



CODE OF CONDUCT

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PharOS' Code of Conduct

Our Code of Conduct (*hereinafter referred to as "the Code of Conduct" or "the Code"*) defines our principles, values at work, and guides our behaviors. It comprises the rules of corporate governance and corporate Policies of PharOS Pharmaceutical Oriented Services (*hereinafter referred to as "PharOS" or "the Company"*).

We conduct our business according to relevant laws, regulations, and policies that frame the pharmaceutical sector. Through our Code of Conduct we further promote business ethics and foster honesty, integrity, transparency, accountability, and professionalism. We expect our people, irrespective of level and job description to act with integrity and responsibility and alongside our employees we expect our partners, suppliers and other third parties to respect and adopt our work principles.

Integrity, Responsibility and Ethical Standards

At PharOS we act with integrity, responsibility, and ethical standards because we develop pharmaceutical products for our customers and their patients. These values guide us in making the right decisions both internally and externally.

Quality: We focus on delivering results of high standards to our customers, patients, and healthcare providers in a consistent, efficient and reliable way. We meet the pharmaceutical industry's demanding requirements while ensuring the success of the most challenging projects.

Patient-centered approach and Customer satisfaction: We take on the responsibility of delivering products of high standards that affect the quality of life of patients.

Growth: We can only ensure growth by keeping high integrity, responsibility, and ethical standards. We expect everyone, in all our business relationships, to act with accountability and professionalism.

Product Continuity, Vigilance, and Research & Development

We follow the laws, regulations, codes, guidelines, and good practice standards related to safety, quality, research, and bioethics to deliver work which is not only legal but also ethically justified. We ensure that our products will be among the first to be launched after patent expiry and the last ones to exit the market ensuring the trust of our customers.

We follow the manufacturing protocols and quality standards rigorously and all manufacturing operations and practices are in compliance with applicable regulatory requirements.

We require that suppliers and partners also operate in compliance with applicable regulatory requirements. We conduct audits to ensure the quality and safety of the manufacturing process and our products.

We believe in delivering high-quality, value-added solutions across our products and services and fostering a culture of continuous learning. We invest in Research and Development (R&D) and conduct scientific research to drive advancements in healthcare.

Data Integrity

Safety Integrity & Reporting

As a science-based Company, the integrity of our data is critical. Accuracy, completeness, and trustworthiness all assure regulators, and customers on the safety, effectiveness of our products and manufacturing processes. We provide safety information for our products and manufacturing process that is transparent, relevant, comprehensive, and timely.

Personal data

We protect personal data, including that of colleagues and third parties and we undertake appropriate measures according to the provisions of the General Data Protection Regulation 679/2016 of the European Union ([GDPR](#)). Aiming the attunement with the international standards and best practices, the Company maintains a Personal Data Protection Policy and establishes concrete procedures defined within the Policy for the protection of personal data throughout all activities.

Any confidential information, trade secrets or other proprietary information about our Company, products, contracts, projects, financial position, customers, suppliers, and co-development partners is treated as confidential information. Such information shall not be disclosed to employees or any person or legal entity outside the Company without proper authorization. Our employees are required not to disclose confidential information to any third party and to use the utmost discretion when dealing with confidential information. This stands for the duration of their employment with PharOS, as well as after the termination of employment.

IT Security

The security and integrity of our IT systems is fundamental. Personal and business-related data is protected against unauthorized access, loss, or manipulation using all means available. This is in compliance with the national regulations.

Protection of Company's Property

PharOS' assets and property include both physical assets (i.e. production equipment, tools, computers, facilities) and knowledge-based assets (i.e. trade secrets, inventions, RnD information, know-how, processes, techniques, formulas, manufacturing, accounting, financial, pricing procedures). Employees are required to handle Company property in a responsible manner and to protect PharOS' assets against loss, theft, misuse, unauthorized use, dissemination and damage, as any unauthorized disclosure could destroy PharOS' value or help others develop a competitive advantage over the Company.

Transparency in Accounting and Reporting

PharOS provides disclosures that are transparent, relevant, comprehensive, and timely. The integrity of financial reporting is crucial to proper management and governance of the Company, as well as fair and accurate financial disclosures. All financial transactions by the Company are always reported in accordance with generally accepted accounting practices. Both internal and external data acquisition, records and reports must be correct and complete. To that end, we expect our employees and officers who prepare accounting records to exercise the utmost care in all processes, as well as to observe international standards and comply with generally accepted accounting principles.

We strive to ensure that all business records are correct and accurately reflect our work. This is a collective responsibility.

Regulatory Requirements and Compliance

The pharmaceutical industry is subject to numerous rules and regulations that protect patients, consumers and customers (B2B or B2C), improve the quality of medicines and pharmaceutical services and eliminate fraud and improper practices.

All employees, supervisory personnel, managers, officers, specialists, heads or directors and other persons acting on behalf of PharOS are expected to comply with the laws, rules, and governmental regulations and to adhere to the standards and restrictions imposed by those regulations. In cases of conflict between law and the principles contained in this Code, the law shall prevail. Additionally, all employees are personally responsible for upholding the law and complying with internal guidelines in their working environment.

Commitment to Our People

Respect for Human Rights

PharOS respects and supports internationally recognized human rights and operates with a sense of responsibility towards employees, while respecting their human rights. Within its sphere of influence, the Company ensures that it is not complicit in any human rights abuse or violations.

We are committed to ensuring a safe, inclusive, fair working environment, free from discrimination, harassment, and exploitation that promotes teamwork and trust and where all people are treated with respect and fairness. Concurrently, we are committed to respecting the dignity, freedom, and equality of all individuals, avoiding any involvement in activities that may contribute to human rights abuse.

We do not tolerate hostility, harassment, or retaliation. Through continuous diligence and transparency, we strive to ensure that our supply chains, partnerships, and services align with high ethical standards. We have created a grievance mechanism that establishes accessible and transparent channel for reporting various concerns, such as the “Speak UP service”, for raised issues to be investigated promptly and effectively. Additionally, we have a Whistleblowing Policy and an Anti-Violence and Anti-Harassment Policy that define the frame of acceptable behavior.

Prohibition of Forced or Compulsory Labor and Abolition of Child Labor

Forced and child labor are not tolerated in any way or form. PharOS acknowledges the negative impacts of forced labor, not only for the physical and mental development of the individuals subjected to such phenomena, but also for the businesses. Child labor is a form of exploitation and a violation of human rights that is recognized and defined by international instruments. The Company uses adequate and verifiable mechanisms for age verification in recruitment procedure. As part of the hiring process, employees are provided with a written employment agreement in their native language or in a language the worker understands that communicates all terms and conditions of employment.

Non-discrimination, Equal Opportunities, and Meritocracy

The Company recognizes and values differences among people and always seeks to accept and support individuals from varying backgrounds, irrespective of gender, age, sexual orientation, ethnicity, marital status, political affiliation, or disability. The Company is committed to providing a safe and healthy work environment and does not tolerate any form of discrimination against potential and current employees, whether during the hiring process, during employment (i.e. compensation, access to training,

promotion) or at termination of contract or retirement. Additionally, the Company acknowledges people's personality and skills and allocates individuals where they can best contribute.

As part of our recruitment process, the decisive factors for hiring are experience, personality, efficiency, relevant skills and qualifications. Likewise, the only decisive factor for employee development and advancement (i.e. promotion) is performance.

Teamwork and Collaboration

We are proud of our teamwork and collaboration. We feel responsibility collectively and we support each other to meet our common goals, whether one is a member of a team or the head of a team. We carefully select our people and strive to capitalize on their skills, expertise, and ideas to the best interest of their personal and professional development, as well as the growth of PharOS

Fighting Violence and Harassment

PharOS is committed to building and preserving a safe, productive, and healthy working environment for everyone based on mutual respect. We prohibit any acts or threats of violence, while conducting business on or off Company property. Harassment (including all forms of sexual harassment, racial/ethnic harassment), discrimination, domestic violence, workplace violence, bullying, rude or disrespectful behavior and lewd comments are not allowed. To this extent and to protect employees from threatening, insulting or exploitative behavior or any sort of discrimination, we consider all employees accountable for enforcing anti-violence and anti-harassment principles, to prevent discrimination and to intervene immediately if they observe a problem or if a problem is reported to them, by reporting the incident accordingly (ref. to the Whistleblowing Policy and the Speak Up Service).

Freedom of Association and the Right to Collective Bargaining

All employees have the right to join or form trade unions and to bargain collectively and we will not interfere with or obstruct the formation of unions or collective bargaining. Yet, where the right to freedom of association and/or collective bargaining is restricted under law, PharOS shall facilitate and not hinder the development of alternative forms of independent and free workers representation and negotiations.

Occupational Health and Safety

PharOS is committed to operating a safe and responsible pharmaceutical Company that promotes the health and wellbeing of its employees and minimize the negative impact on the community where it operates. The Company maintains an Environmental, Health, and Safety (EH&S) Policy and has set a standard operating procedure (SOP) that explains the Company's Policy and how it is implemented across the Company. In this context, we control hazards and take all necessary precautionary measures against occupational accidents and diseases. We provide employees with training to ensure that they are adequately educated on health and safety issues.

External Relations

Ethical Business Conduct towards Partners and Third Parties

Business relations with any third party shall be based on quality, reliability, competitive pricing, and other objective factors.

Anti-corruption and Anti-bribery

We do not tolerate bribery or other forms of corruption among colleagues or other business partners. Bribery involves using something of value to improperly influence someone. Something of value may be more than just money. Colleagues and business partners must never offer, promise, authorize, or provide a payment, benefit or something of value intended to improperly influence a government official, healthcare professional, or any other person, including commercial entities and individuals, in exercising their responsibilities.

Bribery risk exists in our interactions with anyone involved in our business, not just public officials. We do not give or accept bribes, and we do not allow third parties to do so on our behalf.

PharOS shall not offer customers, potential customers, governments, governmental agencies, or any representatives of such bodies, any rewards or benefits in violation of either applicable laws or reasonable and generally accepted business practices.

Similarly, the Company's employees shall not accept payments, gifts, or other kinds of reimbursement from a third party that could affect or appear to affect their objectivity in business decisions. We also expect our business partners to adhere to the law, generally accepted standards of social responsibility, and our basic stance towards integrity.

Additionally, PharOS maintains an Anti-Bribery and Anti-Corruption Policy that constitutes a source of guidance for our employees so as to help them recognize and deal with such issues, as well as understand their responsibilities and the frame of actions.

Prevention of Anti Money Laundering and Sanction Screening

PharOS is committed to maintaining the highest standards of integrity and compliance in all its business operations. Our Anti-Money Laundering (AML) standard operating procedure (SOP) aims to enforce strict Third Party/Customer Due Diligence (CDD) protocols to verify the identity of third parties (indicatively customers, suppliers) and monitor the business relationships and the risks to which our Company may be exposed.

Third Party Standards

Additionally, we uphold rigorous Third-Party Standards, ensuring our business partners adhere to ethical practices, including data privacy, anti-bribery, fair competition, human rights, labor rights, health and safety, and environmental compliance.

Sanction Screening

In terms of a risk management approach, Pharos conducts thorough sanction screening to avoid engagement with entities on restricted lists and comply with international legal standards, international trade sanctions and export control laws. We use tools (e.g. the Compliance Suite software) which aid in identifying risks associated with money laundering and sanctions, safeguarding our company from financial, ethical and non-compliance with best practices exposure.

Sponsorships and Donations

In line with our corporate social responsibility, we make sponsorships and donations to promote health, culture, social or humanitarian causes, and environmentally friendly behavior.

Gifts and other Gratuities

When it comes to gratuities in the form of gifts, favors or other similar benefits that can raise doubt about our integrity or appear to influence business decisions, we try to ensure that no such behavior arises.

Fraud Prevention and Money Laundering

We oppose fraud and we are determined to maintain a culture of honesty. We do not tolerate money laundering or illicit finance and comply with all relevant laws and regulations in every jurisdiction where we conduct business, based on the EU laws and regulations. We are committed to setting out the ways in which our people can voice their concerns about suspected incidents. Management has the primary responsibility for preventing, monitoring and rectifying such behaviors or potentially fraudulent behaviors and the Legal department has an oversight role over controls. The Company has established, implements, and monitors the appropriate functions and mechanisms ("Speak UP service"), Policies (Whistleblowing Policy), and procedures to prevent and remediate fraud and fraudulent behavior.

Conflicts of Interest

PharOS' employees should avoid situations where personal interests conflict, or participate, appear to participate in or exert influence on any decision that may create conflict with the Company's interest. More specifically, all employees shall conduct their private and other external activities and financial interests in a manner that does not conflict or appear to conflict with the interests of PharOS. Should such a conflict of interest arise, it shall be reported immediately by the person subject to the conflict to his/her immediate supervisor. Moreover, all employees should inform the Company of any relationship with persons or firms with whom PharOS does business which might give rise to a conflict of interest. Such relations include a relationship by blood or marriage, partnership or investment.

Fair Market Behavior

Competition laws ensure that companies operating in the free-market economy do not restrict or distort competition in a way that prevents the market from functioning properly. In this context, we are committed to promoting fair competition. Anti-competitive behavior may include:

- Entering into anti-competitive agreements with competitors, including price fixing, market allocation, or agreements to restrict supply
- Exchanging sensitive information with competitors
- Imposing restrictions on customers or suppliers

The Company bans any behavior that is aimed at, or results in, the hindrance, restriction, or distortion of free and fair competition. The Company must comply with antitrust and competition laws when dealing with its competitors, business partners, and customers. In addition to PharOS' liability, employees who engage in anti-competitive behavior will be subject to severe penalties. Our competitive edge is based on competitive advantages that relate to our unparalleled expertise in developing generic pharmaceuticals and value-added medicines and commercializing their innovation in the healthcare industry, as well as in providing a broad portfolio of products and intellectual property to leading pharmaceutical companies. PharOS may at any time be subject to any unannounced investigation by the competition authorities (called a "dawn raid"). In the event of an investigation, the Company must and will fully cooperate with the investigators and will not destroy any documents, information or data.

Stakeholder Communication

PharOS is committed to promoting and respond effectively to its stakeholders' needs and expectations. The Company acknowledges that its long-term profitability and sustainability depends on proactive and constructive dialogue with relevant stakeholders. The development of relationships that are based on mutual trust with stakeholders significantly contributes to meeting PharOS' sustainability objectives. As such, it implements communication channels and promotes effective, two-way communication, ensuring it receives complete and well-rounded information regarding the key issues, expectations, and interests of each stakeholder group.

Environmental Responsibility

Our goals are to minimize our environmental impact and as such we continuously promote environmental responsibility across our Company. Our dedication to the environment focuses on optimizing resource utilization, minimizing waste generation, and mitigating our carbon emissions. We embrace an integrated approach to environmental protection, placing a strong emphasis on sustainability throughout all aspects of our operations. The Company adopts a systematic approach in implementing energy-saving measures, by tracking and analyzing energy consumption across all facilities, upholds rigorous waste disposal standards, and meticulously tracks and manages water consumption across all operational sites. Additionally, the Company maintains an Environmental, Health and Safety Policy and ensures adherence to all relevant legal mandates.

Implementation of the Code

Responsibility of Managers

It is the responsibility of PharOS' Management to communicate the content of the Code of Conduct, as within their business units and to encourage employees to adopt behaviors and practices that are compliant with these principles.

Responsibility of Employees

The Code of Conduct is communicated to all employees and is posted on the PharOS' website. It is the responsibility of employees to act within the guidelines of the Code.

The Code is also incorporated into training material, to deepen people's understanding and enhance awareness. Special training courses are offered to all employees (Code of Conduct, GDPR, Anti-harassment policy, anti-bribery). Likewise, each employee can contribute to the cultivation of an ethical mindset and comply with the Code's content in the context of their employment within PharOS.

Reporting Violations & Misconduct

A major principle of the Code is the obligation of employees to obtain advice whenever they are faced with doubt, when they detect potential misconduct, failure to follow laws, regulations or policies. Employees may raise concerns to their manager or via the PharOS Speak Up platform.

All employees should be aware that a breach of this Code may result in severe consequences, not only for the Company (i.e. reputational damage, harm to its market position), but also for the individuals (i.e. termination of employment contract). Therefore, if any employee believes that they are being asked to behave or act in an illegal, unethical or inappropriate manner, or suspects others within the Company of such behavior, they should immediately report their concerns through the appropriate Code of Conduct

channels. Reports are investigated and, where appropriate, remedial and enforcement actions are taken. Any act or threat of retaliation will be considered a serious violation of this Code. No employee will be penalized or retaliated against for reporting what they believe, in good faith, to be a breach of the current Code.

How to raise a concern

All employees have the right to report any violation of the Code of Conduct by using the PharOS Speak UP platform. Reports are entered directly on the Speak UP secure server to prevent any possible breach in security and individuals can choose to remain anonymous when reporting their concern.

Monitoring, Review and Code Amendments

The Code of Conduct is available in the English language and can be found on the official website of PharOS <https://www.pharosgr.gr/>

Each operating unit is responsible for full compliance with the provisions of this Code, as well as with other internal regulations within its area of responsibility. PharOS' Legal Department is responsible for ensuring that the latest version of the Code is published and is made available to all employees. PharOS ensures that any material changes to the content of the Code are to be notified to all interested parties. The Code has been approved by the Group Directors of PharOS and can only be amended or waived by the Group and any amendments or waivers shall be accordingly disclosed.

Interaction with other Codes and Regulations

The present Code of Conduct shall apply in parallel and as a supplement to the below Policies currently in force:

- Environmental, Health and Safety (EH&S) Policy
- Anti-Bribery and Anti-Corruption Policy
- Anti-Violence and Anti-Harassment Policy
- Whistleblowing Policy
- Human Resources Policy
- ESG and Sustainability Policy
- Employee Handbook
- Internal Employee Regulation

The provisions of the Code are derived from internationally recognized standards, including:

- OECD Guidelines for multinational enterprises
- UN Global Compact's 10 Principles that aim to align businesses with human rights, labor, environmental care, and anti-corruption principles
- UN Universal Declaration of Human Rights
- ILO Fundamental Conventions

Related links

[OECD - Guidelines For Multinational Enterprises](#)

[UN Global Compact](#)

[UN Declaration of Human Rights](#)

[ILO Fundamental Conventions](#)

Contact

Any general queries or comments about the present Code of Conduct should be addressed to: legal@pharosgr.gr

Should you require a status update, or need further information or clarifications upon the Code, you may raise a request via e-mail to: legal@pharosgr.gr

The Code of Conduct comes into effect immediately upon approval by the decision of 20/05/2025 of PharOS.

Document Revision Information:

Version	Amendment	Date of Approval	Policy Approval Authority	Effective Date
1.0	Initial Issue	10/07/2018	Managing Directors	10/07/2018
2.0.	Update	31/10/2024	Managing Directors	1/11/2024
3.0	Update	20/05/2025	Managing Directors	20/05/2025