

Biotest

**CODE OF ETHICS AND BUSINESS
CONDUCT**

2025

Table of Contents

I.	A Message from our Management Board.....	4
II.	What is Compliance?	5
III.	Responsibilities	5
IV.	Scope of application.....	5
V.	Internal Compliance Regulations	6
VI.	The Corporate Compliance Program.....	6
	1. Training.....	6
	2. Support and Advice.....	6
	3. Monitoring, reviews and investigations.....	6
	4. SpeakUp Helpline	6
VII.	Consequences of compliance violations	7
	Our Ethics and Business Conduct Principles	Fehler! Textmarke nicht definiert.
VIII.	Our Business	Fehler! Textmarke nicht definiert.
IX.	Corporate Integrity	8
	1. Principles for Ethical and Legal Business Conduct / Sustainability	8
	2. Anti-Corruption.....	8
	3. Embargo Laws and Trade Sanctions	9
	4. Competition and Fair Dealing	10
	5. Advertising and Promotion.....	10
	6. Quality and Safety	10
	7. Financial Integrity.....	11
	8. Anti-Money Laundering.....	11
	9. Behavior in case of inquiries and raids from authorities.....	11
	10. Communication with the Media	11

11.	Data Privacy	11
12.	Political Activities	11
X.	Personal Integrity	12
1.	Conflicts of Interest	12
2.	Use of Corporate Opportunities for Self Gain	12
3.	Insider Trading	13
XI.	Employment	13
1.	Human Rights	13
2.	Non-Retaliation	14
3.	Environment, Health and Safety	14
4.	Non-Discrimination	15
5.	Alcohol and Drugs	15
XII.	Biotest Assets	15
1.	Protection and Proper Use of Biotest Assets	15
2.	Intellectual Property	16
3.	Confidentiality, Proprietary Information and IT Security	16
4.	Social Media	16

I. A Message from our Management Board

Long-term business success is based on integrity as well as transparent and fair cooperation. Biotest is dedicated to the development, manufacture and sale of life-saving and life-enhancing drugs that meet the highest quality and safety standards. Biotest is also committed to continuous improvement to ensure the highest possible quality of life for our patients.

The highest ethical standards also apply to our business conduct. We do not tolerate unethical behaviour and refrain from doing business rather than violating laws or our compliance standards. Our commitment to these principles makes us a valued and trusted partner for our customers and business partners.

When interacting with government agencies, society and the public, Biotest provides information immediately and is guided by facts, transparency, honesty and fairness. Biotest adheres to legal requirements and acts in a politically neutral manner.

Each individual employee is an ambassador for our company and contributes to the good reputation of the company. To achieve this, everyone must comply with laws, international standards of business conduct and our internal guidelines and policies.

This Code of Ethics and Business Conduct provides an overview of these rules. It serves as a guideline for compliance-conform behaviour and is binding for the Board of Management, management, all employees, distributors and temporary workers. We also expect our business partners to comply with the rules set out here.

We appeal to you: Familiarize yourself with this code, strictly abide by our laws, standards and guidelines, take advantage of training opportunities and contact our compliance team if you have any questions. It supports you and helps you in all cases of doubt. Please use this support to protect the integrity and reputation of our company.

Sincerely

Jörg Schüttrumpf

II. What is Compliance?

Biotest defines “Compliance” as the totality of internal policies and procedures implemented by Biotest that are designed to prevent, detect and stop conduct or practices that violate laws or Biotest’s ethical standards.

III. Responsibilities

The Biotest Ethics and Business Conduct Code (“Code of Conduct”) is a guidance document that helps translate our core values into everyday work practices. It addresses typical ethical and legal issues that arise in day-to-day business, but it cannot cover every possible situation. Each individual is therefore responsible for understanding the rules that apply to their specific role and should review their own responsibilities and consult their supervisor to clarify any obligations.

For self-assessment in business situations, you should consider the following questions:

1. Is my conduct lawful?
2. Does it comply with the Biotest rules of conduct?
3. Is my conduct appropriate and free from conflicts of interest?
4. Would I be comfortable if my conduct were reported in the press tomorrow?

If you have to answer “no” to at least one of these questions, you should contact your supervisor, the local Compliance Officer or the Corporate Compliance Department.

The Corporate Compliance function coordinates group-wide measures to prevent corruption and antitrust violations and serves as a central point of contact and advisor on compliance matters for managers and employees. As a manager, you have additional responsibilities: within your area you must implement measures to ensure compliance and prevent violations, act as a role model, avoid giving the impression that it is acceptable to ignore our principles or legal requirements when taking difficult decisions, and ensure that your direct reports attend all relevant compliance trainings and regularly discuss the rules applicable to them.

IV. Scope of application

This Code of Conduct applies worldwide to everyone working for Biotest, who must comply with the Code, all applicable laws and all other company policies and principles. This includes the Management Board, executive management, all employees, distributors and temporary workers, and Biotest also expects its business partners to follow the principles set out in this Code of Conduct. The Code applies to all Biotest locations, holdings and subsidiaries, and in some countries it may be supplemented by additional guidelines or standards to reflect local legal requirements or business needs.

V. Internal Compliance Regulations

In addition to the many guidelines that apply, among others, to marketing authorization, drug safety and GxP compliance, the compliance regulations listed in Annex 1 are intended to help you fulfil your legal and ethical obligations in an appropriate manner.

VI. The Corporate Compliance Program

We must ensure that Biotest acts in accordance with all regulations relevant to our business activities. Four core elements of our Corporate Compliance Program help us to prevent corruption in our dealings with health care professionals and other business partners ("Corporate Compliance").

1. Training

Our mandatory trainings on the Code of Conduct, anti-corruption and the whistleblowing system ("SpeakUp Helpline") cover the fundamentals of the Biotest Corporate Compliance Program for all employees. These trainings address this Code of Conduct, explain the rules that apply to our business activities and are held on a regular basis for all Biotest employees.

Certain functions at Biotest (e.g. Marketing and Sales, Accounting, etc.) require specialized trainings, such as the HCP Policy, the Antitrust Policy or Business Partner Due Diligence. You will be informed if your role requires such additional trainings.

2. Support and Advice

The Corporate Compliance department of Biotest AG and the local Compliance Officers provide support to all departments and affiliates of Biotest. Make use of these resources and seek advice if you are not sure which behaviour is compliant.

3. Monitoring, reviews and investigations

Biotest monitors its business activities to ensure compliance with laws as well as with the company's policies and principles. Where potential compliance violations are reported, Biotest takes appropriate action to investigate the matter and remedy any deficiencies.

If a compliance violation occurs despite all our efforts, we will review our existing policies and training and amend them as necessary.

4. SpeakUp Helpline

If you wish to report actual or suspected misconduct, you can do so in the following ways:

1. If the misconduct relates to criminal or certain administrative offences or internal guidelines in connection with Biotest's operations, you may first contact the local Compliance Officer or the Corporate Compliance Department.

2. If the misconduct relates to human rights in connection with Biotest suppliers or operations at Biotest itself, you may first contact your manager, the local Compliance Officer or the Corporate Compliance Department.
3. If you wish to report complaints concerning environmental violations both at Biotest itself and at Biotest suppliers or about health and occupational safety deficiencies at Biotest itself, you may first contact your colleagues in the Environmental, Health and Safety Department at ehs@biotest.com, +49(0) 6103 801 666.
4. If the issue concerns violations of the German General Equal Treatment Act (AGG), or if you feel seriously discriminated against or unfairly treated at the workplace, Biotest employees may first contact their HR business partner or the relevant HR department in the respective Biotest group company.
5. If the issue concerns data integrity violations (e.g. data manipulation or falsification), your first point of contact should be your supervisor. Where such a data integrity violation relates to personal data (e.g. manipulation, falsification or unauthorised use of personal data), an additional report must also be made to datenschutz@biotest.com.

If the matter you raise cannot be resolved through the above contacts, or if you feel uncomfortable discussing it with them, you may report your concerns openly or anonymously via the Biotest SpeakUp Helpline, where you can confidentially raise concerns, report misconduct or provide information to support an investigation without fear of retaliation.



<https://biotest.speakup.report/helpline>

You are protected by law if you report a grievance or suspicion in good faith. Anyone who wants to take revenge on you because of your report must expect measures under employment law, up to and including dismissal.

VII. Consequences of compliance violations

A violation of this Code of Conduct, of Biotest's policies and principles or of applicable laws will be investigated and, depending on the locally applicable legal provisions, may result in disciplinary action up to and including termination of employment. The same applies to managers who tolerate such misconduct. Please also be aware that corruption and anti-competitive agreements are subject to criminal prosecution by the authorities. Biotest will terminate service or work contracts with external business partners who do not comply with this Code of Conduct, our policies and principles or applicable laws.

VIII. Corporate Integrity

1. Principles for Ethical and Legal Business Conduct / Sustainability

Biotest pursues a comprehensive understanding of sustainability that integrates environmental, social and governance aspects. Sustainability is firmly embedded in our corporate strategy, and Biotest is committed to the United Nations Guiding Principles on Business and Human Rights as well as to the rights laid down in the International Bill of Human Rights and the fundamental principles and rights at work set out in the International Labour Organization (ILO) declarations.

We seek to ensure that activities within our sphere of influence – whether directly or through our business relationships – do not have negative impacts on fundamental human rights as reflected in the Universal Declaration of Human Rights and the ILO core conventions. In its actions, Biotest is guided by the recommendations of the OECD Guidelines for Multinational Enterprises and the United Nations Sustainable Development Goals (SDGs) and encourages its business partners to take these principles into account as well.

In line with the Corporate Sustainability Reporting Directive (CSRD), we conducted a double materiality analysis in 2024. This forms the basis for identifying material ESG topics along our value chain and enhances transparency for both internal and external stakeholders.

We aim to be a leader in all aspects of occupational safety, health and environmental protection. We systematically identify and manage health, safety and environmental risks – both within our own operations and in cooperation with our suppliers – use natural resources efficiently and minimise the environmental impact of our activities and products throughout their life cycle.

We are open and transparent with regard to our business principles and practices. The Biotest Sustainability Report is published annually and sets out our progress and objectives in the areas of environment, social responsibility and responsible corporate governance. We respect the personal rights of our employees, patients, physicians and other stakeholders.

2. Anti-Corruption

a. Compliance with Anti-Corruption Laws and Principles

Biotest does not tolerate any form of corruption, regardless of whether healthcare professionals, public officials, company representatives or private individuals are involved, or whether Biotest is buying or selling goods or services. As a company operating in many different markets worldwide, Biotest is committed to complying with anti-corruption laws in multiple jurisdictions, including the German Criminal Code, the U.S. Foreign Corrupt Practices Act (“FCPA”) and comparable legislation in other countries (such as the UK Bribery Act), as well as any local laws applicable to Biotest’s business activities. For detailed requirements and explanations on anti-corruption and the handling of conflicts of interest, please refer in particular to the Anticorruption Policy, the Policy on Gifts and Hospitality and the HCP Policy.

b. Transparent Business Conduct

To avoid even the appearance of corruption, Biotest conducts its business openly and transparently. All transactions must be properly documented, in particular when working with public officials and healthcare professionals who are in a position to make or influence business

decisions affecting Biotest. Where such individuals provide services to Biotest, written agreements must be concluded in advance. Any remuneration paid to business partners for services rendered or products supplied must reflect fair market value, and every agreement entered into on behalf of Biotest must serve a legitimate business purpose for Biotest.

c. Supporting Research and Development, Scientific Conferences and Education

Biotest is a member of AKG e.V. (Arzneimittel und Kooperation im Gesundheitswesen) and has implemented its requirements in the HCP Policy, while also defining additional rules specific to Biotest. Within this framework, Biotest may support:

- (1) the research and development of medicinal products and improved treatment options;
- (2) the participation of physicians, nursing staff, customers and their employees in events organised by Biotest or third parties; and
- (3) professional training and continuing education events organised or hosted by Biotest, medical institutions or other organisers such as charitable associations or patient organisations or their staff.

Further details, including procedures and the involvement of Compliance Officers, can be found in the HCP Policy.

d. Donations and Contributions, Gifts and Entertainment

Biotest is also a responsible member of society and supports the healthcare sector and other charitable purposes through in-kind and monetary contributions. Charitable causes may be supported only where such support is not driven by existing or potential business with Biotest, and any donation must be requested by the charitable organisation. Further details are set out in the Policy on Donations and Sponsorships, the Anticorruption Policy and the Policy on Invitations and Gifts.

e. Never Improperly Influence Patients

Biotest understands and respects the close relationship between patients and their healthcare providers and therefore avoids any interaction with patients. Biotest's relationships with patient organisations are transparent and free from conflicts of interest.

Further information is provided in the HCP Policy.

3. Embargo Laws and Trade Sanctions

Failure to comply with national and international trade laws can lead to criminal sanctions against Biotest and its employees, including the suspension or withdrawal of trade privileges. Biotest therefore reviews and complies with export control rules and other relevant international trade regulations in all countries in which it operates, covering the import and export of goods, technology, software, services and financial transactions.

Biotest does not participate in restrictive trade practices or boycotts that are prohibited or penalised under applicable law. All activities, in particular contracts, involving sanctioned countries or sanctioned persons must be reviewed by the responsible functions (e.g. Commercial

Operations, Customer Service Center, Finance, Tax and Customs, Legal and Compliance) to ensure compliance with foreign trade control and applicable sanctions laws.

4. Competition and Fair Dealing

German and European antitrust and competition law protect fair competition by prohibiting agreements between companies (such as price-fixing), abuse of a dominant market position and mergers that would significantly restrict competition. The objective is to ensure that consumers pay fair prices and that both small and large companies have equal opportunities, with authorities such as the German Federal Cartel Office and the European Commission monitoring compliance.

Biotest does not tolerate any business conduct, transactions or activities that violate antitrust or competition laws. If, in the course of your work at Biotest, you observe anything that may raise antitrust or competition law concerns, you must seek advice from the Legal Department.

Except where permitted by law in exceptional cases, you must not enter into any agreement with actual or potential competitors concerning pricing, discounts, other terms of sale, allocation of markets or customers, or the sale (or non-sale) of our products or those of our competitors. You should be particularly careful at association meetings and congresses and avoid discussions on these topics.

Further information can be found in the Antitrust Policy; if you have any questions, please contact the Compliance Department.

5. Advertising and Promotion

The way in which Biotest promotes its products and services is strictly regulated. Biotest has established specific procedures to ensure that marketing and promotional activities comply with applicable laws, rules and regulations, and all promotional materials relating to Biotest products or services must be reviewed and approved through the appropriate process for each country. For further details, please refer to the HCP Policy, SOP-C-00007 “Obtaining approval for promotional and non-promotional materials used in interactions with healthcare professionals” and SOP-S-00091 “Der Informationsbeauftragte (IB) nach §74a AMG”

6. Quality and Safety

The quality and safety of our products and services are the foundation of Biotest’s business activities. Biotest is committed to developing, manufacturing and distributing high-quality, safe products that meet all applicable regulatory requirements.

Patient safety is our highest priority. It is ensured by the timely assessment, identification, management and reporting of product-related risks, and employees in all parts of the company – not only those who directly interact with customers and physicians – must report any incidents they become aware of to the Pharmacovigilance / Drug Safety department. The overall quality orientation of our company is set out in the group-wide Quality Policy QML-S-00001, while the practical implementation of these principles is described in the Quality Manual QML-S-00003.

7. Financial Integrity

Biotest stands for transparent, complete and accurate financial reporting. All financial transactions and records must be properly documented, comply with applicable regulations and be economically traceable, and claims are issued only for services that have been duly rendered.

8. Anti-Money Laundering

“Money laundering” refers to concealing the origin of funds derived from criminal or terrorist activities, such as bribery, terrorism, drug trafficking or fraud. Anti-money-laundering laws require Biotest, among other things, to subject business partners from countries with a high money-laundering risk to enhanced due diligence and to report suspicious transactions to the customs / financial intelligence authorities.

To comply with applicable anti-money-laundering requirements, Biotest has implemented the Due Diligence SOP (careful review of business partners) and the FIU Policy (reporting of suspicious transactions to customs / the Financial Intelligence Unit).

9. Behavior in case of inquiries and raids from authorities

If you are confronted with an official inquiry by a government authority (including outside Biotest’s premises in connection with your work for Biotest), you must immediately inform your supervisor and the responsible specialist department. In the event of a search, you must immediately notify the Legal or Compliance Department and follow the applicable search guidelines.

10. Communication with the Media

Clear, consistent and responsible communication is an important element of Biotest’s credibility. For this reason, public statements on behalf of Biotest are made exclusively by authorised functions, in particular Corporate Communications or Investor Relations, and any external inquiries must be forwarded to Corporate Communications or, depending on the subject matter, to another authorised function, as further specified in the External Communications Policy.

11. Data Privacy

In the course of our regular business activities, we process personal data of employees, donors, customers and other business partners. Biotest is committed to collecting and storing only such personal data as is legitimately required for business or employment-related purposes, to treating this data confidentially and to protecting it in accordance with applicable data protection laws. Further details are set out in the Biotest Data Protection Policy.

12. Political Activities

Biotest does not interfere in current politics and does not support any political party. Where Biotest’s own interests are affected in areas such as health or tax policy, any necessary lobbying activities will be carried out in strict compliance with the applicable legal framework, while the company remains politically neutral.

Biotest respects and supports employees' right to engage in political activities in a private capacity. Any statements on political issues must be clearly identified as personal opinions, and employees may not use working time, company property or other corporate resources for their political activities.

IX. Personal Integrity

1. Conflicts of Interest

In performing your work, you are responsible for making business decisions in the best interests of Biotest and without regard to personal gain. Conflicts of interest may arise where there is a risk that your personal interests could conflict or interfere with those of the Company.

Such situations – or situations that may give the appearance of a conflict of interest – cannot always be avoided. For example, if you recommend a friend and former colleague, who is also highly qualified, for a position at Biotest, you must disclose this to HR, your supervisor and, where appropriate, the Compliance Department and then follow their decision. You should disclose any personal interests that could jeopardise your objectivity or professionalism in carrying out your work, including interests outside your direct employment, such as in the context of permitted secondary employment. It is advisable to document the decision on how to handle a potential conflict of interest in order to address any future questions or allegations.

You are in particular required to:

- Inform the HR department in accordance with your employment contract and internal company rules and obtain any required written approval before you take up any secondary employment or act as a consultant, board member or in a comparable position for another company.
- Inform your supervisor before making any financial investment in a competitor, supplier or customer, whether by acquiring a business or an equity interest (this does not apply to purchasing shares in a listed company).
- Inform your supervisor or HR and, where possible, refrain from taking an active role in the selection, contract negotiations or decisions concerning employees, business partners, suppliers or competitors of Biotest where the interests of your spouse, close relatives or personal friends or acquaintances are involved; if in doubt as to whether you should disclose a relationship, it is better to disclose it once too often than once too little.

2. Use of Corporate Opportunities for Self Gain

Business opportunities that arise in connection with your work for Biotest belong to Biotest and not to you personally.

You are prohibited from:

- using Company opportunities, property, confidential or proprietary information or your position for personal gain.

- taking advantage of your position at Biotest by setting up a competing business, otherwise acting as a competitor of Biotest; or
- taking advantage of a business opportunity that belongs to Biotest by pursuing any opportunity or business venture or otherwise engaging in any activity that would result in your competing with Biotest.

3. Insider Trading

In the course of your work, you may become aware of material non-public information about Biotest or about planned transactions with customers or other partners. Such information may constitute “inside information”, which generally includes any non-public information that could have a positive or negative effect on the share price of a company if it were made public.

You may not buy or sell Biotest securities or the securities of any other company based on such non-public information. In addition, you may not provide such inside information to anyone else so that they can profit from it. These restrictions apply no matter where you live, or where the person who might receive the information lives. Insider trading is prohibited and could subject Biotest and the individuals involved to large monetary penalties and even criminal liability.

Examples of material non-public information (prior to adequate disclosure) include:

- earnings and other financial information
- changes in dividends
- changes in senior management
- significant regulatory developments
- mergers, acquisitions, and joint ventures
- approval or denial of a significant product
- other significant developments or an important financial transaction.

X. Employment

At Biotest, we foster a working culture characterized by respect, fairness and mutual appreciation. Our cooperation is based on team spirit, trust and integrity, and discrimination, harassment, intimidation, hostile behavior or any form of violence have no place here, whether overt or subtle. Our internal HR and conduct policies define the expectations and standards for a fair and productive working environment.

1. Human Rights

Biotest is committed to internationally recognised human rights and to the fundamental principles of the International Labour Organization (ILO). Forced labour, exploitative child labour and any other practices that violate human rights are firmly rejected, and these principles apply to all Biotest group companies as well as to our suppliers and business partners.

2. Non-Retaliation

Biotest promotes an open corporate culture in which concerns or indications of potential violations can be raised without fear of negative consequences. Retaliation against any person who, in good faith, reports information about legal violations is not tolerated and may result in disciplinary measures.

Reports can be made confidentially through various internal reporting channels, such as Human Resources, Compliance, Legal Services or managers who are not involved in the matter, and the Biotest SpeakUp Helpline is also available for this purpose.

3. Environment, Health and Safety

Occupational Health, Safety and Environmental Protection

Protecting people and the environment is a top priority at Biotest. Safety, health protection and environmental responsibility are not only legal requirements but also an integral part of our corporate culture, and occupational health, safety and environmental protection are seen as a shared responsibility to which all employees, managers, visitors and contractors actively contribute. Safety and environmental protection measures form an integral part of all work processes, with the objective of minimising risks, protecting health and avoiding environmental impacts; open reporting of hazards, continuous improvement and strict compliance with applicable regulations are central elements of this responsibility.

Principles of conduct for occupational safety:

- Personal protective equipment (e.g. helmet, safety glasses, hearing protection) must be worn in all designated areas.
- Equipment and work tools must be checked for proper condition before use; any defects must be reported immediately to the responsible manager.
- Safety instructions, warning notices and site rules must be followed at all times.
- Working under the influence of alcohol, drugs or impairing medication is prohibited.
- Risky behaviour and improvised working methods must be avoided.
- Emergency exits, escape routes and assembly points must be known and kept accessible.
- All accidents, near misses and hazardous situations must be reported without delay to the responsible manager or, alternatively, to the EHS department.

Principles of conduct for environmental protection:

- Energy, water and materials must be used responsibly and sparingly, and unnecessary consumption and waste must be avoided.
- Waste must be segregated in accordance with company rules and disposed of properly; illegal disposal is prohibited.
- Environmentally relevant incidents, emissions or leaks must be reported immediately.

Further details are set out in internal policies on occupational safety, health and environmental protection, as well as on emergency management and sustainability management.

4. Non-Discrimination

Biotest stands for equal opportunities and a culture of mutual respect. We do not tolerate discrimination or disadvantage based on personal characteristics such as ethnic origin, religion, gender, sexual orientation, disability, age or any other characteristic protected by applicable law.

Our interactions with one another are guided by a shared set of values that is embedded both in our internal policies and in the way we work together every day.

5. Alcohol and Drugs

A safe and healthy working environment is a top priority for Biotest. The consumption of alcohol or drugs in the workplace – as well as the misuse of medication – can impair the ability to work and poses a risk to both the individual and others.

All employees are expected to behave responsibly in this regard, and further provisions are set out in policies such as the Works Rules and the relevant works agreements.

XI. Biotest Assets

1. Protection and Proper Use of Biotest Assets

We properly use and maintain property and assets of Biotest and make sure that they are protected from misuse, loss, theft and waste. All Biotest assets may be used solely for legitimate Company-related business purposes.

Biotest physical assets include items such as

- inventory
- supplies
- work equipment (e.g. computers, internet, email, mobile phones)
- vehicles
- records and funds
- any other tangible property that Biotest owns, rents or leases

Assets may also be non-physical or intangible, for example, the Company name, logo, trade secrets, strategies and customer information.

You are responsible for ensuring that Biotest's property and assets are not misused, wasted, damaged, lost or stolen. You must not provide third parties with any Biotest property or asset, unless you are authorized to do so in a legitimate business transaction.

2. Intellectual Property

Biotest's property and assets, in particular its intellectual property, are a key driver of the company's success. In performing your duties, you must protect Biotest's intellectual property, including patents, trademarks, copyrights, trade secrets, other proprietary information, know-how and expertise developed in the course of business activities.

Biotest also respects the legitimate intellectual property rights of third parties. If you reproduce or misuse third-party intellectual property without permission, this may result in substantial fines and potentially even criminal liability for both you and Biotest.

3. Confidentiality, Proprietary Information and IT Security

All non-public information relating to Biotest must be treated as confidential and appropriately protected, regardless of whether a formal confidentiality obligation exists. "Confidential information" includes, in particular, product characteristics, manufacturing processes, analytical methods, SOPs, and Biotest's strategic, financial, technical and business data, as well as all trade secrets and business-related information of our contractual partners.

In the course of your work, you may gain access to sensitive or protected information that is of significant economic value to Biotest; this information forms part of our intellectual property and constitutes a corporate asset, and you are obliged to handle it with the utmost care and protect it from unauthorised access, misuse or disclosure. The same applies to confidential information received from business partners or other third parties: you must preserve its confidentiality and ensure that it is neither disclosed nor used in any way that would violate legal requirements or contractual obligations.

IT systems – hardware and software, as well as the data processed on them – are critical to our business success and must be protected; every computer user is responsible for using these resources properly and securely for legitimate business purposes, with particular attention to information security (especially confidentiality and data integrity) and data protection. At the end of the working day, your workplace should be free of documents, notes and sensitive information, confidential documents and mobile data carriers must be stored in lockable cabinets, and screens and devices must be locked (e.g. using the Windows key + L) or switched off to reliably protect sensitive information.

4. Social Media

Biotest expects responsible use of company-related content when using social media. Maintaining confidentiality, protecting sensitive information and using a respectful tone are mandatory standards in digital environments as well.

The key behavioural requirements are set out in detail in the Social Media Policy:

Dr. Jörg Schüttrumpf
CEO

ppa. Dr. Oliver Hein
Chief Compliance Officer

Annex 1

1. Biotest Ethics and Business Conduct Code (CoC)
2. BC-POL-00003 HCP Policy of Biotest AG and its affiliates governing transactions with healthcare professionals
3. In Germany, Biotest has implemented the rules of the AKG Code of Conduct on cooperation with physicians and other healthcare professionals in its HCP Policy. The international Biotest affiliates have developed their own local HCP Policies based on the requirements of their respective national pharmaceutical industry associations.
4. BC-POL-00002 Antitrust Policy, which sets out rules on antitrust law, in particular regarding the exchange of information with competitors.
5. BC-POL-00004 Policy on Gifts and Invitations, which governs interactions with business partners who are not HCPs.
6. BC-SOP-00006 “Due Diligence and Risk Categorization for Onboarding Business Partners”, which governs the process for reviewing new and existing business partners.
7. BC-SOP-00007 Political Donations, which makes clear that Biotest does not grant political donations.
8. BC-SOP-00008 Dealing with Extortion, which governs conduct where payment is demanded, for example in the form of facilitation payments.
9. BC-SOP-00018 Biotest Group Policy on Contributions in the Form of Donations and Sponsorships, which governs their content and procedures.
10. BC-SOP-00019 Research Grants, which governs research collaborations.
11. BC-SOP-00022 Whistleblower Policy, which governs the protection of whistleblowers and the use of the SpeakUp Helpline.