

Biotest

**CODE OF ETHICS AND BUSINESS
CONDUCT**

2020

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I. A Message from our Management Board

Dear fellow employees,

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



Dr. Michael Ramroth
Chief Executive Officer
Biotest AG



Dr. Georg Floß
Chief Operations Officer
Biotest AG

II. What is Compliance?

Biotest defines "compliance" as the sum of all internal corporate policies and procedures implemented by Biotest that serve to prevent, detect and eliminate behaviour or practices that are illegal or that do not conform to Biotest's ethical and business standards.

III. Responsibilities

The Biotest Code of Ethics and Business Conduct ("Code of Conduct") is a guide that helps to implement our core values in our daily work. It deals with typical ethical and legal issues arising in day-to-day business. However, it cannot cover every specific situation. Each individual must therefore understand the rules that apply to his or her work. Please consider your role and contact your supervisor to learn more about your responsibilities.

For self-examination, ask yourself the following questions when acting in business situations:

1. Is my conduct lawful?
2. Does it comply with the Code of Conduct?
3. Is my conduct correct and free of conflicts of interest?
4. Would it be okay for me if my behaviour were to be in the press tomorrow?

If you have to answer "No" to at least one of the questions, please contact your supervisor, the local Compliance Officer or the Corporate Compliance Department.

Additional Responsibilities of Managers

As a manager, you have additional responsibilities. You must implement compliance measures in your area of responsibility and prevent violations. Be a role model, because others are guided by your behaviour. When making decisions and implementing difficult measures, do not give the impression that it is acceptable to ignore our principles or laws and regulations. Ensure that employees reporting directly to you participate in all relevant compliance training and regularly discuss the applicable regulations with them.

IV. Scope of application

Everyone working for Biotest worldwide must comply with this Code of Conduct and all applicable laws and company guidelines and policies. This includes all staff and levels of Management, distributors and temporary workers. We also expect our business partners to comply with the principles of this Code of Conduct. The Code of Conduct applies to all of Biotest's locations, affiliates and subsidiaries. In some countries, local laws or business requirements may supplement the Code of Conduct with additional guidelines or standards to meet local requirements.

V. Internal Compliance Regulations

In addition to the many guidelines that apply in the areas of marketing authorisation, drug safety and GxP compliance, the following internal compliance regulations are available to assist you in fulfilling your legal and ethical obligations:

- i) Code of Ethics and Business Conduct
- ii) Guidelines and Policies

Biotest has established further guidelines and Policies on company-wide and local peculiarities, which are more closely related to important elements of the Code of Conduct or are tailored to the specific legal regulations of a country.

- iii) Biotest Compliance Manuals of Biotest AG and its international associated companies on transactions with health care professionals and organizations.
- iv) In Germany, Biotest has implemented the rules of the AKG code of conduct on cooperation with doctors and other healthcare professionals in its compliance manual. Biotest's international associated companies have established their own compliance manuals as local guidelines based on the requirements of their respective national pharmaceutical industry associations.

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 general training courses are mandatory for all employees and cover the basics of the Biotest Corporate Compliance Program. The training covers this Code of Conduct and explains the rules that apply to our business. General training is provided on a regular basis for all Biotest employees.

Certain Biotest functions (e.g. marketing and sales, accounting, etc.) require special technical training, in particular in relation to the Compliance Manuals of Biotest AG and its international associated companies. You will be notified if your position requires these additional training sessions.

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 and audits its business activities to ensure that laws, guidelines and policies are followed. If possible compliance violations are reported to us, we will take appropriate action to investigate these reports and remedy any shortcomings.

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

4. Compliance Telephone Hotline

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

- i) You may first contact your supervisor, the local Compliance Officer or the Corporate Compliance Department.
- ii) If the matter you have raised cannot be resolved by one of the above contacts, or if you feel uncomfortable discussing the matter with them, you can use the telephone hotline openly or anonymously:

Compliance Telefon Hotline
under 00800 8010 1234 (from Germany)
or 0-00800 8010 1234 (from the Biotest network)

For countries with affiliates or representative offices:

| | |
|---------------|----------------|
| Brazil | 0800 89 20 866 |
| France | 0800 90 53 99 |
| Great Britain | 0800 09 68 795 |
| Italy | 800 79 08 40 |
| Russia | 8800 30 17 428 |
| Austria | 0800 29 25 90 |
| Switzerland | 0800 55 85 34 |
| Spain | 900 99 49 48 |
| Hungary | 06800 21 487 |

You can reach the lawyers Dr. André Kowalski or Axel Staudt of the law firm Franz Rechtsanwälte in Düsseldorf on these toll-free telephone numbers as well as on the fee-based telephone number: +49-(0)211-15 76 76-0. Without having to fear any disadvantages, you can give them your information or suspicions and, if you wish, remain anonymous. In this case, Franz Attorneys at Law are obliged to maintain your anonymity towards us and to comply with their professional duty of legal secrecy.

With respect to matters to be reported from Italy or pertaining to suspected misconduct in Italy the Compliance-Hotline serves as well as a Whistleblower-Hotline in accordance with the Legislative Decree 8 June 2001 No. 231.

VII. Consequences of compliance violations

Any violation of this Code of Conduct, Biotest's guidelines and policies or applicable law will subject staff to disciplinary action and, depending on local legal regulations, may lead to labour law measures or even dismissal. In addition, please bear in mind that state authorities may impose criminal penalties for corruption and illegal competition agreements (bid rigging). Disciplinary action may also be taken if managers ignore or fail to correct misconduct. Furthermore Biotest may terminate the service or work engagement of non-employees who fail to comply with this Code of Conduct, our guidelines, policies and applicable law.

Our Ethics and Business Conduct Principles

VIII. Our Business

Our success depends upon appropriate relationships with our customers, physicians, employees, regulators, government and private payors as well as patients. Biotest is committed to manufacturing products meeting regulatory standards and providing the optimal sustainable quality of medicinal products to our customers, physicians and patients.

IX. Corporate Integrity

1. Principles for ethical and legal business activities

Biotest is committed to adhering to the United Nations' guiding principles for business and human rights. In doing so, Biotest respects the human rights set out in the international human rights charter and the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization.

In addition, Biotest's actions are based on the recommendations of the OECD Guidelines for Multinational Enterprises - Recommendations for responsible business conduct in a global context. Biotest encourages its business partners, including suppliers and subcontractors, to apply, where practicable, the principles of responsible business conduct as defined in the OECD Guidelines for Multinational Enterprises.

2. Anti-Corruption

a. Compliance with Anti-Corruption Laws and Principles

Many countries in which Biotest does business have laws against the improper influence or corruption of government officials. In addition, anti-corruption legislation in some countries extends the prohibition on improper influencing to non-government officials (i.e., private individuals). We will not tolerate any form of corruption, whether involving a healthcare professional, government official, company representative or private party, or whether the transaction involves Biotest purchasing or selling items or services.

As a company being active in many different markets around the globe, we are fully committed to comply with the anticorruption laws of many jurisdictions, inter alia the German Criminal Code, the U.S. Foreign Corrupt Practices Act (“FCPA”) and similar laws in other countries (i.e. the UK Bribery Act), including local laws, as they apply to Biotest’s business.

Be aware that the healthcare systems in many countries are operated by the government, and healthcare providers (e.g., physicians and hospital personnel) frequently are considered by local law to be civil servants and therefore government employees. Be particularly sensitive to this issue because a country’s government is often both the regulator of our products and a customer.

If you are involved in government procurement activities (i.e., government purchases of Biotest products), you must also be aware of the laws regulating that area.

Do not make, offer, or promise any payment, gift, service, or anything of value (directly or indirectly) that is intended to improperly influence the actions of government personnel or private individuals to advance Biotest’s commercial interests.

Do not provide anything of value, including grants, donations, or gifts, to encourage the recipient, either from the government or private sector, to use or to influence the selection of Biotest products. Review the additional Biotest policies that address this subject in specific contexts.

Be aware that customs in one country, including gift giving, may not be lawful or appropriate elsewhere.

b. Sample Forms of Prohibited Conduct

The following examples of conduct may be considered to be corrupt and are therefore strictly prohibited. DO NOT

- i) give or accept an advantage where the nature or value of the advantage is not reasonable and appropriate to the occasion, the circumstances or the position of the receiver. It is in particular inappropriate to give or accept
 - a. any advantage that does not have a clear business reason, or if the business reason is outweighed by non-business activity;
 - b. advantages so frequently that the giving or accepting may potentially be regarded as excessive; or
 - c. any advantage in a non-transparent manner, in particular when a private address or email account is used.

An “advantage” is understood as any form of value, being either a financial or a non-financial contribution to a person or a legal institution.

- ii) use a related party (a relative or an individual with whom the recipient lives in cohabitation) to give or accept any advantage;
- i) give or accept an advantage with the intent and expectation of receiving or giving something in return;

- ii) give or accept an advantage that may limit or influence the receiver's or your objectivity or discretion, or influence the decision-making process of the receiver's employer (including a government agency, hospital or ministry) or Biotest; or
- iii) give any advantage that is not accurately recorded in Biotest's books and records.

c. Biotest Does Business Transparently

Corruption often occurs in secrecy. Persons engaged in corrupt activities may try to disguise their actions and to act in secret to hide the misconduct. An effective measure to prevent corruption and to avoid the appearance of corruption is to conduct business openly and transparently.

One of the core elements of transparent business conduct is proper documentation. Avoid entering into any agreement without proper written documentation. Written documentation is in particular important in connection with government officials and healthcare professionals who hold a position that enables them to make or influence business decisions that affect Biotest. If these individuals provide services for Biotest, the legitimate business need for the services, the reason why the healthcare professional or government official was selected, and the services performed, must always be comprehensively recorded in writing. Such a written agreement has to be executed prior to the service is being provided.

Corrupt practices may be disguised by over-compensating business partners. For example, a distributor may receive unreasonably high commission, or speakers at conferences or other consultants may receive excessive payments for their services. We expect you to refrain from entering into any agreement on behalf of Biotest if you are in doubt as to whether the compensation for the business partner is commercially reasonable. Any compensation we grant to any of our business partners for actually provided services or product deliveries must represent fair market value. In addition, any agreement on behalf of Biotest must serve a legitimate business purpose for the company ("bona fide service").

d. Supporting Research and Development, Scientific Conferences and Education

It is in Biotest's best interest to support

- i) the research and development of pharmaceutical products and treatment improvements that are of legitimate interest to Biotest;
- ii) the participation of physicians, nurses, customers and their staff in Biotest or third-party events which promote scientific knowledge, medical advancement or delivery of effective healthcare; and
- iii) training and further education events hosted or organized by Biotest or medical institutions or other organizers, such as (charitable) associations or patient organizations or their employees which promote scientific knowledge, medical advancement or delivery of effective healthcare.

While activities of this nature serve an important purpose, inappropriate activity relating to research and development, scientific conferences and education may have severe consequences for anyone involved, as well as for Biotest as a company. If you have any doubts, reach out to your Compliance resources.

e. Donations and Contributions, Gifts and Entertainment

We at Biotest are committed to being good corporate citizens and support using our resources to advance primarily healthcare but also other worthy charitable causes. Business units may support charitable causes, as long as it is not driven by existing or future business with Biotest. We make charitable donations to worthy causes, particularly contributions to charities or civic organizations that provide services in the communities where Biotest conducts business.

Donations and contributions (including educational grants) always require pre-approval. All donations and contributions must be made transparently. Each country has a process for reviewing all proposed donations. In addition, raise questions about any potential conflict of interest or compliance issues that may arise from charitable donations.

All gifts, entertainment and business meals provided or received must be reasonable and small enough that they do not influence our decisions. We never offer or accept anything of value in exchange for referrals or other business. We communicate to vendors, physicians, patients, customers and others that our values restrict what we can give and receive because we want our service and business relationships to stand on their own. We do recognize that certain items are appropriate and do not present a risk of influencing our decisions. Each employee needs to be sure that even permitted items do not damage our reputation or integrity under the circumstances. If you are unsure, review the additional Biotest guidelines and policies that address these subjects in more detail or contact your Compliance Officer or the Compliance Action Line.

f. Never Improperly Influence Patients

We understand the close relationships between patients and their healthcare providers. However, we always have to avoid conducting business transactions with patients that may result in an actual or potential conflict of interest. We do not accept that any business related activity may affect the patient's sole entitlement to take independent and uninfluenced decisions on anything that is related to the way, means and process of medical treatment. We strive to have open, objective relationships with patient organizations.

g. Respect Physician-Patient Relationship

We understand and accept the important nature of an independent Physician-Patient relationship. Our business relation with physicians shall always address the legal requirements governing the arrangement, and where appropriate set forth expectations regarding compliance with applicable Biotest policies, laws and regulations, and this Code. We do not pay for any kind of referrals. We accept referrals and admissions based on patient medical needs and our ability to provide the needed medicine. We do not directly or indirectly give or offer anything of value in exchange for referrals that would be a violation of the law.

3. Embargo Laws and Trade Sanctions

Biotest is committed to maintaining compliance with applicable laws controlling imports, exports, re-exports and diversion of its products, goods, services and technical data, including import and customs laws, export controls, economic sanctions, denied parties lists, anti-boycott laws and diversion of products. Biotest does business all over the world, and the laws of one country or jurisdiction may apply to transactions or activities that occur elsewhere. Many countries maintain a program of economic and trade sanctions and embargoes against certain countries and certain

parties. Prohibitions on certain exports and imports are also often in place. In addition, various governments have enacted laws that prohibit companies from participating in, or cooperating with, any international boycott that the government does not approve. Failure to comply with international trade laws can subject Biotest and its employees to civil and criminal penalties, including suspension or denial of trade privileges.

We check the export classification and follow relevant international trade control regulations of all countries in which Biotest operates as they relate to importing and exporting goods, technology, software, services and financial transactions.

We do not cooperate with any restrictive trade practice or boycott that is prohibited or penalized under applicable laws.

All activities, especially contracts, involving sanctioned countries must be reviewed by the competent departments (i.e. Customer Service center, Foreign Trade and Customs department, Finance, Law and Compliance departments) to ensure compliance with trade control laws.

4. Competition and Fair Dealing

Competition laws promote fair competition. These laws often focus on ways to ensure that businesses compete on the basis of quality, price and service. Biotest will not tolerate or participate in any business conduct, transaction or activity that violates the competition laws of any country in which we do business. This area of the law is extremely complex and can vary from country to country. These laws may be known as antitrust, monopoly, fair trade, competition, price discrimination or cartel laws. They generally apply to interactions between current or potential competitors, as well as to interactions between a company and its customers, suppliers and distributors. Consult the Law Department for guidance if you are about to engage in a situation that you think may involve any antitrust or competition laws.

As far as not legally permitted, do not engage in discussions or make agreements with any actual or potential competitor about pricing policies, discounts, or other terms of sale, or splitting markets or customers.

As far as not legally permitted, do not engage in discussions or make agreements with any actual or potential competitor about the sale (or non-sale) of either our products or theirs.

Never bribe or attempt to bribe customers or suppliers to help our business or hurt our competitors.

Exercise caution when you engage in conduct that could give the appearance of unfair competition or the abuse of a dominant position in the marketplace.

5. Antitrust

Antitrust and competition laws seek to protect competition by prohibiting behavior that results in decreased competition or unjustified price discrimination or produces other artificial forces in the market. Antitrust laws exist in virtually all countries and apply to conduct at all levels of an organization. In general terms, antitrust laws require companies to compete on an individual basis rather than join with other companies in agreements to restrict competition. Any concerted

actions, informal talks or agreements that are intended to restrict competition or may have the effect of doing so, are prohibited.

The consequences of violating these laws are severe. You should be particularly careful at association meetings and trade shows to avoid the appearance of anti-competitive behavior.

6. Advertising and Promotion

The manner in which Biotest promotes its products and services is highly regulated. Biotest has developed specific procedures to ensure marketing and promotional activity complies with applicable laws, rules and regulations. All promotional material regarding Biotest products or services must be reviewed and approved through the appropriate process for each country. When you are discussing our products and services, you **MUST**

- always be truthful and accurate in describing products and services;
- provide a fair and balanced description of the benefits and risks; and
- only make statements that are supported by appropriate clinical information.

7. Quality and Safety

The quality and safety of our products and services are the basis of our business. Biotest is committed to develop, manufacture and deliver high-quality and safe products that meet all regulatory requirements. Statutory as well as internal quality and safety regulations must be strictly followed. You are responsible for ensuring compliance with these principles within your area of responsibility.

Patient safety is a priority. We protect patient safety by identifying, assessing, managing and reporting any product-related risks in a timely manner. An important part of improving product quality and safety is gathering and reviewing adverse events and product complaints. We expect you to understand and to follow Biotest policy regarding adverse event reporting and product complaints. Staff in all parts of the company – not just those who work in functions that directly interact with patients and physicians– should report adverse events that come to their attention.

8. Financial Integrity

We do not compromise our financial integrity. Financial risks and operational measures must be appropriately reviewed and approved.

Accurate business records are essential to Biotest Management and to maintaining and safeguarding investor confidence. They also help the Company to fulfill its obligation to provide timely, accurate and complete financial information to our shareholders and financial markets. All of our books, records and accounts must fully and accurately reflect the Company's business transactions and assets. We must ensure that all paper and electronic records are managed and maintained properly as required by applicable laws on data retention and Company policies on records management. All financial and business transactions must be accurately and promptly recorded in the proper accounts and during the proper accounting period.

We maintain a system of internal accounting controls to provide reasonable assurances that all financial records and accounts are accurate.

We submit claims for payment or approval that are accurate, truthful and complete. They must conform to applicable legal and contractual requirements.

Claims may be submitted only for products and services that have been properly ordered and actually provided. Appropriate records must be available to accurately document such transactions.

9. Anti-Money Laundering

Money laundering involves hiding the origin of funds derived from criminal or terrorist activity, for example through bribery, terrorism, drug transactions or fraud. Many governments have anti-money laundering laws that prohibit engaging in transactions that attempt to hide the proceeds of crimes by making those proceeds look legitimate.

Biotest is committed to complying fully with all applicable anti-money laundering laws and regulations. We will take reasonable steps in order to conduct business with reputable business partners involved in legitimate business activities, with funds derived from legitimate sources. Alert your supervisor to any payment or other unusual customer transaction that seems inappropriate or suspicious.

10. Proper Response to Information Requests

We are committed to appropriately responding to all government inquiry, audit or investigation. If you are confronted with a government request that does not fall within your responsibilities, immediately contact your supervisor for guidance. Please notify immediately the Legal Department in case of any non-routine request from any government authority or its representative, such as physical searches and raids, interview requests or subpoenas.

If any law enforcement agency approaches you outside of Biotest grounds in connection with Biotest or your employment with or engagement by Biotest, immediately inform the Legal Department.

The Legal Department will determine what information needs to be provided in each case. Although the Company and our colleagues may not appear to be the subject or target of an inquiry, non-routine requests may expose Biotest or individual colleagues to civil or criminal liability.

If you believe documents are being concealed, altered, falsified or destroyed, you should immediately report this to your Local Compliance Officer, the Corporate Compliance Department, the Legal Department, or through the Compliance Action Line.

11. Communication with the Media

An open and honest communication enables us to maintain integrity in our relationships with our patients, customers, shareholders and with the public and other stakeholders. We can only guarantee consistent, open and honest communication if any statement or information to the

media is properly managed and approved. If you receive an information request about Biotest from the media, an investor, financial analyst or any other outside party, you should not respond to the request. Refer all requests for information from the media or financial community to the appropriate Biotest resource or to your Country CEO.

12. Data Privacy

During normal business activities, we may collect process or use personal data about various individuals, including employees, patients, donors, customers and other persons or entities with which we do business. Biotest is committed to collecting and keeping only personal data that is legitimately needed for business or employment purposes. We treat such personal data as confidential and protect it in accordance with applicable law.

13. Political Activities

The processes for new laws and regulations which affect our areas of business are complex and diverse. There are legal restrictions on our ability to support or engage in political activities incl. lobbying. Biotest will comply with the laws regarding its involvement in any of these processes. We respect and support the right of employees to individually participate in the political process and engage in political activities of their choosing. But, it is important that your individual political activities remain separate from Biotest activity. Biotest does not wish to interfere with your private political activities as long as you

- make it clear that your views and actions are your own and not those of Biotest; and
- ensure that your personal political activities are not, and do not appear to be, related to your employment or engagement with Biotest; and
- do not use company time, property, equipment or other company resources for your personal political activity.

X. Personal Integrity

1. Conflicts of Interest

In the performance of your work, you are responsible for acting professionally and making business decisions in the best interests of Biotest without any consideration of personal gain. A conflict of interest can arise in situations where there is a risk that your personal interests will conflict or interfere with those of the Company. You must avoid situations that present – or create the appearance of – a conflict between your interests and those of Biotest. To avoid a question about our integrity, we must be able to identify and disclose potential conflicts of interest and excuse ourselves from making decisions where it may appear our independence is compromised.

You are requested to disclose to your supervisor any personal interest incl. outside employment, transactions or relationships that might jeopardize your objectivity or professionalism in the performance of your work; in particular:

- You must disclose and apply for pre-approval at your Human Resources Department before engaging in outside employment, consulting, or serving on the board of directors (or comparable position) of an external organization.
- You must inform your supervisor in advance of any investment in a competitor, vendor, supplier or customer, whether by acquiring a business activity or an equity interest (other than by buying shares in a listed company).
- Relationships may affect your judgment which can easily lead to a conflict of interest. You should not participate in an existing or potential decision involving any personal relationship. Just because you have a close relationship with a Biotest employee, business partner, customer, vendor, competitor or other third party does not automatically mean there is a conflict of interest. However, consult your supervisor to discuss the potential conflict of interest before making a decision.

2. Use of Corporate Opportunities for Self Gain

Business opportunities discovered through your work at Biotest belong to the Company and not to you. You owe a duty to Biotest to advance its legitimate business interests.

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 setting up your own business; 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

Biotest regularly transacts business with private or publicly-traded companies in which you may come across material non-public information about our Company, customers or partners during your work. Buying or selling the securities, for example shares, of a company while being aware of such information is considered “insider trading.” As a general rule, inside information includes any non-public information that may have an effect (positive or negative) on the price of a company’s shares if it were to become 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.

XI. Employment

Biotest is committed to treating our employees and everyone who is involved in our business operations with fairness and respect. Our policies prohibiting discrimination, harassment and retaliation are intended to create a workplace that promotes a positive and productive environment. We believe in cooperation, teamwork and trust, which contribute to a positive work environment. All forms of discrimination including harassment and intimidation as well as any form of hostility and violent or abusive conduct are not tolerated.

1. Human Rights

Biotest adheres to the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization. We reject any form of forced labor and exploitative child labor. Biotest will not tolerate any violation of these principles by suppliers. We expect our suppliers adhering to the minimum employment age which is valid in the country where the affected supplier maintains its business establishment.

2. Non-Retaliation

Retaliation against any employee or other person, who seeks advice, raises a concern, reports misconduct or provides information in an investigation is strictly prohibited. Biotest does not tolerate any form of retaliation against anyone who makes a report in good faith, and if it occurs it will result in discipline up to, and including, termination of employment.

If you feel that you have experienced retaliation, you should immediately report your concern to a supervisor who is not involved in the issue, the Human Resources Department, the Local Compliance Officer, the Corporate Compliance Department or contact the Compliance Action Line.

3. Environment, Health and Safety

Protecting the environment, and the health and safety of our employees, business partners assisting us in our business operations, visitors and the communities in which we operate is a business priority. We are committed to ensure compliance with all applicable environmental, health and safety (EHS) laws and internal standards. We expect you to take all necessary precautions to avoid injury or harm to you or to co-workers. It is important for you to notify your manager or local EHS function of any unsafe work conditions and practices, injuries at work and any other issues that could impact the environment, health or safety.

4. Non-Discrimination

Biotest does not permit discrimination or harassment against individuals based upon

- Race
- Religion of belief
- National origin
- Gender
- Sexual orientation
- Disability
- Age
- or any other basis prohibited by law.

The Company will fully observe obligations under applicable laws prohibiting employment discrimination, including hiring, termination, promotion and training on the basis of race, religion, national origin, sexual orientation, age and disability, and other protected characteristics.

5. Alcohol and Drugs

Our ability to perform our jobs well requires that we work in a professional manner free from the influence of alcohol or illegal drugs. These substances adversely affect job performance, and can risk our health and safety and that of others. If you suspect that a co-worker is intoxicated or under the influence of alcohol or illegal drugs, or is misusing prescription drugs, you should report the situation to your supervisor.

6. Licenses, Certifications and Other Permits

Certain duties at Biotest may require you to have a license (e.g. a driving license), certification (e.g. a technician certification), or other professional credential. You are responsible for maintaining all required credentials to perform your work. You must report to your supervisor if any needed credential is expired or revoked.

In some countries, government agencies may exclude certain individuals from participating in healthcare activities or generally activities or services related to pharmaceutical products. If you are notified that you are excluded from participation in any government program, you must notify your supervisor.

XII. 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 and especially our Intellectual Property (IP) are key drivers of our success. You must work to protect our IP including our patents, trademarks, copyrights, trade secrets, other proprietary information, know-how and expertise developed in the course of our business.

We protect our investments in intangible assets by obtaining, enforcing and defending our IP rights and by maintaining confidentiality of sensitive information.

We also respect legitimate IP rights of others. If you duplicate or misappropriate IP of someone else without authorization, you and Biotest may be subject to significant fines and criminal penalties.

3. Confidentiality, Proprietary Information and IT Security

Any information on Biotest that is not in the public domain must be protected and treated confidential, even if there is no formal obligation of confidentiality. Confidential information includes all non-public strategic, financial, and technical or business information of Biotest, as well as all business information and trade secrets of our business partners.

Much of the information that you conceive or develop as part of your job is proprietary to the Company and is a valuable Biotest asset. You must work to safeguard and protect our confidential proprietary information.

In the course of your work you may receive sensitive or proprietary information from our business partners or other third parties that is confidential. You must respect and maintain the confidentiality of such information. Do not use, disclose or share this information in a way that violates any legal or contractual obligations.

IT systems – hardware, software, networks and the information that runs on them – is critical to our business success and must be protected. Everyone who uses a computer has the responsibility to use these resources appropriately, securely and for intended business uses. You

are requested to pay particular attention to the IT aspects of confidentiality, such as data protection and data security. You must take steps to protect your computer, or other electronic device from unauthorized use or access.

These principles and obligations apply during working and non-working hours and whether or not the information is specifically designated as "confidential" or "restricted." Your confidentiality obligations remain valid if your employment with Biotest ends.

4. Social Media

Social media forms an important part of today's business, and its importance is growing. Social media are digital technologies and practices enabling people to create, share, exchange and comment on content, opinions, insights, experiences and perspectives in virtual communities and networks (for example blogs, social networks, wikis, video streaming websites etc.).

The use of social media by any Biotest employee, including any private use, could be attributed to the Company (for example by making use of Biotest logo or product names) and could negatively impact our image and reputation. Whether such use is for Company or personal purposes, you must adhere to our values and ensure ongoing compliance with applicable laws and Company policies; in particular:

- You use social media for business activity (e.g. for recruiting or public relations activities) only with approval by your supervisor or manager.
- You use discretion and common sense regarding the potential consequences of your social media use.
- You refrain from using social media to discuss issues that involve Biotest confidential and proprietary information.
- You are open and honest about your affiliation with Biotest when it is relevant to the issue.
- You make it explicitly clear that your ideas or opinions are personal, and may not represent the position of Biotest.