

Code of Conduct

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Preface

Dear employees and colleagues,

Acting professionally, responsibly, with integrity, and in an ethically correct and lawful manner is as important to the success of SERB Pharmaceuticals as our innovative spirit, quality standards and customer interactions. The reputation that we have established with our customers, shareholders, business partners and broader stakeholders can be easily damaged by individual legal or ethical violations. As a result, each of us are required to act in accordance with the law, and to behave in a responsible manner.

This Code of Conduct (the “Code”) defines the ethical and legal framework within which we act. It sets out the fundamental principles of our conduct within SERB among employees and in our interactions with customers, business partners, and authorities. It presents the principles of our corporate actions and is an expression of our corporate values.

Our Code helps ensure that we make patients our priority, act with integrity and accountability, work as a team, and look for better ways forward. It also helps ensure that we deliver on our purpose and vision via sustainable business practices, implemented ethically and respectfully of diversity. In our everyday business, the Code helps determine the correct and appropriate answers to the ethical and legal issues that arise as we consider options and make decisions.

Our principles of conduct constitute an essential benchmark for each employee’s actions. These principles do not relieve anyone from their personal responsibility. However, we ask all employees to request advice and help when faced with decisions on ethical or legal issues or when they become aware of conduct contrary to our values and principles in their work environment. The Chief Compliance Officer, Wahib Geagea (wahib.geagea@serb.com) acts as a link between law, conscience and culture.

All employees are required to apply these principles of conduct every day at SERB and in their relations with their colleagues and external parties.

Vanessa Wolfeler
CEO

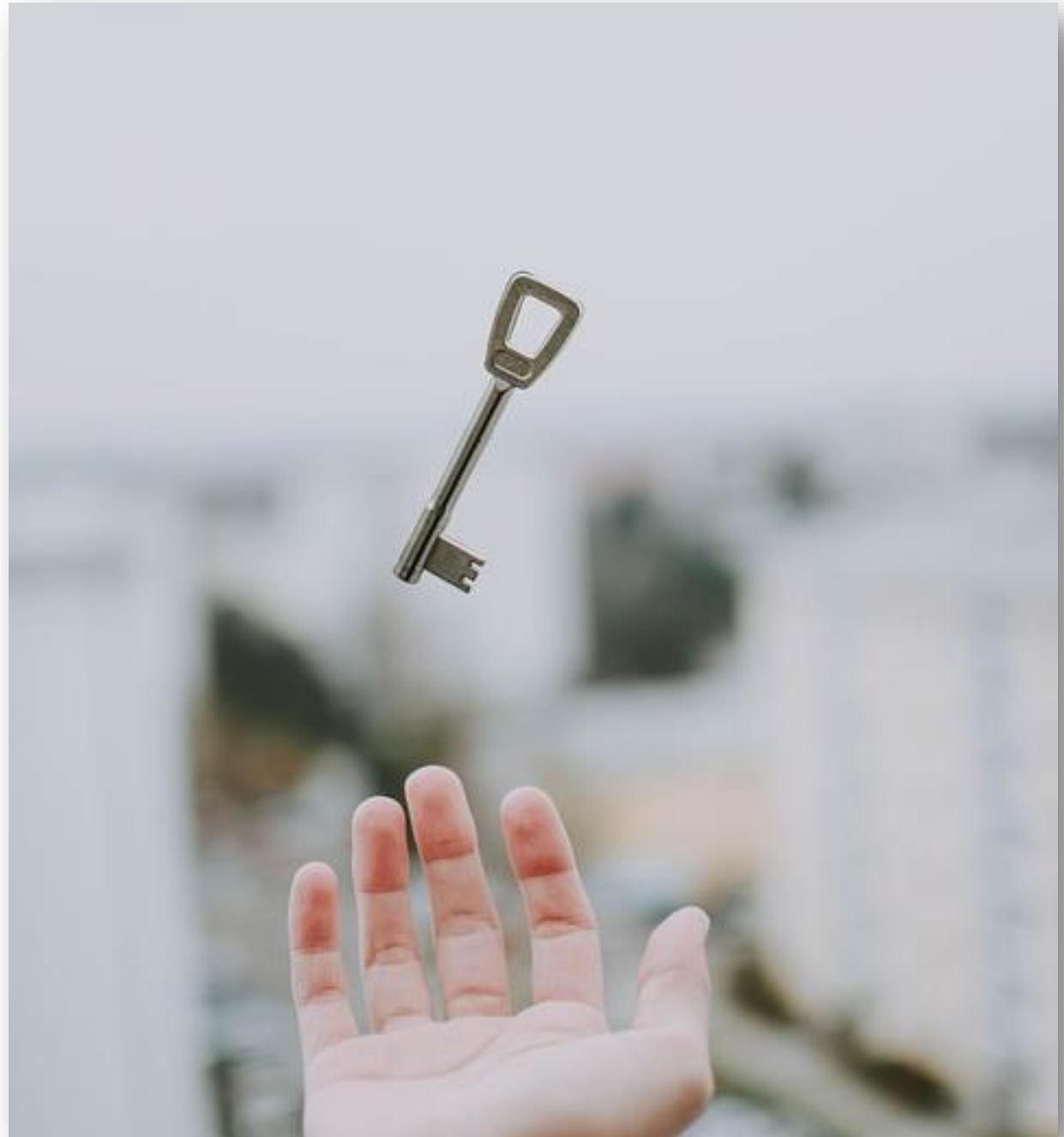
Jérémie Urbain
Chairman

Scope

The principles of conduct set out in this Code are binding on all persons performing work within SERB Pharmaceuticals, its entities, subsidiaries, and affiliates (SERB). This obligation exists reciprocally between SERB and each individual employee. Every employee has a duty to comply with the rules of the Code and can expect SERB to comply with all the rules of the Code with respect to employees.

The rules of conduct apply uniformly throughout SERB. All of our subsidiaries must, where necessary, adapt the Code's principles to reflect national legal and regulatory obligations while ensuring that the fundamental principles of the Code are upheld. The principles set out in the Code are intended to be widely disseminated and promoted within the company.

Companies and individuals in business relations with SERB are also required to adhere to all applicable laws, regulations, governance and ethics rules.



Rules of Conduct in Detail

I. Working with customers, suppliers and business partners

SERB's business relations with customers, suppliers and business partners are determined by ethical and responsible conduct.

SERB acts in an open, honest and ethical manner.

Our actions are always characterised by fairness, good faith and integrity. SERB upholds this in its communications and respects its commitments. We expect the same from all employees and from everyone we do business with.



1. No conflicts of interest

- A conflict of interest may arise when the personal interests of an employee, or the people and entities with whom they are linked, conflict, or are likely to conflict, with the interests of SERB.
- SERB does not maintain inappropriate relations with customers, suppliers or competitors that might influence its decisions to avoid any actual or potential conflicts.
- Employees undertake to avoid any conflicts between their private interests and those of SERB. Thus, decisions made should not be influenced by private interests or personal relationships. Business relationships with customers, suppliers and more generally any business partner are based on objective criteria such as price, quality, competence, reputation, experience, financial stability or the existence of fair cooperation arising from past collaboration.
- Business relations from which purely personal, material or other benefits could be derived shall not influence the signing of a contract or the continuation or termination of a business relationship. Such behaviour constitutes corruption and is also likely to violate competition law, pharmaceutical law in relation to the engagement of HCPs, and professional and industry codes such as LEEM, ABPI and EFPIA.

Example of a conflict of interest:

You are in charge of selecting a new technical design office for your company's needs. Your brother has just created such an office and you decide to select it without first launching a tender procedure.

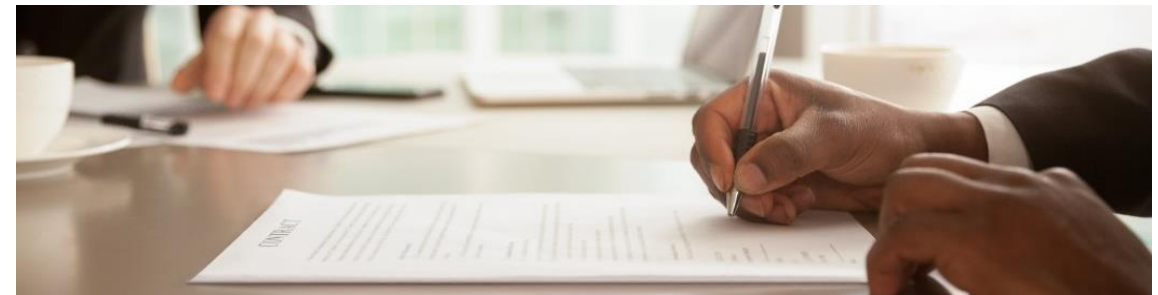
- SERB recognizes that its employees may engage in voluntary activities, if compatible with their obligations towards SERB in accordance with their employment contract, and if they do not create a potential conflict of interest.
- When expressing a personal opinion publicly, including on the Internet, employees must be vigilant, indicate that they are only expressing their own opinion and not give the impression that this represents the position of SERB.
- If an employee faces an actual or potential conflict of interest, they must immediately notify their line manager and/or the Chief Compliance Officer in order to resolve this conflict jointly and find a solution.

2. No dependencies

- Decisions taken by SERB are taken freely and independently, without allowing the development of dependencies. We do not accept preferential treatment by suppliers, service providers or customers. Material or moral dependencies must not play any part in our dealings with business partners.
- SERB employees must only accept invitations from business partners to business events or meals when these have a demonstrable business purpose. The invitation must not go beyond the standards of ordinary hospitality. Any suggestion of a “you scratch my back and I’ll scratch yours” arrangement must be rejected.
- Gifts or invitations to special events (i.e. sports or artistic events) from business partners must be within legal limits and be appropriate in terms of type and extent. In case of doubt, the employee concerned may request an opinion from the Chief Compliance Officer.
- When the value of the gift or invitation to an event exceeds 60 Euros excluding VAT, or the equivalent in local currency, the employee must obtain the authorisation of their supervisor or the Chief Compliance Officer.

3. Fair competition

- SERB respects the rules of free competition, free pricing and free markets and condemns any anti-competitive agreement and any abuse of a dominant position. Every employee of SERB is aware of and complies with the rules of fair competition.
- Wherever SERB operates, it adheres to antitrust and commercial laws, laws on pricing, competition and consumer protection. During their business activities with customers, suppliers and competitors, SERB employees must always act within the limits permitted by law. This means they may neither engage in price fixing, nor come to secret agreements about production, supply or the sharing of markets at the level of geographical areas, products or customers. SERB employees may not participate in unfair trading practices.
- SERB does not tolerate illegal agreements with competitors. Moreover, the appearance of improper agreements with other market participants must be avoided. If in doubt, the Chief Compliance Officer should be consulted immediately.



4. Fight against corruption

Corruption can take two forms, active or passive, both equally reprehensible.

Corruption is not limited to the public sector and is also punishable if it occurs in the private sector.

Corruption is characterised by two elements:

- An act of corruption consisting of soliciting, proposing, granting, giving or accepting an offer, a promise or a benefit of any kind;
- A specific purpose aimed at causing the "corrupt" to perform or refrain from performing an act related to their function.

- Active corruption is characterised by offering to a person, whether in the public or private sector, offers, promises, donations, gifts or benefits of any kind (financial or not), for himself or for others, in order to (i) perform or refrain from performing an act within the scope of his function or mission, in violation of his legal, contractual or professional obligations or (ii) obtain or retain a commercial, contractual, regulatory or personal advantage. As regards persons holding public function, any benefit provided to such a person in relation to their function may be viewed as corruption.
- Passive corruption consists of receiving or accepting, under the same conditions, any advantage.
- SERB is committed to maintaining complete integrity in the normal course of business and social activities. Decisions about business dealings with business partners are based exclusively on facts that can be objectively evaluated, such as quality, price and performance. They will not be promoted by gifts, donations, sums of money ("bribes") or any other act of corruption. Employees must comply with the principles of honesty and integrity in all business and social activities.
- SERB condemns all forms of corruption within its companies wherever it operates. Relationship management is part of business success. It is conducted neither in legal grey areas nor using inadmissible means. SERB employees do not accept bribery or any benefit whatsoever, directly or indirectly, nor do they make any such offers themselves. Bribery in business transactions and towards public officials or with other private operators, is a criminal offence punishable by significant fines and prison sentences. When dealing with government offices, other public authorities or other private operators, no payments or benefits to be promised or granted to influence the decisions made by public servants or other office holders in favour of SERB are permissible.
- International regulations are particularly severe for benefits to public officials. Punishable offenses include so-called "relationship maintenance" e. g. securing the favour of the public official in the performance of their duties.

5. Fight against corruption

Examples of acts of corruption:

- Example 1: In the context of a call for tenders, a SERB employee offers tickets for a major sporting event to the individual in charge of deciding the tender outcome, on condition that SERB is chosen.

The employee commits a crime because they make this offer in order to obtain a commercial and contractual advantage. SERB can also be considered as having committed a felony, because the offer was made to obtain orders. Accepting the offer could also be a felony for the beneficiary.

- Example 2: A supplier hires the son or daughter of a SERB employee and specifies that, in return, they expect the employee to exercise their influence to ensure that the supplier continues to work with SERB.

For a supplier, it is a criminal offence to make an offer of this nature. It would also be an offence for the employee to accept this offer, as they would only do so to obtain a personal benefit.

SERB provides employees with a dedicated policy on anti-bribery and anti-corruption. This policy describes the relevant laws and regulations and offers specific guidance to reduce the risk of bribery and corruption occurring in our ongoing business activities.. This policy is available to all employees via the Compliance & Risk section of the Hub, our Intranet.

In case of doubt in any transaction, it is preferable to abstain and immediately consult the Chief Compliance Officer.



6. Fight against influence peddling

- Influence peddling aims to solicit a person, directly or indirectly, to abuse his influence in order to obtain distinctions, jobs, contracts or any other favourable decision from a public authority or administration.
- Influence peddling is an offence like corruption. The main difference lies in its purpose: the person or entity to whom the benefit is granted is not the one who performs the desired act but exerts its influence to achieve the desired result. The fact that the influence has not produced the expected results is not evasive of criminal responsibility.
- SERB does not make any gifts or grant any benefits to inappropriately influence its position in the market. SERB does not accept any gifts intended to influence the awarding of contracts or a specific behaviour. Gifts or benefits which may influence decisions in favour of the company are impermissible and must neither be offered, granted, requested, nor accepted. This especially applies to offers and acts intended to initiate contracts and the conclusion of business deals.

Illustration of influence peddling:

Asking the spouse of an elected official to use their influence on the latter to obtain an administrative authorisation in exchange for a vacation abroad for their family.



7. Charitable giving and sponsorship

- As a responsible member of society, SERB may make donations of money and donations in kind for educational, health, cultural, social and sports purposes. Any such donations are always transparent. The recipient of the donation and the purpose must be known and clear.
- Donations to individuals, private accounts, organisations operating for profit, organisations pursuing a purpose that is not aligned with our purpose or ESG goals, and/or donations that damage the reputation of SERB are prohibited.
- Political donations are prohibited; this applies equally to individuals, parties or other political organisations.
- SERB can make contributions in the form of money or in kind to an event organised by a third party. Where the services provided are connected in the form of advertising or customer loyalty measures, this is referred to as “sponsorship”. Sponsorship must be approved following the appropriate internal process.

8. Respecting economic sanctions and export controls

- SERB complies with all applicable trade sanctions regulations (“Sanctions”) in the countries in which we operate. The Company, the Board of Directors and its management are committed to complying with all laws.
- Any employee who violates these rules or who permits anyone to violate those rules may be subject to disciplinary action, up to and including dismissal and may be subject to personal civil or criminal penalties.

What do we mean by sanctions?

Sanctions are the regulatory restrictions applicable to dealings with certain countries/territories, governments, groups, entities, individuals or controlled goods or services. They are typically imposed by supra-national organisations such as the United Nations or the European Union, but also by governments (notably the US and the UK).

The nature and extent of these restrictions vary widely (i.e., limitations on import/export, controls on specific goods and services, restrictions on financial operations etc.) and it is important that all Company employees consult with the Chief Legal and Compliance Officers to understand the business implications in cases of doubt.

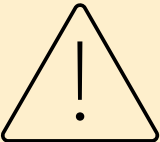
8. Respecting sanctions and export controls (continued)

The most common Sanctions are restrictions on dealings with certain territories, as listed below:

“Sanctioned” Countries*

	Belarus	For these territories the SERB group cannot conduct business nor have any dealings
	Crimean Peninsula	
	Cuba	
	Donbass Region	
	Donetsk People’s Republic	
	Iran	
	Luhansk People’s Republic	
	North Korea	
	Russia	
	Syria	

“Sensitive” Countries*

	Balkans	For these countries the SERB group may in certain circumstances conduct business or have dealings but solely with prior written approval of both the applicable Chief Commercial Officer and Chief Compliance Officer and following a satisfactory specific KYC (Know Your Customer) process managed by the Compliance department
	Burma	
	Burundi	
	Central African Republic	
	Democratic Republic of Congo	
	Iraq	
	Lebanon	
	Libya	
	Somalia	
	South Sudan	
	Sudan	
	Venezuela	
	Yemen	
	Zimbabwe	

What does this mean for SERB employees?

- Each SERB employee is responsible for familiarising themselves and complying with SERB’s policies and legal guidance documents and for respecting all sanctions and export controls applicable to the SERB entity for whom they work.
- For business transactions involving sanctioned and sensitive countries, products or services, each employee must seek prior written approval from applicable the Chief Commercial and Chief Compliance Officers.
- If an employee has a concern about a possible sanction or export control risk, they should notify the Chief Compliance Officer immediately.

What does this mean for our business partners?

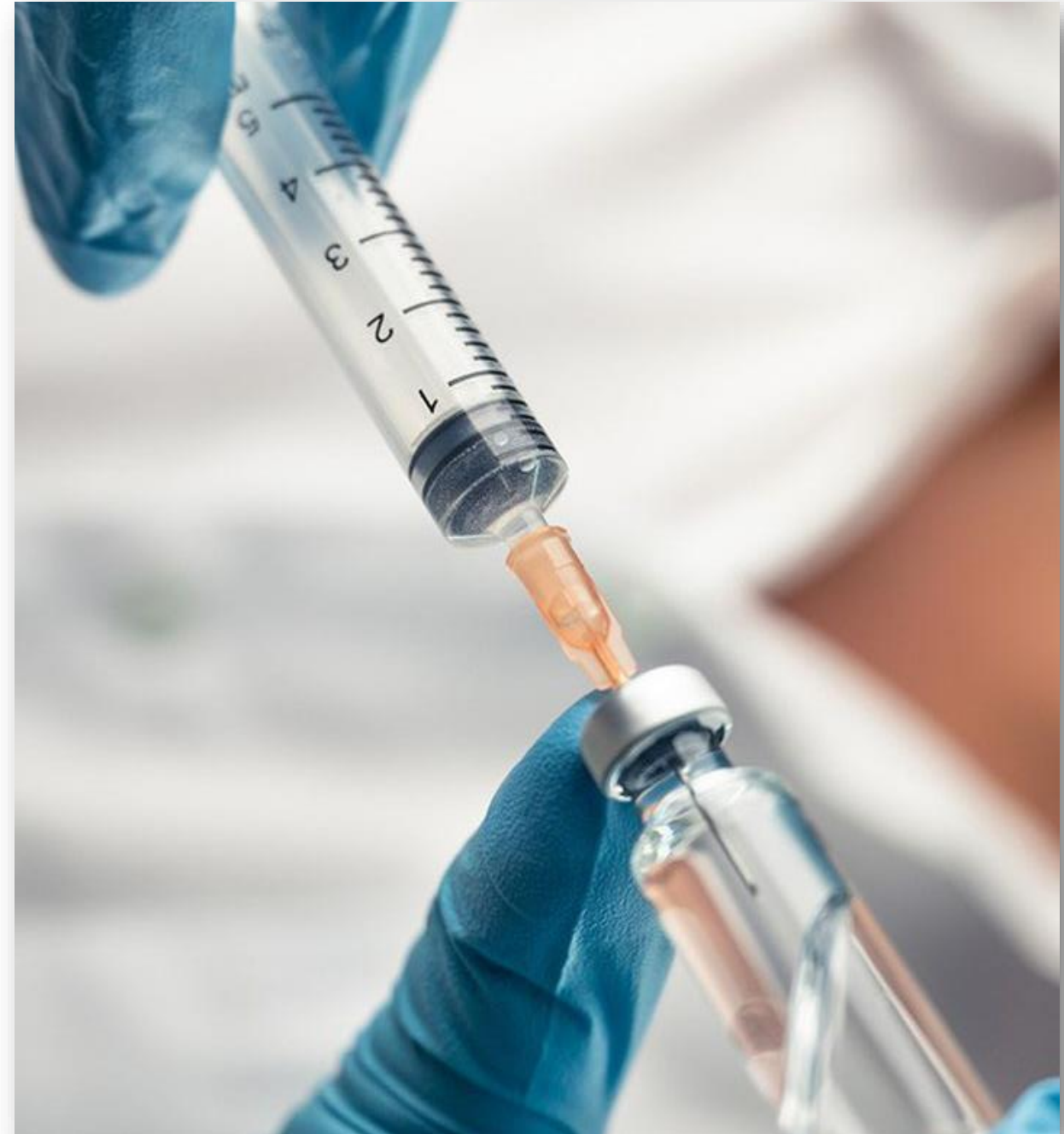
- SERB expects its business partners to comply with all applicable sanctions and export controls, and with the SERB business partners standards.

* This list of “Sanctioned” and “Sensitive” countries are current as of the date of this document (2 May 2024). Periodic updates will be available to employees on the SERB Intranet ('Hub').

II. Guaranteeing product safety and product quality

The safety of products and/or processes is our number one priority. Each employee is fundamentally responsible for the safety and quality of our products which patients and our customers rely on. SERB selects its suppliers according to the safety of their products and compliance with quality standards. SERB complies with professional product safety guidelines and programmes that are based on solid scientific principles, practical operating procedures, the latest technologies, employee training and customer information. The products sold by SERB not only meet statutory requirements and industrial standards/guidelines, but usually exceed them.

Our aim is always to meet the safety expectations of SERB customers.



III. Protection of company assets

The material and intellectual property of SERB must be protected from loss, theft and misuse. **The value of SERB is based on the ideas and the inventiveness of the people who actively promote its success.** Inventions, patents, know-how, trademarks, names and other expertise are extremely valuable. SERB protects these intangible assets, as they are of considerable economic significance to the company's future.

Each SERB employee also undertakes to respect the material and intellectual property of third parties and the Executive Committee rejects illegal ways of acquiring information. Company secrets include all information which is not publicly accessible, and which is very important to SERB or its competitors, as well as any information which only SERB possesses.



1. Non-disclosure

- SERB takes great care to protect its confidential information. Company secrets and knowledge about future developments or customers must not be passed to third parties, let alone be published, without the prior consent of the Executive Committee or the Chief Compliance Officer. Confidential information includes documents, facts, data and knowledge concerning profit figures, new products, potential acquisitions, ideas for research and development, business or marketing strategies, customer information, personnel matters, investments and holdings, manufacturing processes and internal guidelines and procedures.
- No employee may use the intellectual property of SERB for his own purposes.
- All employees must protect data against unauthorised access by third parties and avoid opportunities for third parties to access business documents. IT security, data security, and data protection are top priorities for SERB.
- Employees undertake not to disclose to third parties any information concerning SERB if it is not public, and not to disclose any document of which they may have become aware during their duties within SERB.

2. Property and equipment of SERB

- Each employee undertakes to respect the property and equipment of SERB and to treat it with care. SERB's financial assets and funds may not be used for unlawful purposes.
- Production and storage areas, laboratories, offices and workstations must always be kept clean and tidy. Each employee undertakes to use the equipment made available to them by SERB, e.g. telephones and computers, in accordance with the local guidelines of each company within SERB.
- Computers and related equipment (including mobile phones and tablets) provided to employees, as well as the data stored on devices, are the property of SERB. The inappropriate use of these devices is not permitted. Personal use of all devices (both company provided, and employee owned) should be kept to a strict minimum and must not be used for illegal or objectionable purposes.



3. Reliable communication

- Transparent, prompt, and reliable internal and external communication is an important part of SERB's corporate culture. The misinformation of employees and co-workers, the public, the market and customers is not acceptable.
- Customers should receive access to the information needed to make a sensible business decision in a suitable manner. This may be by means of general written product information or through sales representatives, for example. SERB will take any customer complaints very seriously and processes them promptly and fairly.
- All information that is provided to the public should be truthful. Improper, ambiguous, incomplete, or ill-considered statements could be misinterpreted, misused, or taken out of context, thereby causing us considerable damage. Consequently, communication via email, social networks and news media must be conducted correctly and carefully.
- As a matter of principle, business information may only be provided to the public by authorised employees. No employee may appear in public and act as a representative of SERB without prior authorisation from the Executive Committee.
- The Chief Compliance Officer must be consulted immediately in the case of enquiries by regulatory or other investigating authorities.

4. Transparent accounting

Significant business procedures are appropriately documented in the accounts. The systems deployed ensure that accounting information concerning business transactions is completely, accurately and correctly recorded. Keeping records and files that are complete, clear and understandable is therefore a matter of course for us. Records and files must be kept in such a way that auditors and financial authorities are able to follow the system used and its contents at any time.

Our processes are transparent and structured such that they can always be continued by other employees. Legal or internal obligations to retain records must be met. Documents which relate to procedures of authorities or courts of law may not be destroyed. Any documentation must be formally correct and be consistent in terms of content so that it may also be shown to third parties when required.



IV. Conduct at work

The conduct of each employee defines the public perception of SERB. That is why SERB demands appropriate and courteous behaviour towards co-workers, employees of suppliers, customers and business partners.

SERB maintains an inclusive work environment that complies with legislation and ensures the well-being, safety and health of its employees.



1. Equality

SERB employees undertake to treat one another with respect. Employees are the foundation of SERB's continued success. To ensure that their strengths can fully develop, SERB creates a work environment which encourages appreciation and promotes integrity.

SERB tolerates neither discrimination nor harassment. Performance and conduct in the spirit of teamwork are important to us, irrespective of age, origin, gender, or ethnic group. SERB judges the result of an individual's work objectively, regardless of political commitment, religion, physical constitution or sexual identity. For this reason, we do not tolerate defamation, intimidation, threats, harassment or assigning blame to others.

Fairness, respect, team spirit, and forthrightness define our work culture and our conduct towards external partners. We specifically promote cooperation between different divisions of the business and across the different countries where SERB operates. The criteria for selecting and promoting employees are performance, the ability to develop and personal qualifications. SERB is committed to a culture of learning where objective feedback is desired and appreciated by all involved and where personal attacks are prohibited.

SERB takes measures to eliminate discrimination in hiring and remuneration. It strives to promote fair treatment of candidates and to foster the professional development of its staff members.



As part of our ESG activities, SERB measures its gender pay gap (the difference in average pay between men and women) on an annual basis. The results are shared with our employees and published in our annual Sustainability report for other interested stakeholders.



2. Alcohol and substance abuse

SERB employees are always committed to behaving professionally and appropriately. Their work requires clear thinking and often the ability to react quickly. The safety of fellow employees and our customers may depend on this. Alcohol, drugs and excessive medication limit the performance of an employee.

There are strict workplace guidelines for smokers, which are consistent with local regulations. Alcohol and substance abuse is strictly prohibited.

3. Health and safety

SERB encourages safety and health-conscious conduct to protect the lives and health of its employees, to safeguard its assets, to guarantee business continuity and to build public trust. SERB makes efforts to provide a safe and productive work environment for their staff. Safety rules have been conceived for each workplace, and these must be followed. SERB companies comply with all valid laws concerning health and safety and in many cases satisfy even higher standards.

V. Corporate responsibility and sustainability

In line with our purpose, vision and values, SERB is committed to being a responsible and sustainable company. **We focus on patient care via sustainable business practices, implemented ethically and respectful of diversity.**

Our Environmental, Social, and Governance (ESG) roadmap, and associated efforts are aimed at improving the responsibility and sustainability of business practices across the company. We expect employees to support these efforts and endeavor to work with stakeholders who share these commitments.

1. Human rights

SERB respects the principles of the Universal Declaration of Human Rights, adopted by the United Nations and set out in the Charter of Fundamental Rights of the European Union and any similar declaration that may exist at national or international level. SERB strongly condemns forced labour, child labour and all practices in which people are exploited or exposed to dangerous conditions.

SERB complies strictly with laws regulating the minimum age for employment and all other employment conditions. The minimum age for employment at SERB corresponds to the Convention of the International Labour Organisation and/or the age prescribed under local law if this is stricter.

WE SUPPORT



SERB is proud to be a signatory to the United Nations Global Compact — an agreement to align our business strategies with ten principles covering human rights, labor, the environment and anti-corruption. We review and publicly report our progress on our responsibility agenda annually to the UN and via our website.

2. Minimising our environmental impact

SERB is committed to sustainable business practices and complies with laws and regulations governing environmental protection. With a philosophy of continuous improvement, we regularly look for opportunities to improve our efficiency to help manage the planet's finite resources. SERB also undertakes to measure and constantly improve environmental performance through responsible energy and fuel choices, reducing waste, and conserving water. We publish our greenhouse gas emissions (scope 1, 2, and 3), waste, and water use annually in our Sustainability report.

3. Contribution to sustainable economic and social development

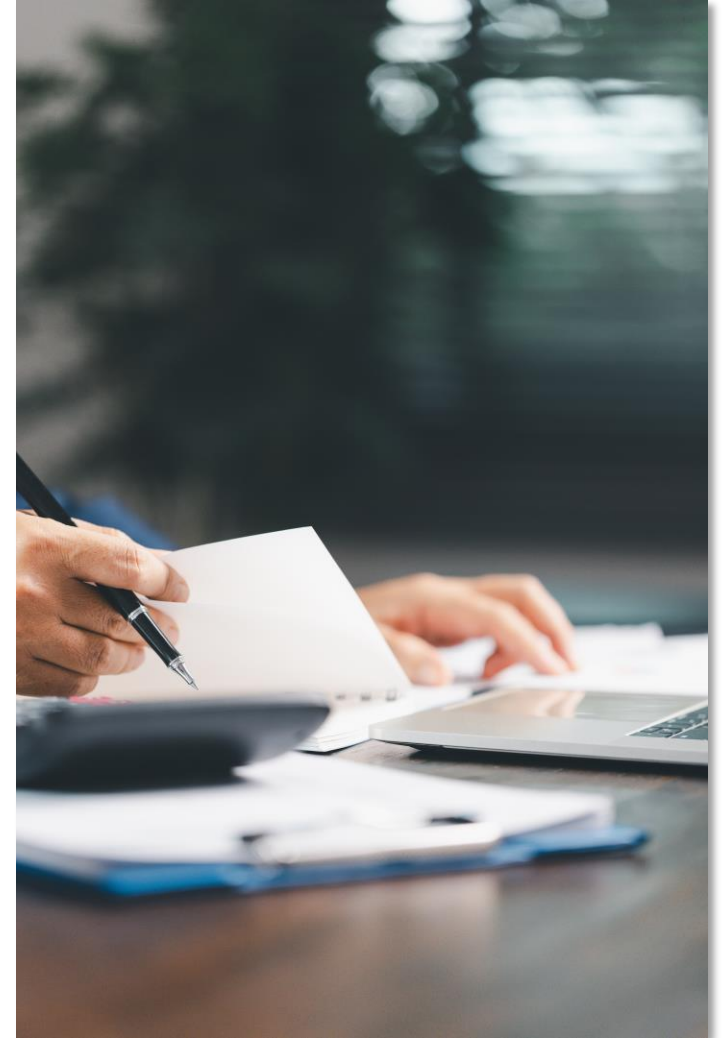
SERB works to ensure that in addition to benefitting the business, its activities are delivering value to society, our employees, and our local communities. We aim to have a positive impact on the communities in which we operate through charitable giving and employee volunteer days. We foster a safe, supportive working environment for our employees, and work to promote equality, foster inclusion, and reduce unconscious bias. SERB also takes steps to assess its major suppliers based the social, environmental and ethical impact of their products and services.



Our Volunteer Day policy gives employees the option to take one day of paid time off each calendar year to participate in a charity program or activity of a local community organisation.

Implementation of the Code

- Every individual employee at SERB is responsible for complying with the principles set out in this Code and any subsequent amendments thereof. Consequently, in addition to their function as role models, line managers have the task - with support of the Chief Compliance Officer- of ensuring that the employees they are responsible for are familiar with, remain aware of and comply with the Code and the corresponding SERB guidelines.
- The best work environment is based on mutual trust and mutual respect. SERB strives to maintain an open and direct dialogue between all line managers, employees and co-workers about its values and all matters that could influence the reputation and performance of SERB. There are not always simple answers to the questions employees encounter in everyday business. If an employee is faced with a difficult decision or is uncertain about whether they doing the right thing, they should consult immediately their line manager or the Chief Compliance Officer.
- SERB promotes a fair and open-minded working culture where honest discussions about its values can take place. Employees must ensure that SERB's interests are protected. This also includes reacting when they suspect actions that could undermine trust in SERB or damage its reputation.
- SERB's Executive Committee will not take any retaliatory measures against those who, in good faith, report actual or suspected violations of the Code. SERB clarifies suspected cases impartially and offers employees the best possible protection from unjustified premature conclusions. Only deliberately incorrect reports may involve consequences for the initiator.
- Depending on their nature and severity, violations of the Code may lead to disciplinary action including dismissal and claims for damages and could also be pursued under civil and criminal law.



How to report a concern or obtain guidance

It is every employee's responsibility to immediately raise any integrity concern or suspected violation of the Code of Conduct or company policy or procedure.

Integrity concerns can arise even when good people have the best of intentions. Sometimes knowing how to respond if you have a concern can be difficult.

SERB offers several options depending on what might be most appropriate in a given situation:

- Talk to your manager or your manager's manager.
- Speak to the relevant site or functional leader.
- Contact a member of the Group Executive Committee.
- Speak to Compliance, your Human Resources representative, or the Legal Department.

Whistleblower system

SERB also provides a whistleblowing system, operated by an independent company called Business Keeper AG. The system is open to all current or former, permanent or temporary employees of SERB, SERB's customers, suppliers, consultants, as well as third parties contractually linked to any SERB entity, to the extent that the report is provided in good faith.

This system is available 24 hours a day, 7 days a week and can securely and confidentially receive, process and manage reports regarding violations of applicable laws or internal SERB rules or policies. The system also enables anonymous reporting, when necessary,

No disciplinary action or discriminatory measures shall be taken against a Whistleblower who has reported a fact, provided the Whistleblower acted in good faith.



Employees can visit the [Compliance and Risk](#) section of the Hub (employee internet) for more on how to report concerns, obtain guidance and ask questions.

BUSINESS KEEPER 

[Click here for the whistleblowing system.](#)

(Or visit: <https://www.bkms-system.com/bkwebanon/report/clientInfo?cin=ewk9ih>)

Does My Conduct Meet the Code?

The following examples may help you answer this question correctly in day-to-day business:

- Does my decision fit with SERB business ethics as set out in the Code?
- Is my decision legal?
- Would it be acceptable for SERB or for me personally if my decision were to be made public or is it likely to have, directly or indirectly, negative consequences?
- Can I in good conscience tell my line manager, my colleagues, my family or my friends what I have done?

If you can answer “yes” to these questions, you are on the safe side.

If you are unsure, talk to your line manager or the Chief Compliance Officer (wahib.geagea@serb.com).

It is the responsibility of every line manager to ensure that the employees assigned to them know about and comply with the Code.

