



Intelligent Biopharmaceutical Solutions

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# Code of Conduct



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### Note on language use:

For better readability, gender-neutral language is not used in this document when referring to legal entities. References to persons apply equally to all gender identities, regardless of the form chosen, and are to be understood as gender-neutral.



## Objective

This Code of Conduct sets out the ethical principles and rules of conduct that are binding for all ProBioGen employees and business partners. The aim is to create an ethical, fair, and responsible working environment that complies with both legal requirements and our internal corporate values.

## Our Vision & Mission

ProBioGen pursues the vision of a world in which there is a treatment for every disease. To achieve this, ProBioGen is enabling the development of tomorrow's medicines today – even for diseases that are currently incurable. We do this with all our knowledge and technologies.

## Our Commitment

Our values are aligned with our mission and define our corporate culture.

The rules of conduct set out here guide us in our day-to-day business and in strategic decisions; in our dealings with each other, with our customers and partners, with authorities and other stakeholders.

## Our Values

We act according to these values every day:

### **Innovation**

Our innovative strength arises in an environment in which employees across departments are engaged and develop in an appreciative and challenging corporate culture, where they can come up with new ideas and put them into practice. For us, innovation means actively pursuing new paths to advance our mission.

### **Passion**

For us, passion means putting our hearts into our work, identifying with our profession, our company, and our mission.

### **Partnership**

The way we interact within our company, but also with customers, suppliers, and other business partners is characterized by respect, reliability, honesty, and trust.

### **Solution-oriented**

We find the best possible solutions – for our customers and for our organization. With agility, openness, and a focus on quality, we achieve optimal results.

### **Fearless**

We stand by our decisions and actions. When others ask "Why?", we respond "Why not?!" We are inquisitive, responsible, and fearless.



# Innovation





## Our Code of Conduct

### Legal Compliance

ProBioGen is committed to complying with applicable laws and takes all appropriate measures at all times to proactively identify and implement changes in legislation. Only by actively practicing legal compliance can we protect the trust of our customers, partners, and colleagues and secure the future of our company.

All ProBioGen employees are responsible for familiarizing themselves with the relevant legal requirements, regulations, and company guidelines and for complying with them at all times. Violations of the law or reasonable suspicions are reported immediately and responsibly to management or the relevant authorities.

### Quality

The high quality of ProBioGen's developments, services, and products is based on a deep scientific understanding of development processes, extensive experience in pharmaceutical manufacturing and analysis processes, and a drive for continuous improvement. Our quality management system fully complies with regulatory requirements and is tailored to customer needs.

We are committed to clearly defined, shared quality objectives, which we consistently adhere to and continuously develop. All employees actively contribute to ensuring these quality standards. Deviations, risks, and unplanned events are carefully noted, handled responsibly, and immediately reported to the relevant managers or responsible departments. We promote a culture of continuous improvement: everyone is encouraged to contribute suggestions for improvement and to actively participate in their implementation.

Further information: Quality Management Manual

### Business Relationships with Customers and Other Stakeholders

ProBioGen is a reliable, trustworthy, and highly experienced partner for all customers in development, manufacturing, and analysis. The services and products developed are part of achieving the respective goals of our customers and support their success. ProBioGen maintains ethical relationships with all our stakeholders.

We do everything in our power to meet our customers' requirements to the fullest extent possible and achieve outstanding results. We always ensure excellent customer service. Our cooperation is characterized by transparency and mutual trust. We act responsibly, respectfully, and ethically toward all stakeholders in the spirit of long-term partnerships and sustainable success.

### Business Relationships with Suppliers

Our suppliers are important partners for our success. We only enter into business relationships with suppliers who have been carefully selected and are contractually bound, and who share our commitment to quality, customer service, sustainability, equal treatment, and ethical business practices.

We examine business relationships with suppliers with due diligence. In doing so, we pay particular attention to ensuring that our business partners adhere to ethical principles and responsible business practices. Business relationships are entered into exclusively on the basis of fair, transparent, and appropriate contractual agreements.

Further information: Law on corporate due diligence in supply chains.



## Research and Development; Intellectual Property

ProBioGen is a technology developer with the goal of contributing to more effective disease control and easier access to modern medicines through inventions in production processes and new and improved active ingredients. Innovation in all areas is firmly anchored in ProBioGen's DNA. We are committed to thoroughly reviewing and questioning research results and ensuring the integrity of data. ProBioGen respects and protects the intellectual property of third parties (restricted access) and refrains from any activities that would infringe on such property.

We continuously seek improvements within our sphere of influence and beyond. We respect and protect the intellectual property of ProBioGen and that of our customers. We share inventions and new findings with the company so that they can be protected. We are committed to conducting all research and development activities while respecting the rights of third parties, complying with high safety standards, and ensuring high data quality and integrity.

## Scientific Publications

As a research-based company that develops its own technologies and platforms, scientific communication is an important part of our work. Our scientific publications are based on carefully collected, unmanipulated data. Co-authors are named according to their actual contribution in accordance with the recommendations of the ICMJE (International Committee of Medical Journal Editors).

We ensure the accuracy of our research results – false or misleading statements in scientific publications are not tolerated. Ghostwriting or inappropriate author attributions are excluded.

## Combating Corruption and Bribery, Business Gifts and Entertainment

ProBioGen does not promise, offer, pay, or receive anything that could influence decisions or actions. Business gifts of more than negligible value (> EUR 35.00 gross) are neither received nor given. Other benefits such as events or business meals must be appropriate.

We avoid any direct or indirect activities that could have an inappropriate influence on decisions or actions. We do not accept any inappropriate benefits. Gifts with an individual value exceeding EUR 35.00 gross are only acceptable with the express permission of management and complete documentation.

## Social Media and Public Relations

ProBioGen makes extensive use of social and other media to promote awareness and reputation. The information provided to the media for this purpose is accurate and consistent. The Marketing & Communications (MarCom) department of the Clients, Commercial & Communications Office (CCoCo) is responsible for public relations.

We forward all inquiries from journalists or other interest groups to [press@probiogen.de](mailto:press@probiogen.de). We do not make inaccurate or irrelevant statements about ProBioGen and behave respectfully and responsibly, especially when we can be associated with ProBioGen.

## Political Activities

ProBioGen respects the right of all people to participate in political activities at their own expense and in their free time.

We do not participate in political activities on behalf of ProBioGen. We do not make donations to parties or political organizations on behalf of the company. When we engage in political activities,



we take great care not to give the impression that we are acting or speaking on behalf of ProBioGen.

Further information: Basic Law of the Federal Republic of Germany

## Fair Competition

ProBioGen participates actively in competition. This is done on the basis of the applicable competition law provisions.

We avoid any activity that leads to actual or perceived collusion with competitors or violates competition law provisions.

Further information: Directive 2005/29/EC of the European Parliament and of the Council of May 11, 2005

## Trade Sanctions and Export Controls

ProBioGen complies with all legal regulations on export control and other trade laws.

We ensure that every delivery of items (goods, technologies, and other services) is carefully checked to ensure that all applicable rules are complied with.

Further information: afk\_merkblatt\_exportkontrolle\_bafa.pdf from [www.bafa.de](http://www.bafa.de)

## Anti-Discrimination and Equal Employment Opportunities; Inclusion; Human rights

ProBioGen has established a corporate culture that excludes discrimination or other forms of disadvantage in any way. We respect the dignity and individuality of every human being. We are committed to respecting human rights and the ethical principles of equal treatment.

We respect all employees regardless of age, ethnic origin, nationality, gender and gender identity, physical and mental abilities, religion and worldview, sexual orientation, or social background. We do not engage in any form of discrimination, harassment, disadvantage, or aggression in the workplace, nor do we tolerate such behavior.

Further information: please contact the diversity officer(s) or trusted representatives

## Environment; Health; Safety; Sustainability

ProBioGen protects all employees from harmful influences. We promote environmental and sustainability awareness and select partners who share our commitment to these issues.

We are committed to occupational safety, health protection, and environmental protection at all times. If we discover a violation of the applicable rules in the company, we report it immediately to our manager or the relevant responsible authorities. We actively contribute suggestions for improvement and participate in their implementation.

## Conflicts of Interest

ProBioGen conducts its business in a manner that ensures that decisions can be made objectively and free from inappropriate personal interests. Personal interests also include the interests of related parties.

We always act in the interests of ProBioGen and refrain from any activities that could lead to conflicts of interest between personal and company interests. If we encounter conflicts of interest, we report them immediately to our superiors.



## Use and Protection of Tangible and Intangible Assets

ProBioGen provides extensive tangible and intangible assets for the conduct of its business activities.

We are committed to the careful and sustainable use of all tangible and intangible assets.

## Confidential Information, Responsible Handling of Information

Our experience and knowledge are the building blocks of our success. Information is extremely valuable and we protect it carefully. We maintain confidentiality. Information must be correct to the best of our knowledge and belief.

We do not disclose any confidential information from ProBioGen or our business partners. We protect this information through appropriate security measures, such as restricted access, secure storage, and confidential treatment. We handle all records carefully and conservatively. We do not knowingly record false information and do not pass on such information.

## Data Protection

ProBioGen respects the right to privacy of employees, applicants, business partners, and other individuals.

We protect personal data and collect, process, and use it exclusively in a lawful, fair, and transparent manner.

Further information: Data Protection Officer, Information on Data Protection Intranet

## Data Integrity

Our customers rely on our data. The reliability and trustworthiness of the data, records, and information we generate is the basis for our actions and thus for our developments and products, not only from a regulatory perspective.

We comply with all applicable regulatory provisions to ensure data integrity throughout the entire data lifecycle. We report any manipulation – intentional or unintentional – to management immediately.



# Solutions



## Implementation and Enforcement

### Each of us is responsible

While laws, guidelines, and procedures may vary from country to country or region to region, these ethical principles apply worldwide. All employees must comply with this Code of Conduct. We ensure that third parties performing work on behalf of ProBioGen understand and comply with this Code of Conduct.

### Each of us has a voice

You may become aware of an action or behavior that deviates from this code of conduct. In such situations, you are encouraged to address it.

### Each of us has help

This Code of Conduct serves as the basis for all of our commitment as employees at ProBioGen. It is intended to provide certainty regarding the ethical expectations placed on all of us. If you have any questions, please contact your supervisor or the management team.

## Maintenance

We take all reports of potential violations seriously and initiate objective, thorough, and timely investigations.

Retaliation against employees who raise concerns in good faith is strictly prohibited, regardless of whether the concerns prove to be justified.

Speaking up about what is or seems to be wrong helps ProBioGen take action, resolve issues appropriately, continuously improve, and achieve sustainable success.

We report violations of laws, this Code of Conduct, policies, or procedures to one of ProBioGen's available reporting channels. When a concern is brought to my attention, we listen and act by being receptive to information, maintaining confidentiality, emphasizing non-retaliation, and referring the matter to the appropriate person for further action.

## When in Doubt

No document can cover every situation you may encounter. A document is no substitute for good judgment.

There may be times when you are unsure of what to do. If you find yourself in such a situation and need to make a decision or take action, ask yourself the following questions:

- Is it legal?
- Is it consistent with this Code of Conduct and company policies?
- Would I feel comfortable if it became public knowledge?
- Does it feel right?

If you can answer "yes" to all of these questions truthfully, you are on the right track. If you have to answer "no" to any of these questions or are unsure, please contact your supervisor or another trusted person in the company.