

Code of Conduct of Heidelberg Pharma AG and its subsidiary Heidelberg Pharma Research GmbH

The attitudes and actions of the Company's employees and how other parties perceive them contribute substantially to the reputation of Heidelberg Pharma AG and its subsidiary.

It is for this reason that the Group has adopted a Code of Conduct that sets out stringent requirements for correct business conduct. This Code of Conduct shall guide the conduct of Heidelberg Pharma as a company towards external parties and customers (referred to as "business partners" below) as well as that of its employees towards colleagues; it must be accepted and signed by every employee at the start of employment. Every employee of the Company must be aware of these rules and regulations and act accordingly in their daily dealings with business partners and colleagues alike.

Heidelberg Pharma AG and its subsidiary Heidelberg Pharma Research GmbH (Group) desire under all circumstances to adhere to letter and spirit of the law.

1. Drug development: Heidelberg Pharma's activities in the field of drug development are subject to extensive governmental regulations, installed to protect patients and enhance the standards in healthcare. Heidelberg Pharma's policy is to adhere to the letter and the spirit of the laws and guidelines in this area. Any employee who notes a deviation from this policy in this area is obliged to alert his supervisor and the responsible member of the Executive Management Board immediately.

2. Protection of employee safety and welfare: In view of safety and a healthy work environment the law and any internal rules of Heidelberg Pharma regarding safety and hygiene must be complied with.

3. Environment: All rules and regulations regarding the handling of chemicals, organisms and waste products have to be observed. In general, the Company expects its employees to act responsibly towards the environment, also where no mandatory rules apply.

4. Political and religious activities: Although Heidelberg Pharma respects the political or religious opinions of its employees, promotion of political or religious views is not allowed, by any means, on the Company's premises. Nor is the support of political parties or religious denominations with financial means from the Company allowed.

5. Unsuitable social activities: The distribution, promotion or duplication of racist, sexual or discriminatory opinions and materials of any kind is not allowed within Heidelberg Pharma or through the use of the Company's infrastructure like email or copiers.

6. Behavior of employees within Heidelberg Pharma: Employees of Group shall at all times treat their colleagues with appropriate respect and shall not discriminate any of their colleagues in writing, verbally or any other form with regard to sex, race, handicap, political or religious opinions. The requirements of the German General Equal Treatment Act (Allgemeines Gleichbehandlungsgesetz) dated 14 August 2006 must be observed.

7. Protection of confidentiality: The Group respects any confidential information received from third parties in the conduct of its business. Such information will be protected as Heidelberg Pharma's own confidential information will be. The employees of Heidelberg Pharma are only allowed to use information rightfully obtained and are not allowed to use confidential information received in other ways than for the intended purpose.

8. Information policy: Any information regarding financial conditions, progress in clinical or product development, patent situations etc., provided by the Company's management or employees to third parties must be consistent with the actual situation. The disclosure of information to third parties by individual employees may only take place within the scope of the respective area of activity of the employees concerned and must always be coordinated with the respective superior or with the management. Heidelberg Pharma AG's management is responsible for providing updates on a regular basis to entitled parties within the Group.

9. Conflict of interest: The employees of Heidelberg Pharma at all times must avoid situations of conflict between company and personal interests. Where such situations exist or may occur the employee is responsible for immediately disclosing such conflicts of interest to a member of the Executive Management Board. Examples of situations to be avoided are: acceptance of presents, payments, loans or services of any kind by suppliers, customers, organizations, service providers or competitors in excess of what is customary in such cases, e.g. a normal business meal or a small present at the end of the year (less than €25). Employees should also avoid doing business with former colleagues except when only Heidelberg Pharma business reasons are involved. In no case are the Company's employees allowed to use information obtained at Heidelberg Pharma for personal financial gain or for the benefit of family relations and friends.

10. Doing business: Interactions between Heidelberg Pharma and third parties will take place only according to legal and lawful practice. In case of major transactions multiple quotations will be compared to obtain the best possible deal for the Company. In no case will Heidelberg Pharma accept payments that have been made to illegally avoid taxation. The Company will not make any payments that are not legally due or that contradict existing law or the intention of the law. Equally, no payments will be made for a purpose that is different from that stated on the invoice.

Adhering to the rules and guidelines above will help Heidelberg Pharma to be a reliable, responsible and respectful partner for those who do business with the Company as well as for its employees.

Furthermore, there is an information memo on insider law, which every employee receives and must observe.

Ladenburg, 28 January 2022

For the Executive Management Board:



Dr. Jan Schmidt-Brand
Chief Executive Officer & Chief Financial Officer



Professor Andreas Pahl
Chief Scientific Officer

For the Supervisory Board:



Professor Christof Hettich
Chairman of the Supervisory Board