CODE OF CONDUCT

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Introduction

What is the PharmaPath Code of Conduct?

The Code of Conduct (the Code) is a set of ethical guidelines that define who we are as a company and how we act and interact with our environment.
It outlines the general principles that govern responsible professional behavior and the ethical rules that all employees and partners of PharmaPath are required to follow.

The Code ensures that all PharmaPath activities are conducted with integrity, thereby protecting the organization's reputation. At the same time, it serves as a guide for how each of us understands PharmaPath's Business Integrity Behaviors.

The Code is a "living document." It evolves as laws and regulations change—although our commitment to maintaining the highest ethical standards remains constant. Any changes are communicated as soon as possible to those affected. Compliance with the Code is everyone's responsibility.
Together, we are committed to being a company that reflects the best of who we are.

Who Does the Code of Conduct Apply To?

The Code applies to all PharmaPath employees, as well as partners and consultants who represent or act on behalf of the company, whether through outsourced services or any other business activity. Employees should be aware that:

The Code and its implementation are of utmost importance, as compliance significantly contributes to achieving the company's core strategic goal: continuous and responsible growth.

The Code includes rules of acceptable behavior for PharmaPath employees, partners, and consultants in their interactions with third parties, whether individuals or entities, private or public, domestic or foreign.

The creation of the Code is guided by PharmaPath's business operations, the applicable legal framework, the high-quality services and products it provides, and the professional behavior standards it has adopted as prerequisites for conducting its business activities.

Why is the Code of Conduct Necessary?

The decisions we make and implement as individuals within our work environment affect our colleagues and the company as a whole.

The Code is necessary to ensure that all company activities are conducted with transparency, honesty, and integrity. Through our decisions and actions, we can contribute to fulfilling our commitment to promoting ethical business practices and values, improving our work

environment, earning the trust of society as a whole, and enhancing the company's reputation.

Our Values

Acting with Integrity

We build trust through transparency and full visibility, both internally and externally. We operate with ethics and respect toward our colleagues, partners, and patients.

As we continue to grow, we never forget that we serve the most important gift—human health.

Making a Difference

We are driven by ambition and passion for what we do. As a strong team, we set high goals, focus on innovation and quality across all our operations, and plan for sustainable, long-term growth. Holding ourselves to the highest standards, we continuously seek to make an impact in the generic pharmaceutical sector.

Embracing and Empowering

We bring together diverse backgrounds, skills, expertise, and perspectives, and we are committed to providing our employees with a work environment where they can continuously learn, build confidence, make decisions, and take action for their professional growth.

Our goal is continuous improvement, and our values reflect our culture.

Building Long-Term Relationships

We connect with our partners, exceed their expectations, and drive each other toward success.

Our strengths lie in our high-quality portfolio and optimal market entry for generic products, with a parallel focus on maximizing product lifecycle performance, operational excellence, and outstanding customer service. These factors help us build trusted relationships with our partners.

Our Vision

We aim to establish our position in the pharmaceutical industry by creating and maintaining exceptional value for our partners and delivering cost-effective medicines to those in need.

The passion, commitment, reliability, and business ethics of our team fuel our vision to build strong, long-term relationships with our partners and become one of the leading international providers of generic pharmaceutical products.

PharmaPath.

Our Mission

We have always aimed to follow a path of respect toward patients, service to the healthcare system, and excellence in customer and partner relations—and we continue to do so.

Honoring our pharmaceutical heritage and culture, we never stop exploring new opportunities, technologies, and advancements with the sole objective of providing high-quality, effective generic medicines to the global market.

With our expertise, services, and customer-centric approach, we are committed to supporting our partners throughout the entire lifecycle of our products. Together, we aspire to improve human health and well-being every day.

Compliance Framework

Any violation of laws, company policies, procedures, or this Code may result in disciplinary actions, depending on the severity of the violation, including termination of employment (in accordance with applicable law), especially in cases where:

- You knowingly and deliberately violate a law, policy, or procedure.
- You encourage others to violate a law, policy, or procedure.
- You fail to cooperate in a corporate investigation of potential violations.
- You retaliate against a colleague for reporting a concern or violation.

Open Door Policy

Our compliance framework is based on honesty, accessibility, and constructive dialogue. Most issues that arise can be resolved as they occur before they become larger problems for colleagues, the company, or the public.

The Open Door Policy encourages employees to propose ideas, ask questions, and raise concerns—especially regarding legal or ethical matters, as well as issues related to quality and the work environment. All managers are responsible for upholding this policy, ensuring their "doors remain open" to colleagues who may seek guidance or support.

While we hope you feel comfortable discussing any issue with your direct supervisor, there may be times when you prefer to seek an alternative channel to address concerns. If needed, we encourage you to reach out to:

- The next-level manager.
- The head of your functional unit.
- Any other company director.
- The Human Resources (HR) Department.

Equal Employment Opportunities

PharmaPath is committed to providing equal employment opportunities for all candidates and employees regarding hiring, advancement, termination of employment, and other working conditions.

Our policies require compliance with labor laws and prohibit all forms of discrimination based on race, color, religion, gender, gender identity, national origin, ancestry, age, sexual orientation, marital status, pregnancy, disability, genetic information, or any other protected characteristic under national, European, and international law.

If you witness any clear discrimination, you should report it as a violation of our Code of Conduct. Discriminatory behavior goes against the core principles of PharmaPath and may lead to disciplinary actions, including termination of employment.

Fair Compensation and Decent Working Conditions

PharmaPath is committed to providing fair and decent compensation to its employees, in compliance with applicable labor legislation, while taking into account the cost of living and the need to meet the basic needs of employees and their families.

The Company recognizes the importance of a Living Wage and strives to ensure that employees' compensation is sufficient to cover essential needs, including housing, food, healthcare, education, and transportation.

In this context, PharmaPath periodically reviews its compensation practices, taking into consideration reliable cost-of-living benchmarks, labor market conditions, and applicable legal requirements.

Protection Against Retaliation

Retaliation against any individual who seeks advice, expresses a concern, reports a violation, or provides information during an investigation is strictly prohibited. If you believe you or a colleague have been subjected to retaliation for asking for advice, raising a concern, reporting a violation, or providing information during an investigation, you should immediately contact the Human Resources Department (HR).

Harassment and Bullying

At PharmaPath, we demonstrate respect for all individuals and consider it important to maintain a workplace free from verbal or physical harassment. All forms of harassment (including all types of sexual harassment and harassment of any other legally protected category), bullying, rudeness, or disrespectful behavior, as well as inappropriate comments, are prohibited. Additionally, our Company forbids any form of threat or violence in relation to professional activities, both inside and outside company premises. Colleagues involved in harassment, discrimination, or any other form of bullying or offensive behavior are subject to disciplinary actions, which may include termination (in accordance with applicable law). Each one of us is individually responsible for maintaining a work environment free from harassment, discrimination, and bullying. PharmaPath is committed to offering a retaliation-free environment. If you experience or become aware of any form of discrimination, harassment, or retaliation, you may report it through the Company's available communication and reporting channels, in accordance with the Open Door Practice, the Policy on the

Prevention and Management of Violence and Harassment in the Workplace, and the applicable Whistleblowing Policy, as appropriate.

Environment, Health, and Safety

PharmaPath is committed to operating its facilities in an environmentally safe manner. Depending on the specific activities and duties of each employee, please be aware of local and national laws regarding environmental and safety issues, ensure the proper disposal of hazardous materials, use appropriate personal protective equipment, and report any hazardous conditions and potential health risks.

Confidentiality

It is important to feel safe when reporting any Open Door or compliance issue. Confidentiality will be maintained to the greatest extent possible. However, in certain cases, it may not be possible to maintain confidentiality regarding your identity due to the nature of the investigation, the need for a thorough inquiry, or specific legal requirements. Colleagues who are concerned about confidentiality can consider submitting an anonymous letter to the Human Resources (HR) Department. If you participate in any compliance-related investigation (for example, as a witness or whistleblower), you are expected to maintain confidentiality regarding all information related to the compliance issue. Maintaining confidentiality contributes to preserving the integrity of the process and protecting the individuals involved in the investigation. Unless prohibited by applicable law, any exceptions to confidentiality should be discussed first with the HR colleague conducting the investigation.

Combating Corruption and Bribery

PharmaPath prohibits its employees or anyone acting on its behalf from offering, giving, requesting, or accepting bribes aimed at exerting improper influence, even if only seemingly, or obtaining unfair business advantages. PharmaPath also prohibits "commercial bribery." Generally, commercial bribery is the provision, offer, demand, acceptance, or receipt of anything of value from or to an individual or company in order to secure improper advantages in conducting business activities. PharmaPath forbids direct or indirect involvement in any form of commercial bribery by any colleague or individual acting on its behalf.

Fraud Prevention

PharmaPath maintains a zero-tolerance policy towards all forms of fraud, falsification of records, embezzlement, misuse of company resources, or any other fraudulent activity that may harm the Company, its employees, business partners, or other stakeholders.

All employees and business partners are expected to act with honesty, transparency, and integrity in the performance of their duties and to comply with the Company's established internal procedures and control mechanisms.

Any suspected or actual incidents of fraud must be reported through the available internal reporting channels, in accordance with the Company's applicable Whistleblowing Policy.

PharmaPath ensures that all reports are handled confidentially and that individuals who raise concerns in good faith are protected against any form of retaliation, in accordance with applicable legislation.

Prevention of Money Laundering

PharmaPath is committed to conducting all financial and business transactions with transparency and integrity, in compliance with applicable anti-money laundering legislation.

The Company does not tolerate involvement in transactions or activities associated with unlawful financial practices and seeks to establish and maintain relationships with reputable and trustworthy business partners.

Any suspected unlawful activity of this nature may be reported through the available internal reporting channels, in accordance with the Company's applicable Whistleblowing Policy.

Gifts, Entertainment, and Other Items of Value

You and your close relatives are prohibited from offering or accepting gifts, services, additional benefits, entertainment, discounts, loans, or other items of value that are not of small value, to or from individuals who are conducting or seeking to conduct business transactions with the Company. Items of small value are allowed only if they are not offered or accepted on a regular or frequent basis and are not requested by PharmaPath employees.

If there is suspicion or evidence of a violation of this policy by a colleague, immediate communication should occur to bring it to the Company’s attention. Specifically, you can contact your Manager, the HR Department, or the Finance Department.

Conflicts of Interest

A conflict of interest arises when, in performing your duties, you place your personal, social, financial, or political interests above the interests of the Company. Any potential conflict of interest must be reported to your Manager and the HR Department or Finance Department. Below are some examples of potential conflicts of interest:

Personal Investments or Transactions

Conflicts of interest may arise if you or a family member have a significant financial interest in a supplier, competitor, or customer of PharmaPath, have an interest in a transaction known or likely to be of interest to PharmaPath, exploit PharmaPath’s business opportunities for personal gain, or receive compensation from a supplier, competitor, or customer of PharmaPath.

Personal Relationships

PharmaPath discourages the hiring of close personal friends or relatives within the same operational unit.

Romantic personal relationships between employees are also discouraged. Although these relationships may be consensual, they may ultimately lead to conflicts or difficulties in the

workplace. If such a relationship develops, it must be disclosed to the department manager or the Personnel Department.

Protection of Company Assets

The assets of PharmaPath include not only tangible and visible assets and goods (e.g., revenue, buildings, vehicles, machinery, furniture, inventory, computers, other equipment, devices, etc.) but also intangible assets (e.g., studies, ideas, know-how, etc.) developed by employees during the course of their work. These also include supplier lists, customer information, and other market-related data, as well as any other materials and information to which employees have access as a result of their work.

Every PharmaPath employee must protect the Company's assets from any type of damage (e.g., loss, theft, misuse, poor maintenance, or destruction). Damage is defined as any harm to the smooth daily operations or the reputation of the Company or any negative impact on the interests of those directly or indirectly involved.

The Company's assets or revenues may not be used for the personal benefit of employees or made available to third parties for purposes unrelated to the Company's operations. Abuse or theft of the Company's assets can result in penalties, including termination, and may lead to civil or criminal prosecution.

Competitive Information

The collection and use of business information regarding other companies must be done ethically, without violating any laws or confidentiality obligations. You must never use or ask a third party to use illegal or unethical means such as deception, fraud, theft, espionage, or bribery to gather information.

Obligation of Confidentiality

Employees are obligated to maintain absolute confidentiality regarding any information disclosed or learned during their employment at the Company. It is strictly prohibited to copy, possess, or send any company files, whether in physical or electronic form, unless required for the performance of duties as defined by the Company or Greek law.

Specifically, the Employee, whether during employment with the Company under this or any other contract, or after the termination of employment for any reason, shall not disclose to any third party or use in any manner any information or data relating to the business, operations, products, business, administrative, and financial methods and practices, research and development, future intentions and business plans, trade secrets, accounts and financial data, customer lists, policies, and matters and transactions of the Company, its affiliates or subsidiaries, or any customer of the Company that were made known to the Employee in the course of their employment or otherwise, and shall take every effort to prevent the disclosure of such information to third parties.

Privacy of Personal Data

The protection of the privacy of personal data is extremely important. Personal data refers to information that can reveal the identity of an individual directly or indirectly, such as name, contact details, health information, or other details that can identify a person. Colleagues, healthcare professionals, and many others trust PharmaPath with personal data. Research, pharmacovigilance activities, and other business activities may also provide PharmaPath with access to personal data.

PharmaPath, its business partners, and representatives are responsible for protecting personal data and processing it only within the limits of applicable laws, policies, and procedures.

You contribute to the protection of personal data privacy, including health-related personal data, by following these principles:

- Comply with the laws and regulations in the jurisdictions where personal data is collected and used.
- Collect and use only the minimum amount of personal data required for legitimate business purposes and retain it only for the period necessary to achieve these purposes.
- Share personal data only with individuals who need it for legitimate purposes and who will protect it appropriately.
- Follow the Company's guidelines on managing and destroying personal data.
- Report incidents related to information — if you learn of unauthorized disclosure of personal data, report it immediately to the Human Resources Manager and the Finance Department.

File and Information Management

Company records are any information that is recorded on any medium and reflects circumstances, events, activities, transactions, or results, created or maintained in the course of conducting business activities on behalf of the Company or serving as evidence of the Company's business or legal obligations. These records can be physical or electronic. Examples of media containing business records include paper documents (including handwritten notes), audio or video recordings, and computer-based information such as emails and electronic files.

PharmaPath implements policies and procedures for file and information management to ensure that the Company's records with personal data are maintained, stored, and, when necessary, destroyed in accordance with PharmaPath's needs and in compliance with applicable legal, regulatory, environmental, tax, labor, and commercial requirements.

The applicable corporate policies and procedures, as well as the relevant legislation, determine how long your records should be retained. Due to requests from third parties (e.g.,

government regulatory authorities) or other investigations, there may be a need to retain records beyond the prescribed period. Our policy is to retain any records related to legal disputes or governmental investigations involving PharmaPath.

If it is unclear which record should be retained or the retention period for a record is not clear, contact your Manager, the process owner of the relevant corporate policy or procedure, or the Quality Assurance (QA) Department. You can find all of PharmaPath's policies and procedures in the Company's shared folders (SharePoint). For further assistance, contact the Quality Assurance (QA) Department.

Five Simple Questions

When we have concerns that affect our daily life and we are unsure whether our action (or inaction) follows the Code, we can ask ourselves the following questions and assess how serious the issue is:

1. Are my actions legal?
2. Are my actions ethical? (Is it the right thing to do?)
3. What are the consequences of inaction? Am I allowing something wrong to continue?
4. Would I be comfortable if my actions were reported in a newspaper?
5. How would I explain my actions to others? To my children and family members? In a court of law?

Contact Persons

- Direct Supervisors
- Human Resources Department
- Finance Department
- Quality Management Department (Quality)

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