manage the risk and environmental impact during our production processes as well as during our products' lifecycle.

We work hard to minimise the environmental impact of our operations, driving process efficiency, cutting down waste and reducing our energy consumption. And we set ourselves improvement targets for emissions and waste and we strive to meet those targets.

Our ultimate goal is to make our entire value chain cleaner, more energy efficient and less wasteful.

Sustainable procurement: We have high standards on sustainability, not just for ourselves but also for our suppliers. We are trained to carefully screen potential new vendors and continuously review existing suppliers on their sustainability performance. We expect that our partners adhere to the terms of our Supplier Sustainability Programme, which covers sustainable procurement, safety, health, environment, labour and fair business practices.

We joined forces with other pharmaceutical and healthcare companies in the Pharmaceutical Supply Chain Initiative (PSCI) to promote responsible supply chain management and better business conditions across the industry.

Our responsibility to drive sustainability doesn't end with our operations and processes.

Sustainable antibiotics: We promote the responsible manufacturing and use of antibiotics. We have dedicated wastewater treatment facilities in place across our global production sites as well as advanced residual antibiotic content testing to ensure effluent does not contribute to antimicrobial resistance.

We are paving the way for sustainable antibiotics and are a leading advocate of clean production practices.

Animal welfare: We are committed to safeguarding animal welfare. Animals shall be treated humanely, with pain and stress minimised. Animal testing should be performed after consideration to replace animals, to reduce the number of animals used, or to refine procedures to minimise distress. Alternatives should be used wherever these are scientifically valid and acceptable to regulators.



Centrient Code of Conduct

Our Values and our Code underpin everything we do

We follow the laws and our Code

We SpeakUp in case of misconduct

We do the right thing!



I agree to commit to the principles as set out in this Code of Conduct.

Signature employee:

Date of signing: