

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

The Heidelberg Pharma Code of Conduct provides employees with orientation and refers to guidelines regarding the fundamental ethical and social standards within the company. It is intended to regulate both dealings with each other and external behavior. All persons working in the company, including the Management Board and Supervisory Board, should observe the Code of Conduct and act accordingly. It is not only business success that counts, but also the way we behave and treat each other.

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 encouraged to alert his supervisor and the responsible member of the Executive Management Board immediately. A report can also be made anonymously via a web-based system ("whistleblower system").

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.

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.

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.

Discrimination: It is forbidden to distribute, promote or duplicate racist, sexual or discriminatory opinions and materials of any kind within Heidelberg Pharma or through the use of the Company's infrastructure like email or copiers.

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 24 December 2022 must be observed.

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.

Insider trading: Important and share price-relevant information ("insider information") is treated with particular care at Heidelberg Pharma. As long as this type of information is not published, all employees who are aware of it must treat it confidentially and may not use it for their personal benefit. No share transactions involving Heidelberg Pharma shares may be carried out on the basis of insider information and this information may not be passed on to

third parties. Upon signing the employment contract, each employee receives an information memorandum on insider trading law.

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.

Conflict of interest: The employees of Heidelberg Pharma 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.

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.

With the rules and guidelines described here, Heidelberg Pharma aims to contribute to being a reliable, responsible and respectful partner to its employees as well as to all those who are in business contact with the company.

Ladenburg, 1 February 2024

For the Executive Management Board:



Professor Andreas Pahl
Chief Executive Officer



Walter Miller
Chief Financial Officer

For the Supervisory Board:



Professor Christof Hettich
Chairman of the Supervisory Board