

CODE OF CONDUCT

Our ethical principles

Rentschler Biopharma SE · Status: February 2024

DEAR EMPLOYEES,

As a leading contract development and manufacturing organization (CDMO), our vision is advancing medicine to save lives. Together. We achieve this through our mission of being a reliable partner and a passionate enabler in transforming innovative ideas into life-saving biopharmaceuticals. By connecting experts, experience, and expertise, we are mastering the complex to achieve the best solutions.

Our entire business model is based on trust: Our clients trust in our competence and patients trust in our products. To this end we use our four corporate values for reference: to be respectful, progressive, reliable, and responsible. These values are reflected in everything we do and guide our actions in all situations. They enable us to create value sustainably for our clients and their patients. Responsibility, compliance, and integrity are important components of these values and are thus cornerstones of our business activities. They do not only define our relationships with clients and business partners, stakeholders, and interest groups, but also reflect our respectful mutual interactions. They are decisive for our success and for maintaining our reputation as a leading contract development and manufacturing organization (CDMO).

Therefore, Rentschler Biopharma not only stands for respect, progress, reliability, and responsibility, but also for a strong culture of ethics, integrity, and sustainability.

Our Code of Conduct is based on international conventions such as the Universal Declaration of Human Rights of the United Nations, the guiding principles on Children's Rights and Business, the United Nations guiding principles on Business and Human Rights, the labor standards of the International Labor Organization, the Global Compact of the United Nations, and on national laws and regulations.

We thank you for your support!

Benedikt von Braunmühl

Chairman of the Executive Board, CEO

Christiane Bardroff

Member of the Executive Board, COO

Gunnar Voss von Dahlen

Member of the Executive Board, CFO

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SCOPE

The Code of Conduct applies to all employees of Rentschler Biopharma SE and its subsidiaries Rentschler Biopharma, Inc., U.S.A and ATMP Limited, U.K. (in this Code also jointly referred to as “Rentschler Biopharma”). All employees of Rentschler Biopharma are obliged to comply with this Code of Conduct, with all internal policies and with applicable laws.

We expect everybody with whom we collaborate to respect and comply with comparable standards. This applies e.g., to agents, representatives, intermediaries or other third parties who act on behalf of or as authorized representatives of Rentschler Biopharma.

Applicable laws in individual countries may deviate from the regulations of this Code. In such cases, we will apply the stricter rules.



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FIGHT AGAINST BRIBERY, CORRUPTION, AND OTHER UNFAIR BUSINESS DEALINGS

We oppose any kind of fraud or bribery, corruption, extortion, money laundering or embezzlement. We do not allow granting or accepting of bribe money/kickbacks or other unlawful benefits or incentives in the framework of relationships with business partners or public agencies. We neither offer nor accept any illegal or improper gifts, invitations or other advantages which are intended as or may lead to an inadmissible influence.

To avoid such behavior at Rentschler Biopharma and to ensure compliance with the statutory provisions, we deliberately apply preventive measures such as compliance training or our whistleblower process.

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FAIR COMPETITION

Fair competition is the basis of entrepreneurial success. We always act in line with the principles of honest and fair competition and in line with the applicable provisions of competition and antitrust law. We avoid any kind of action that may create the impression of behavior that breaches antitrust or competition law.



INTEGRITY IN BUSINESS TRANSACTIONS AND CONFLICTS OF INTEREST

All employees have the obligation to take business decisions in the best interest of our company, in an objective way and free from any personal interests.

Conflict of interest can arise where investments or private, social, financial, political or other activities of an employee may potentially negatively impact the exercise of such obligation. A conflict of interest may also arise, where personal benefits are created for an employee or members of an employee's family because of the position that an employee holds in the company or because of a business agreement with the company.

Employees are required to avoid any conflicts of interest, and they have to inform their manager or the Legal department of Rentschler about any actual or potential conflicts of interest as early as possible in advance, so that a solution can be found as far as possible, taking into account applicable laws and company policies.



CONFIDENTIAL INFORMATION AND DATA PROTECTION

We put great emphasis on protecting confidential information of companies, employees, and other individuals. Our employees are prohibited to use or disclose such confidential information in an unauthorized way. In addition, we observe the respective applicable laws on the protection of data privacy and data protection and accordingly ensure the protection, safety, and lawful use of personal data.

INSIDER TRADING

Insider trading occurs where securities of a company (e.g., of a stock exchange listed client) are traded on the basis of material, not publicly disclosed information about this company. Insider trading legislation does not only prohibit trading securities based on insider information, but also disclosure of such information to third parties.

Our employees are therefore not permitted to illegally use insider information about Rentschler Biopharma business partners (e.g., for investment decisions or recommendations) or to disclose them to third parties.

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ACCURATE ACCOUNTING AND REPORTING

Based on the standards relevant for our company and with a view on professional diligence we commit ourselves to transparent and accurate accounting in accordance with the applicable laws, supported by an adequate and effective internal control system.



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INFORMATION TECHNOLOGY AND COMMUNICATION SYSTEMS

Our digital systems and the different communication technologies are provided to our employees exclusively for business purposes and have to be used prudently. Copying software and/or data from Rentschler Biopharma's computerized systems for personal purposes is not admissible, and neither is it admissible to install privately used or unlicensed software on company-owned hardware.

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QUALITY AND PRODUCT SAFETY

Everything we do is geared towards the highest quality. Since the purpose of our business is the transformation of medical developments into highly effective biopharmaceuticals and to thus protect the health and lives of patients, the compliance with all quality standards and an efficient internal quality management system ("QMS") are essential for our continuing success.

Rentschler Biopharma adheres to product safety regulations, and we oblige our suppliers to identify the products duly and properly and to communicate the product handling requirements. In case of justified need, the necessary documents containing safety-relevant information about all hazardous substances will be provided to us and to the parties concerned.

These include product information, safety data sheets, declaration or registration confirmations, intended uses, and exposition scenarios. We transparently fulfill our obligations to provide information about health, safety, and environment-related aspects of our products with all relevant parties.

Safety information about hazardous substances – including pharmaceutical compounds and pharmaceutical intermediates – is available at any given time, for training our employees and to protect them against hazards.

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HEALTH AND SAFETY AT WORK

We place the highest priority on providing our employees with workplaces that are safe and do not have adverse effects on their health as well as on meeting the applicable statutory and regulatory requirements concerning occupational health and safety.



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PROCESS SAFETY, EMERGENCY PROTECTION AND EMERGENCY SERVICES

PROCESS SAFETY

Rentschler Biopharma has management processes in place that serve the purpose of identifying the risks of chemical or biological processes and/or to prevent the critical release/discharge of chemical or biological agents or to respond immediately to it.

EMERGENCY PRECAUTIONS AND RESPONSES

We have action programs in place in order to prevent or mitigate the unintended release/discharge of chemical or biological substances in connection with work flows or processes. The programs have to be adequate for the risks for the plant and the processes and have to be sufficient to prevent damage to or negative impacts on our employees, the environment, or the plant.

We identify and assess emergency situations at the workplace and minimize their effects by adequate fire protection, effective business continuity and emergency plans, as well as periodic exercises and response procedures.

WORKING CONDITIONS

EXCLUSION OF FORCED LABOR

Neither Rentschler Biopharma nor our suppliers shall use forced labor, slave labor, or similar labor. Any work shall be done voluntarily and without threat of punishment.

Furthermore, the work force shall not be treated in unacceptable ways such as psychological hardship, sexual harassment, or humiliation. When hiring or using security staff it must be ensured that during the assignment no individuals are subjected to inhumane or degrading treatment or are hurt, and that the freedom of association is not affected.

PROHIBITION OF CHILD LABOR

We are opposed to any kind of inadmissible child labor.

Our suppliers are required to adhere to the ILO Convention regarding the minimum age for child work. Correspondingly, the age shall not be lower than the age at which general compulsory education ends according to the local laws of the place of employment and in any event not under the age of 15 years. Individuals that are less than 18 years old shall not be entrusted with tasks that may harm their health, safety, or morals. Special safety precautions have to be observed.

FAIR PAY

The remuneration for regular working hours and overtime is in keeping with the national statutory minimum wages or the minimum standards common in the industry. Rentschler Biopharma's employees are granted all benefits prescribed by law. Payroll deduction as sanction is not admissible. We take care that our employees receive clear, detailed, and regular written information about the composition of their remuneration.

FAIR WORKING HOURS

The working hours at Rentschler Biopharma are in line with the applicable local laws of the respective countries or the industry standards as well as the regulations of the International Labour Organization (ILO). Overtime work shall only be permissible within the framework of statutory rules and company policies.

FREEDOM OF ASSOCIATION

We do respect the rights of the employees to set up unions or employee representation bodies, to join them, to conduct collective bargaining negotiations or to go on strike. In cases in which the freedom of association and/or the right to collective bargaining is restricted by law, alternative possibilities are to be granted to the employees regarding independent and free association for the purpose of collective bargaining negotiations. Employee representatives shall be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights lawfully and peacefully.



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DIVERSITY, INCLUSION, AND ANTI-DISCRIMINATION

The diversity in our company brings about unique ideas, standpoints and abilities that are decisive for our success. This is why we rely on a diverse workforce and do not tolerate any discrimination based on racism or certain attributes like national, cultural or ethnic origin, descendance, religion, ideology, age, disability, gender or sexual identities.



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HARASSMENT

Every employee at Rentschler Biopharma has the right to work in an environment that is free from harassment. Treating each other with respect is a must. Therefore, we neither tolerate behavior that is inappropriate, humiliating, intimidating or hostile nor behavior that has an adverse effect on the performance of the job.





ENVIRONMENTAL PROTECTION

Through attentive action, we intend to create value sustainably and make our contribution to achieving the seventeen goals for sustainable development (SDGs). In all our activities we protect our employees, facilities, and the environment against detrimental effects. Within the context of our business model, we use means of production, resources, and energy in a responsible way, and we foster our employees' individual sense of responsibility for environmental considerations. We choose partners who share these obligations as well as the goals for sustainable development of the United Nations.

Rentschler Biopharma works eco-friendly and efficiently, in order to minimize negative effects on the environment. Our employees are called upon to protect the natural resources, to avoid the use of hazardous materials to the extent possible, and to participate in activities for re-use and recycling.

The corresponding actions include:

ENVIRONMENTAL PERMITS AND REPORTS

All applicable environmental regulations are respected. All relevant environmental permits, licenses, and registrations are obtained, and their operating and reporting requirements are observed.

WASTE AND EMISSIONS

Rentschler Biopharma has set up systems that ensure the safe handling, transport, storage, disposal, re-use, and recycling and/or management of waste, air emissions, and wastewater discharge. Any kind of waste, wastewater or emissions that may have a negative impact on human health or the environment, have to be adequately monitored and treated before releasing them into the environment. This also includes dealing with the release of active pharmaceutical ingredients (APIs) into the environment.

CONTAMINATIONS AND RELEASES

Rentschler Biopharma has systems in place in order to prevent or mitigate unintended contaminations of and releases/discharges into the environment as well as detrimental effects on the local community.

RESOURCE UTILIZATION

Rentschler Biopharma continuously takes measures to improve efficiency and to reduce the utilization of resources.

SUSTAINABLE PROCUREMENT AND TRACEABILITY

We verify the origins of critical commodities with due diligence to ensure that they comply with the regulatory and environmental requirements.

FURTHER INFORMATION AND PROVISIONS

Further information and provisions regarding individual parts of this Code of Conduct are contained in the relevant applicable corporate policies and work agreements.

REPORTING OF INFRINGEMENTS, WHISTLE-BLOWER PROTECTION, AND CONTACT PARTNERS

At Rentschler Biopharma we live an open feedback culture. Every individual can and ought to openly address concerns or report improper behavior in line with our whistleblowing policy without having to fear disadvantages or retaliation measures. Such reports can also be submitted through our whistle-blower system. The link to such system can be found on our internet site www.rentschler-biopharma.com, and for our employees on our intranet site MyRentschler.

If you have questions about this Code of Conduct, please feel free to contact Rentschler Biopharma's Legal and Compliance Department anytime. You can also find the contact persons on MyRentschler, our intranet.



