



richterpharma

Providing a Healthy Lead

Code of Conduct of Richter Pharma AG

www.richter-pharma.com

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Company policy of Richter Pharma AG and its subsidiaries (collectively referred to in the following document as "Richter Pharma").

For reasons of better readability, the simultaneous use of the language forms male, female and diverse (m/f/d) is dispensed with.
All personal designations apply equally to all genders.

CODE OF CONDUCT

Values of the employees !

Richter Pharma is an international company with the values of a family business. Consistently adhering to these values and putting them into practice has enabled our company to achieve success and expand. As a manufacturer and service provider in the health sector, we stand for a long-term and sustainable business orientation. As a reliable partner, we also feel a sense of responsibility for how we deal with our customers, suppliers, employees and business partners.

Our employees are an important factor in our company's success, the trust that is placed in us and our reputation on the market. They should make decisions independently and autonomously and help to shape the company. For precisely this reason, we believe that it is important to lay

down clear principles and rules for our business activities.

This Code of Conduct is a guideline for ethically correct behaviour in line with our values and corporate principles. We expect every employee of our company to observe and comply with the Code of Conduct. That is non-negotiable. If you have questions, please contact your manager or the HR department.

Thank you for your support!



Roland Huemer

Mag. Roland Huemer



INTRODUCTION AND OBJECTIVES

Introduction and objectives

Because of its diverse and international activities, Richter Pharma is subject to a wide range of social, political and legal frameworks that must be observed. Violations of these frameworks, in particular violations of a country's legal order, can cause considerable financial detriment to the company and result in lasting damage to its reputation.

We introduced this Code to inform you about our standards for business conduct and to help clarify any ethical issues that may arise in the course of your work. This Code cannot address all the ethical situations and problems that you may face in the course of your work. We encourage you to seek advice about ethical and legal questions. If you are unsure of the best way to proceed or respond in a situation, you can discuss this with your line manager. If you are uncomfortable raising the matter with your line manager, you are welcome to contact the HR department or the works council.

“ By specifying a Code of Conduct, we are creating a sound basis for ethical conduct for all of our employees.

Please note that any employee who wilfully or negligently violates laws, internal regulations and instructions (SOPs) or provisions of this Code of Conduct must expect disciplinary consequences. Such violations may also lead to consequences under civil or criminal law, e.g. recourse claims and claims for compensation, for the employee in question. The Code of Conduct will be updated by a resolution of the Executive Board when necessary.

SCOPE

Scope

This Code of Conduct applies equally to the Executive Board, the CEO, managers, members of the supervisory board and employees (hereinafter “employees”) of Richter Pharma AG and its wholly owned subsidiaries.

Responsibility for implementation

Every single one of our employees is responsible for complying with and implementing the Code of Conduct. Our managers set an example when it comes to putting the contents into practice and are also responsible for instructing their subordinates on how to deal with the Code of Conduct. When interpreting the rules of the Code of Conduct, please also let yourself be guided by common sense and ask yourself whether a specific act could lead to a violation of these rules on the basis of reasonable ethical and moral standards. When laws exist, there is no margin of discretion. If anything is unclear or you have questions, your line manager is available to provide advice and assistance. You can, of course, also contact the HR department. In the event of disputes or matters of interpretation, our legal counsel is the supreme authority for the binding interpretation of the Code of Conduct.

Compliance with laws and other external and internal regulations

Richter Pharma and its employees are bound by the law. As an employee, you have an obligation and a responsibility to obtain sufficient information about the applicable laws, internal regulations and instructions in specific situations. With the help of our internal quality management system SOP-Guard, we map out all the binding regulations and SOPs (SOP = standard operating procedures).

You shall also help with internal training courses and instruction about legal frameworks. These must be appropriate for the specified target groups. Compliance with all the applicable laws and directives must not be put at risk. The same applies to compliance with all the internal regulations and policies.



FAIR COMPETITION

Fair competition

At Richter Pharma, we are fully committed to fair business practices and to fair competition. We conduct our business in an ethically and legally impeccable manner and expect all our business partners to do the same. We do not make agreements with our business partners or competitors regarding prices or conditions, market sharing, capacity, or dividing up customers. We expect you not to make such agreements either.

Memberships of and activities in associations, professional bodies or other industry organisations may provide an important basis for the representation of the interests of industry and business groups. Members of such associations, professional bodies or industry associations are, however, generally competitors. In this context, it is your duty to have memberships of such organisations approved by the Executive Board.

“Richter Pharma is fully committed to fair competition with all its business partners, thereby earning respect and trust.”

CORRUPTION/BRIBERY/ ACCEPTANCE OF GIFTS

Corruption/bribery/acceptance of gifts

Giving and accepting gifts can create the impression of a conflict of interest and may potentially compromise our decision-making or that of our partners. Therefore, we must exercise caution when we exchange gifts or issue or accept invitations to meals and other invitations. No employee should offer, grant or accept a gift, invitation or other favour that will influence the judgement of one of the partners or could even just give the appearance of such an influence. This must be observed particularly strictly with respect to government representatives or public officials.

Such benefits (bribes) damage our reputation and breach applicable laws, regulations and our policies and guidelines. The value limit for meal invitations is based on the Pharmig Code of Conduct and the ARGE TAM Vet Code; this is currently €85 (as of April 2026). The value limit for promotional items is based on the ARGE TAM Vet Code; this is currently €15 (as of April 2026). The hospitality of accompanying persons is not permitted. Should you be faced with an unclear situation, please inform your line manager.

Offering or accepting money or benefits of monetary value is strictly prohibited. For events with participants from professional circles, please observe the provisions of the Pharmig Code of Conduct or the ARGE TAM Vet Code, as well as the division-specific SOPs, which may be interpreted more strictly where applicable.



DONATIONS AND SPONSORING

Donations and sponsoring

Richter Pharma is committed to exercising its social responsibility in a variety of ways. Monetary donations and donations in kind, especially to support humanitarian and social projects, as well as cultural and scientific institutions, and for education can be made with the approval of the Executive Board. Richter Pharma also sponsors selected charitable projects. Such payments must on no account be made for the purpose of circumventing other provisions of the Code of Conduct or applicable policies.

Richter Pharma does not make donations of any kind or provide any other form of financial support to politicians, political parties or organisations affiliated to political parties. This includes placing advertisements in media owned by a political party or by organisations affiliated with political parties. With regard to donations and subsidies in the context of a collaboration with professionals and institutions from the industry, we subscribe to the Pharmig Code of Conduct.

Money laundering

Various nations and communities of nations, including the USA and the European Union, have passed laws and directives against money laundering. The specifications in the EU anti-money laundering directives are transposed into Austrian laws.

All employees are prohibited from taking measures, either on their own or in collaboration with third parties, that violate the anti-money laundering regulations. Money laundering refers in particular to channelling the proceeds of crime, whether in the form of money or other assets, into the legal economy (e.g. by conversion or transfer).



CONFLICTS OF INTEREST

Conflicts of interest

A conflict of interest occurs if the personal interests of an employee or the interests of a third party are competing with those of Richter Pharma. In such a situation, it may be difficult for you to protect the interests of Richter Pharma. As it is not always possible to rule out such situations, Richter Pharma requires its employees to handle such issues transparently.

In the event of a conflict of interest or if you are facing a situation that involves, or could lead to, a conflict of interest, please inform your line manager or the HR department immediately. In the interests of a fair and transparent solution that is appropriate to the situation, you must ensure that the works council is informed. Conflicts of interest can arise in connection with the following aspects in particular:

- Secondary employment may conflict with the obligations towards Richter Pharma or lead to a conflict of interest. Therefore, secondary employment with competitors or business partners, especially customers or suppliers, is prohibited. In any other case, the secondary employment must be approved in writing by the line manager in advance, informing the HR department.
- Commercial involvement with competitors or business partners of Richter Pharma, especially customers or suppliers (exceptions are small holdings in listed companies, insofar as such holdings are within the scope of ordinary asset management), is not permissible. If close relatives have such holdings, inform your line manager of this with evidence. Close relatives include your spouse or life partner, your parents, siblings and (step)children.



FAMILY AND RELATIVES

Family and relatives

In staffing decisions, we always strive for fairness and objectivity. Close relatives and partners of employees may only be employed or engaged as consultants if the decision is based on their qualifications, performance, capabilities and experience. These principles of fair treatment apply to all aspects of employment, including remuneration, promotion and relocation. The principles also apply in cases where the relationship with direct or indirect reporting develops after the employee in question joined the company.

Staffing decisions and working activities can become a complex matter if employees and their line managers are related or have another kind of close relationship outside work. A conflict of interest may arise if you have a direct or indirect reporting relationship at Richter Pharma with a relative or a person with whom you have a close private relationship. You should disclose any such reporting relationship to your line manager in order to find an appropriate solution.

Provided that they are just as qualified as the other candidates, children of Richter Pharma employees may be taken into consideration for internships, apprenticeships, holiday jobs and similar kinds of short-term employment.





DATA PROTECTION

Data protection

Richter Pharma processes the personal data of employees, customers, patients and other business partners in the course of its business activities. The processing of personal data (e.g. the collection, use, disclosure, publication and storage of such data) is only subject to the provisions of the EU General Data Protection Regulation (GDPR) and the national legislation. You have an obligation to handle personal data carefully and conscientiously in all situations.

Protection of information and intellectual property

Unless prescribed by law or approved at a management level, employees must not disclose confidential information or allow such information to be disclosed. This includes business secrets, research and development work, formulas, manufacturing processes and personal data as well as all information that is not public knowledge or that is expressly designated as confidential. This obligation will continue to exist after the end of your employment at Richter Pharma or one of its subsidiaries. You also have an obligation to avoid accidental publication by exercising particular caution when storing and forwarding confidential information. Richter Pharma respects efforts by third parties to protect confidential information. If third parties such as business partners, suppliers or customers share confidential information with Richter Pharma, we expect you to treat this information with the same care as you would the company's own confidential information. To this end, it is often sensible to conclude a confidentiality agreement with the potential business partner.

Protection of company property and IT usage

Employees must use the property and resources of Richter Pharma carefully and appropriately and protect them against loss, theft or misuse. Communication systems such as the internet, the intranet and email, and the work equipment, serve the operational requirements. If business-related data is stolen or cannot be traced, report this to your line manager immediately. If this relates to electronic data, you must block the access rights or take other appropriate steps immediately in consultation with the IT department.

SAFETY AT WORK

Safety at work

The health and safety of the employees is the top priority for Richter Pharma. This is reinforced by regular evaluations and various preventive and health-related measures. As an employee, you are required to obey the safety standards as well as the policies and regulations relating to occupational health and safety. This also applies to companies commissioned by Richter Pharma and their employees.

Discrimination and harassment

We respect the personal dignity, privacy and personal rights of each employee and undertake to achieve a workplace that is free from discrimination and harassment. Therefore, any discrimination or verbal or physical harassment on account of someone's origins, nationality, religion, ethnicity, disability, gender, age or sexual orientation is unacceptable.

Austrian Whistleblower Protection Act

In accordance with the Austrian Whistleblower Protection Act, an internal unit has been set up at Richter Pharma for reporting concerns about the violation of regulations in the following areas:

- Public procurement
- Financial services, financial products and financial markets, and the prevention of money laundering and terrorist financing

- Product safety and conformity
- Road safety
- Environmental protection
- Radiation protection and nuclear safety
- Food and feed safety, animal health and animal welfare,
- Public health
- Consumer protection
- Protection of privacy and personal data as well as security of network and information systems

This internal unit consists of Christoph Marquant and Georg Kollmann. As a designated unit for these concerns, they are required to protect the identity of the whistleblower. It is also their responsibility to dismiss concerns that do not fall within the scope of the Act.

If you have concerns, you can contact the two people in the unit confidentially by telephone, by email or in person.

Contact:

Christoph Marquant

Tel.: 0664/ 20 22 895

or

Georg Kollmann

Tel.: 0664/ 84 55 370

Email:

hinweis@richter-pharma.at

Corporate communications

All press releases and other information intended for the public are released exclusively via the Executive Board or the corporate communications department. This applies to both traditional and digital communication. Forward enquiries from journalists and other external stakeholders to the corporate communications department.

Reporting misconduct

It may be that you, as an employee, discover that you or other employees have violated provisions of the Code of Conduct, other internal policies and regulations, or the law. We take all reports of potential compliance violations seriously and conduct any investigations that may be necessary. Addressing concerns helps Richter Pharma to take action and to find appropriate solutions to problems. If concerns are brought to you, listen and take action by absorbing the

information, treating it confidentially, stressing that retaliation is prohibited and reporting the situation.

The following options are available for this:

- Informing your line manager
- Informing the HR department
- Informing the head of the respective business unit
- Informing the works council

In order to promote open and trusting communication, we expressly state that employees who report violations of laws, the Code of Conduct, or other internal policies and regulations that they have discovered shall not suffer any kind of negative consequences. However, Richter Pharma expressly reserves the right to take disciplinary action against employees who violate the policies or laws through gross negligence or wilful intent.





COMPLIANCE

Are you unsure?

We realise that this document cannot cover every situation that may be relevant to you and your work. We always rely on your loyalty and your sense of responsibility. You may be unsure what to do. Some things are not always immediately apparent or clear. Always get advice in these situations.

Before making a decision or taking action, ask yourself the following questions:

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

If you can honestly answer “yes” to these questions, you do not need to have any doubts. If you have to answer “no” to even one of these questions or are not sure, please contact your manager.

Final provisions

The Richter Pharma Code of Conduct entered into force from 1 May 2026. The Richter Pharma Code of Conduct is published on the intranet and on the website. New employees are informed about the content of the Code of Conduct. The Code of Conduct must be revised every two years and amended as required.





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