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## PREAMBLE

Dear Colleagues,

**All Together for Health** – that is what we work for every day. We act self-responsibly and in flat hierarchies, we contribute with own ideas and put them into practice – that's what it is about at Klinge Pharma. We believe in personality, engagement and enthusiasm of each of us as well as in achieving our goals together.

In our day-to-day work, we are guided by our corporate values that characterize Klinge Pharma and that are equally important to all of us.

Our Klinge Compass defines the framework in which we are operating and deciding on how to behave in tricky situations or whom to ask for advice. The Compass is based on both legal requirements and international, generally accepted industry standards.

Health is our most important asset. Credibility and trust in ourselves and our actions are essential. Thus, we take responsibility for our own actions at any time, within our team and with regard to our customers as well as other partners and patients.

I encourage everyone to act responsibly, i.e. to do the right thing.

Sincerely,

*Ines*

Dr. Ines Bohn  
Managing Director



# CONTENT

<b>1. General rules</b>	<b>6</b>	<b>6. Financial integrity</b>	<b>16</b>
– Why is the compass so important?	6	<b>7. Dealing with media and company equipment</b>	<b>17</b>
– Respect, fairness, honesty and integrity	6	<b>8. Data privacy, confidentiality and intellectual property rights</b>	<b>18</b>
– No discrimination	7	– Data privacy	18
– Responsibility, leadership and guidance	7	– Confidentiality	19
– Personal responsibility	7	– Intellectual property rights	19
– Do the right thing	7	<b>9. Implementation and organisation</b>	<b>20</b>
<b>2. Product integrity and patients' well being</b>	<b>8</b>	<b>10. Complaints and notifications</b>	<b>21</b>
– Product integrity	9	<b>11. Contact person</b>	<b>22</b>
– Patients' well being	9		
<b>3. Dealing with business partners</b>	<b>10</b>		
– Fair competition	10		
– Prevention of corruption	11		
– Political contribution, donation and sponsoring	12		
– Engagement of third parties	12		
<b>4. Conflict of interest</b>	<b>13</b>		
– Corporate shareholdings and sideline activities	14		
– Business relationships with relatives and friends	14		
– Gifts and invitations from third parties	14		
<b>5. Environment, health and safety</b>	<b>15</b>		
– Environmental protection	15		
– Safety at workplace	15		





## GENERAL RULES

### WHY IS THE COMPASS SO IMPORTANT?

The guidelines described in this code of conduct serve to protect each of us individually as well as the company. We therefore all comply with the rules. They provide orientation and an „inner compass“ for us.

### RESPECT, FAIRNESS, HONESTY AND INTEGRITY

At Klinge Pharma, we treat all colleagues with respect, fairness and openness. Our interaction is characterized by friendly, faithful and factual correct behavior with colleagues and business partners.

### NO DISCRIMINATION

We acknowledge human rights and do not tolerate any kind of discrimination, harassment or improper disadvantage based on race, nationality, ancestry, gender, religion, ideology, political opinion, age, disability or sexual orientation.

### RESPONSIBILITY, LEADERSHIP AND GUIDANCE

Every manager holds organizational and supervisory duties and bears responsibility for colleagues entrusted. Our managers serve as role models and contribute to our business culture of integrity with legally and ethically proper business conduct.

### PERSONAL RESPONSIBILITY

The responsibility of our managers does not release any of us from our own responsibility. It is the task of all of us to act with integrity in accordance with the principles of the Klinge Compass. Even the appearance of a violation of law can damage the reputation of our company.

We all are aware of the corporate principles and work in accordance with laws and standards that govern our decisions and actions in our areas of responsibility at work.

We do not tolerate violations. Violations may lead to labor and other legal consequences.

### DO THE RIGHT THING

Our decisions are responsibly taken and legally and ethically correct. At the same time, it is not always obvious what is right. It is important for us to discuss uncertain matters with appropriate experts, our supervisor or the management.



## PRODUCT INTEGRITY AND PATIENTS' WELL BEING

### PRODUCT INTEGRITY

We apply highest standards on our products and services.

As a healthcare company, we are subject to particularly high regulatory requirements and quality standards. Compliance with those requirements and standards is our top priority.

### PATIENTS' WELL BEING

Our goal is to ensure trust and comfort of patients and customers and to improve the lives and health of patients and consumers with our products and services.

We identify and assess potential product related risks at an early stage and communicate these clearly and transparently. We ensure that our products are used correctly by providing appropriate instructions and cautionary notes.



## DEALING WITH BUSINESS PARTNERS

### FAIR COMPETITION

Fair competition is a prerequisite for free markets and associated social benefits. Accordingly, we support fair competition and adhere to the principles of fair and open competition. We refrain from agreements of any kind with competitors that have the purpose or effect of restricting competition, in particular agreements on prices, market sharing or non-competition.

We also observe the principles of fair competition in our dealings with customers and suppliers and do not, for example, impose any conditions on sales prices.

Nor do we acquire relevant information in an inappropriate manner (e.g. theft, co-bugging/bugging) or knowingly disseminate false information about a competitor.

### PREVENTION OF CORRUPTION: OFFER AND ACCEPT BENEFITS

We conclude orders in a fair way based on high quality and good prices for our products and services.

We do not grant business partners and customers or their relatives any inappropriate benefits, such as gifts, meals, invitation or other advantages. The same applies to the acceptance of such inappropriate benefits by our colleagues. We do not offer or accept any cash money.

We apply particular diligence when granting benefits to public officials and dependent employees and ensure transparency by involving principals and employers.

When dealing with healthcare we adhere to the four basic principles acknowledged in pharma industry:

- **Principle of separation:** benefits must not be related to any prescription or procurement decisions
- **Principle of transparency:** every benefit must be traceable
- **Principle of documentation:** all services and remunerations must be properly recorded in writing
- **Principle of equivalence:** service and consideration must be in an appropriate ratio

### POLITICAL CONTRIBUTION, DONATION AND SPONSORING

We do not make any political contribution.

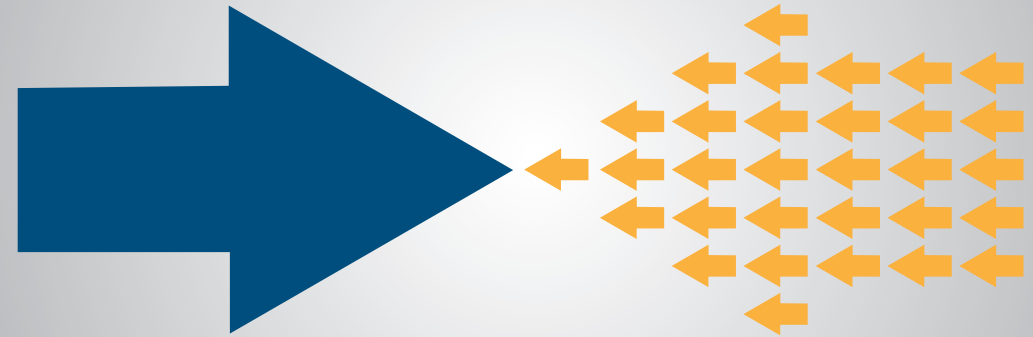
As a responsible member of society, we grant donations in cash or in kind to support education and science, art and culture, and social and humanitarian purposes to reputable institutions.

We sponsor third party events within appropriate means and according to industry standards.

### ENGAGEMENT OF THIRD PARTIES

We ensure to cooperate with business partners who share our values and comply with relevant legal requirements.

We do not instrumentalize third parties (e.g. representatives, consultants, agencies, etc.) in order to indirectly circumvent laws or regulations, e.g. to offer or grant or accept a benefit that we cannot give or accept ourselves. Before entering into agreements with third parties, we conduct appropriate due diligence and scope third parties for potential unlawful actions in the past.



## CONFLICTS OF INTEREST

We always act in the best interests of Klinge Pharma and avoid conflicts of interest. We are mindful about separating personal interests from company interests. The opportunity of personal gain must not improperly influence our decision making.



### CORPORATE SHAREHOLDINGS AND SIDELINE ACTIVITIES

Our colleagues shall not manage or have an interest in a company or work for a company that competes with Klinge Pharma. This also applies to secondary employments that could represent a competitive situation for Klinge Pharma.

### BUSINESS RELATIONSHIP WITH RELATIVES OR FRIENDS

We do not allow ourselves to be unduly influenced by personal relationships. When engaging third parties, we adhere to objective criteria such as price, quality, reliability.

### GIFTS AND INVITATIONS FROM THIRD PARTIES

We do not take advantage of our position at Klinge Pharma to receive gifts, invitations or other benefits for ourselves or related persons.

We discuss any relevant transactions with the relevant supervisor and take any necessary precautions in order to avoid even appearance of conflicts of interest.



## ENVIRONMENT, HEALTH AND SAFETY

### ENVIRONMENTAL PROTECTION

We consider ourselves as a responsible and environmentally conscious member of society. Our activities must not cause damage to the environment. We promote the use of environmentally compatible materials. We use natural resources responsibly and in the spirit of sustainability. We comply with regulations on the production, use, storage and disposal of hazardous materials.

### SAFETY AT WORKPLACE

Health and safety of our colleagues at their workplace is a high priority. We provide a safe and healthy work environment to maintain the health of our colleagues and to prevent accidents or work-related illnesses.





## DEALING WITH MEDIA AND COMPANY EQUIPMENT

We use facilities and equipment provided by Klinge Pharma, such as telephones, copiers, computers, software, internet, e-mail, for company purposes only.

We use social media, such as Facebook, Instagram, YouTube or LinkedIn, appropriately and in line with our corporate values, industry standards as well as pharmacovigilance requirements.



## FINANCIAL INTEGRITY

We maintain books and records in a proper manner. All reports that we prepare, publish or make available to appropriate authorities, companies and creditors comply with applicable accounting standards



**SGDPR**

## DATA PRIVACY, CONFIDENTIALITY AND INTELLECTUAL PROPERTY RIGHTS

### DATA PRIVACY

We are mindful about handling of personal data of colleagues and business partners and comply with the laws on their protection and security.

We collect, process and use personal data, such as addresses, dates of birth, account data, health-related information, to the extent and for as long as this is necessary for clearly defined and

legitimate purposes. Where necessary, we obtain the express consent of the persons concerned.

As far as we involve third parties in data collection or data processing, we conclude written contracts to ensure that they meet the minimum technical standards required by law and handle personal data with necessary care.

### CONFIDENTIALITY

We protect confidential information and trade secrets. For internal or appropriately marked confidential information that is not deemed to be published, we apply appropriate discretion. Before we pass on sensitive information, we enter into a corresponding confidentiality agreement with third party. Any disclosure to the public will only be made by appropriately authorized colleagues.

### INTELLECTUAL PROPERTY RIGHTS

We respect valid intellectual property rights of third parties, i.e. patents, tradenames or copyrights.



## COMPLAINTS AND NOTIFICATIONS

We encourage our colleagues to openly ask questions and raise concerns that will help us maintain and further strengthen our compliance culture.

Circumstances that indicate a violation of law, internal policies or the Klinge Compass may be raised verbally or in writing with

- the supervisor
- a member of management
- the Human Resources Department
- the Compliance Officer or
- at [compliance@klinge-pharma.com](mailto:compliance@klinge-pharma.com).

It is possible to make a confidential and anonymous complaint. If necessary, internal investigations will be initiated and appropriate measures taken.

We do not accept any retaliation against colleagues who raise questions and concerns in good faith. We support colleagues who make appropriate referrals and encourage them to cooperate fully with investigations.



## IMPLEMENTATION AND ORGANISATION

We familiarize ourselves with the laws and regulations related to our respective positions at Klinge Pharma and we behave in accordance with these rules and the Klinge Compass. Violations may result in employment or other legal action.

Even though a Compliance Officer is available to us for consultation, this does not relieve us of our own responsibility to take decisions with integrity.





## CONTACT PERSON

Colleagues who require assistance in applying or interpreting the Klinge Compass or specific legal or regulatory requirements are encouraged to speak with their respective supervisor, a management representative or the Compliance Officer at any time.

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