

# Code of Conduct

ACTING WITH INTEGRITY

V2.0



Within this Code of Conduct, the term “OSTHUS” refers to OSTHUS GmbH, its subsidiaries and affiliated companies. The conduct and compliance standards in this code apply to all employees and officers of OSTHUS. The term “PharmaLex” refers to PharmaLex GmbH, the parent company of OSTHUS GmbH.

## MESSAGE FROM OUR CEO

Dear Colleagues,

Our profession, success and value creation depend on our clients' trust. Therefore, Our Code of Conduct represents a minimum standard for accountable and socially responsible work. As each of us adheres to the following principles, we can avoid potential risks and violations of the law and contribute to continuous growth and success.

Our common mission is to connect data, people, and organizations to accelerate innovation for the benefit of mankind. We work together with our customers in international and interdisciplinary teams to solve the central technical challenges of our time.

Our compass is geared towards sustainable benefits for our customers and gives us direction and strength. Continuous learning, taking on responsibility, cultivating trust, and achieving results are our core values.

- **Learning:** Lifelong learning is a basis for our continuing success and social commitment in everyday life. We take into account new social and technical trends.
- **Responsibility:** We know and respect the laws and regulations that are relevant to us, and we are aware of our social responsibility. Managers practice our values and corporate culture in a credible manner and take consistent action against any conduct that is not in accordance with the law or the company's core values.
- **Trust:** Personal integrity and transparency are the basic prerequisites cultivating trust. The trust placed in our colleagues, our business partners and, above all that, the trust placed in us is the basis for a sustainable cooperation.
- **Results:** We focus on results and creating sustainable value. This enables us to deliver the best possible service to our customers and to act with integrity, without conflicts of interest.

The people who work in our company are the most important asset of our company. Investing in them is the foundation of strength and efficiency.

Responsible and ethical conduct for our employees, business partners, the environment, and society is an integral part of the corporate culture at OSTHUS. We value each individual, respecting their personal talents and abilities. It is our goal to enable every person to develop their strengths and magnify their role.

Working within the legally prescribed limits, such as labor laws, occupational safety, data protection, and data security, is just as important as working responsibly in dealing with the environment, ethics, and human rights. Breaches of these laws are incompatible with our values and corporate culture. The integrity of the company is an important building block in sustainable marketing and customer interaction. By living according to our compass and values, our customers' trust in our company, our expertise, and our results. In this way, we contribute to a sustainable development of the environment and society.

We reject activities that contradict our Code of Conduct in order to sustainably secure the company, guarantee our customers long-term support, and provide jobs for our employees and their families. A stable corporate policy also allows us to have a positive impact on our environment.

The continuous development and growth of our company largely depends on our commitment to social responsibility and our reputation as a trustworthy business partner. We thank you for your contribution to this through the integrity of your personal behavior.

Kind regards,

A handwritten signature in black ink, appearing to read "Andreas Mohr". The signature is fluid and cursive.

Andreas Mohr  
CEO

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# 1 INTRODUCTION

## 1.1 Why a Code of Conduct?

OSTHUS provides vendor-agnostic consulting and solutions for digital R&D. Leveraging our expertise in data & IT strategy, data governance, lab informatics, and advanced analytics, we transform data into digital assets that drive informed decision-making, generate more knowledge, reduce costs, and accelerate time-to-market. Our primary objective is to achieve outstanding results for our clients. Our clients trust that their needs have been met, their reputation has been protected and their business objectives are on track.

OSTHUS's Code of Conduct helps us maintain and build on —the trust we have established with our clients and one other—trust that is essential to the success of our business.

Our Code of Conduct, or Code, provides each of us with the rules, tools and resources for making sound decisions in complex business situations.

## 1.2 Everyone at OSTHUS

The Code of Conduct contains important rules and guidelines that apply equally to all employees of OSTHUS regardless of role or seniority. All of us must know and obey the laws and regulations that apply to the work we do and to the countries where we do business. By seeking out additional information, asking questions and conducting our business in accordance with the highest ethical standards, we can be sure we are doing the right things for our company and our clients.

## 2 OSTHUS COMPLIANCE PRINCIPLES

Our compliance principles are part of our DNA.

- We behave correctly.
- We respect one another.
- We create trust.
- We protect our company.
- We take responsibility as managers.

### 2.1 We behave correctly

We comply with applicable laws of the countries in which we operate, and we ensure the implementation of all company guidelines, processes and controls.

What laws must we obey?

We must be aware of and comply with laws and regulations that apply to our daily work. Those laws and regulations may vary from country to country. If we are uncertain or have questions, we contact our responsible manager, our local Human Resources contact or the chief compliance officer of PharmaLex.

What are the consequences of violations for our company and for us as employees?

Violations of laws or failures to comply with the Code of Conduct can have serious consequences for our company and us. The consequences can be in various forms for

Each of us:

- Disciplinary action
- Fines and damages
- Imprisonment.

Our company:

- Damage to OSTHUS's reputation, brand and market value
- Significant fines and damages
- Disgorgement of profit
- Exclusion from public and private contracts.

We ask ourselves the following questions when making decisions for OSTHUS.

- Is it right for OSTHUS? Is it in line with OSTHUS's values?
- Is it legal?
- Could it affect our brand if our decision becomes the subject of media coverage?
- What would the people we care about think of our decision?
- Are we prepared to take responsibility for our decision?

## 2.2 We respect one another

We respect the personal dignity, privacy, and rights of each individual. We believe diversity enriches our workplace. We work together without regard to national origin, culture, religion, age, disability, skin color, gender, sexual identity or orientation, or worldview. We do not tolerate discrimination, sexual or any other form of harassment, or inappropriate behavior toward individuals or groups.

We apply these principles of respect to one other and to third-parties with whom we interact, including our suppliers, clients and business partners.

## 2.3 We create trust

We are open and honest. We take our responsibility seriously, we are reliable and we make only promises we can keep.

We are sincere. We help clarify and eliminate potential deficiencies, problems and misunderstandings. We do everything to keep the trust placed in us by our clients and the users of our services.





What do we do when we make a mistake?

We all make mistakes at work. OSTHUS fosters a culture in which we learn from our mistakes. We deal openly with them so as to prevent them from happening again. And although most mistakes are minor, others could have serious consequences and should be reported.

What do we do if we observe a violation of the Code of Conduct?

We do not look away when we recognize possible violations of the Code of Conduct, even if they do not involve us personally. The company has numerous outlets to report possible violations of the Code of Conduct (see Reporting Procedures). In many cases, timely reporting is important in order to avoid or minimize negative consequences for the company.

## 2.4 We protect our company

We protect and promote OSTHUS's reputation and values, which are essential for our business success and which ensure the sustainable future of our company. If we act illegally or inappropriately, we can cause considerable damage to the company.

## 2.5 We take responsibility as managers

In general, managers are expected to demonstrate personal commitment to the Code by promoting compliance with the Code, policies and guidelines.

Managers at all levels of the organization should:

- Lead by example and ensure all employees are aware of and abide by the Code, other OSTHUS policies and procedures, and applicable laws and regulations.
- Create an open-door environment in which employees feel comfortable asking questions or raising concerns.
- Promptly escalate any known or potential violations of our Code or policies.
- Ensure that all employees are treated fairly.
- Take individual employees' needs and concerns into consideration.

### 3 TEAM AND WORKPLACE AT OSTHUS

We look after one another.

#### 3.1 Diversity and inclusion / non-discrimination

We believe that diversity and inclusion contribute to our excellence. We strive to recruit people from diverse backgrounds who have exceptional talent and ability.

We do not tolerate any discrimination based on race, color, religion, national origin, sexual identity, gender, gender identity, pregnancy, marital status, age, disability or socioeconomic status.



#### 3.2 Anti-harassment / workplace violence

*Harassment* refers to conduct that has the purpose or effect of creating an intimidating, hostile or offensive work environment for any person or group of people. At OSTHUS, harassment of any kind—whether sexual or non-sexual—is not acceptable and will not be tolerated.

A safe work environment is free from all forms of violence—either actual or threatened—and acts of intimidation or abuse. If you witness an act of harassment or violence, you have a responsibility to report it immediately to your manager or Human Resources.

#### 3.3 Free choice of employment

No one should be employed or forced to work against their will. All forms of forced labor are prohibited.

### 3.4 Prohibition of child labor

Child labor is strictly prohibited.

### 3.5 Working hours

OSTHUS adheres to all applicable, country-specific working-hours regulations globally. For details, please refer to the respective company policies.

### 3.6 Freedom of association and collective bargaining

OSTHUS recognizes workers' legal right to form or join existing trade unions and to engage in collective bargaining. Members of employee organizations or trade unions are neither disadvantaged nor preferred. OSTHUS constructively cooperates with employees, employee representatives and trade unions.

### 3.7 Health, occupational safety and security

OSTHUS is active in the field of occupational safety and health; we pay special attention to the health of our employees and offer preventive measures tailored to the sedentary work. In our occupational safety documentation, all relevant information that we commit ourselves to in this context can be looked up.

Every employee who has a contagious illness, such as for instance flu, is advised not to come into the office to avoid infection of other colleagues.

OSTHUS is committed to providing its employees a safe work environment and to ensuring employees are treated with consideration, dignity and respect. We share a collective responsibility to create and maintain a safe environment for our clients, visitors and coworkers.

An emergency can occur at any time, and OSTHUS's goal is to respond quickly and effectively to such to support our team and their families. Each OSTHUS office has dedicated team members who are trained to prevent, respond to and manage a range of situations. You, too, have a role in knowing your local office practices and emergency procedures.

If you are working in an OSTHUS office different from your own or at a client site, it is best practice to ask about local safety and security procedures (e.g., locations of emergency exits, evacuation meeting points).

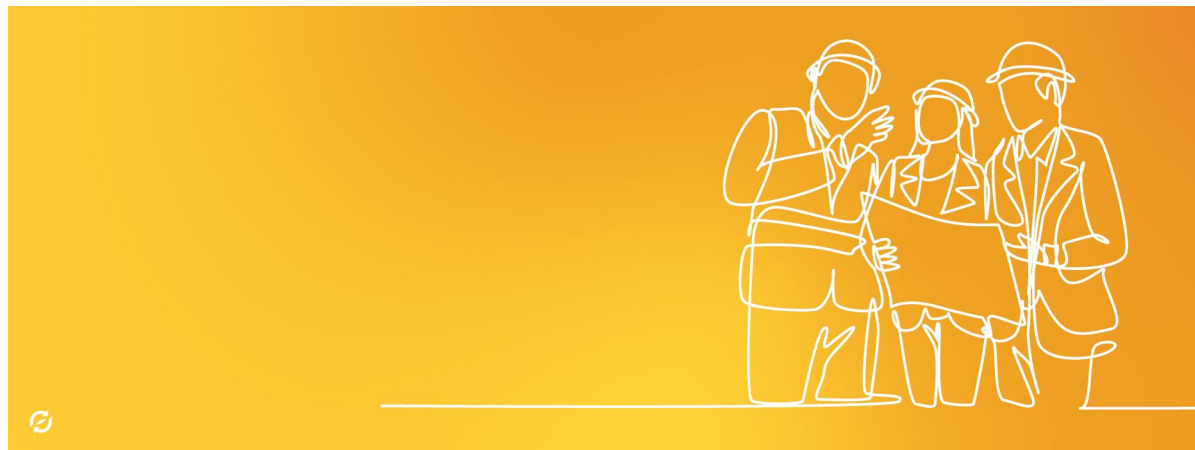
### 3.8 Personal security and travel

OSTHUS is active worldwide, including in areas and situations in which the security situation might be critical. If we travel to other countries, it is best practice to identify and analyze global security risks. In case of concern, we talk to our manager.

OSTHUS team members have responsibilities when traveling on business for OSTHUS. All OSTHUS business travel must be booked via OSTHUS Office Administration. All employees should also be mindful of safety guidance and warnings and be situationally aware—particularly when traveling or when in new surroundings, which is sound daily practice generally.

#### Things to remember

- We observe the safety regulations at our workplace.
- We avoid risky behavior.
- When we recognize dangerous situations, we take appropriate action.
- We educate ourselves in advance about security risks in the countries to which we will be traveling, and we comply with prescribed security procedures and requirements.



## 4 FAIR BUSINESS CONDUCT

We act fairly and reliably and reject all forms of corruption and bribery.

### 4.1 Anti-bribery and anti-corruption

OSTHUS believes in winning business through the strength of our people, our experience, our expertise, our approach and our commitment to excellence and integrity.

We abide by all applicable laws, treaties and regulations that prohibit bribery and other kinds of corruption, including German anti-bribery laws, the US Foreign Corrupt Practices Act and equivalent laws in every country in which we do business. This means all of us are prohibited from any bribery involvement with any person or company, including any government official, government body, private person or company. Although it is sometimes not obvious, keep in mind that the term *government official* includes any government officer, government employee or anyone acting on behalf of a government-owned or -controlled company or a political party or candidate.

**A bribe is anything of value—monetary or otherwise—that is offered, given, solicited, condoned or accepted in order to influence an individual’s behavior in a way that is illegal, unethical, improper or corrupt.**

Bribery can include indirect methods such as:

- Circumvention of legally required public-bid procedures
- Unusual or improper invoicing processes
- Use of intermediaries to obtain or win business
- Other forms of so-called payment such as lavish gifts or entertainment
- Hiring of relatives of government employees
- Payment of incentives or provision of gifts for government employees

Corruption is the misuse of public or private power for personal or business gain. Our prohibition against engagement in bribery or other corrupt behavior must be respected in all of our business practices, including our approaches toward the offering of any benefits, gifts or entertainment to clients, acquaintances or other third-parties.

OSTHUS also forbids so-called facilitation payments, which are small payments made to individuals with a view to the expediting of routine government actions such as the granting of visas. We expect officers, employees, suppliers, clients and others with whom we conduct business to follow that principle as well.

Anti-corruption laws have global application, and the consequences of their violation are severe, including imprisonment, fines and reputational damage to OSTHUS and the individuals involved.

## 4.2 Gifts and entertainment

Where permitted by local law, reasonable hospitality expenditures and the giving and receiving of small gifts may be acceptable parts of maintaining a business relationship. However, all hospitality expenditures and gifts should be reasonable, should be for justifiable purposes and should be given in the ordinary course of business. Hospitality expenditures and gifts should never be used to obligate the recipient or be perceived as attempts to influence the recipient to provide OSTHUS with a business advantage.

Confirm with your local Finance staff the appropriate process for providing gifts and entertainment, and ask questions about any limits on value.

Seek guidance from OSTHUS Legal or from the chief compliance officer of PharmaLex if you have questions about the propriety of a payment, favor or gift to be offered or received. For more information, refer to the PharmaLex Anti-bribery Guideline.

## 4.3 Antitrust law and fair competition

Antitrust law protects free, undistorted and effective competition for the benefit of clients, companies and society as a whole.

Antitrust violations can have serious consequences for our company and the employees involved, such as high fines, exclusion from public tenders, claims for damages, damage to reputation and imprisonment.

Anti-competitive agreements include price agreements; market, client and territory allocations; and project agreements with competitors.

We do not talk to competitors about:

- Prices, price components or other conditions
- Market, client or territory allocations
- Business opportunities or incoming orders
- Capacities, production volumes or quotas
- Corporate strategies or future market behavior (e.g., sales strategies, current or future product developments, investments, or boycotts)
- Offers or tenders
- Conduct during tenders or the submission of bogus offers.

#### 4.4 Trade and export controls

OSTHUS must comply with all applicable national and multi-national sanctions, as well as data export regulations and similar regulations with regard to business with certain foreign countries, entities or individuals. Such sanctions include entering into agreements or helping a client do business with a sanctioned country. We must also comply with any other sanctions applicable where we do business. If in doubt about whether international sanctions or data export regulations apply in a given situation, you should obtain advice from OSTHUS Legal or from the chief compliance officer of PharmaLex.

## 5 PROTECTING OUR COMPANY

We create trust and protect what makes OSTHUS valuable.

### 5.1 Individual conflicts of interest

Each of us is expected to produce work for our clients and OSTHUS at the highest level, free from any conflicts of interest. We make decisions and act in a manner that is independent and objective, but a conflict of interest can arise when our personal interests interfere with our ability to perform our jobs effectively and without bias.

### 5.2 Vendor conflicts of interest

A potential conflict could also arise if you, your family member or a close friend has personal or financial ties to an actual or potential OSTHUS vendor, client, contractor or other business partner or counterparty. If you become involved in these sorts of interactions, you should not be involved in discussions or negotiations related to your family member or friend's potential business relationship with OSTHUS. Instead, notify your manager immediately, and remove yourself from any involvement.



Outside work arrangements must be approved by Human Resources, and OSTHUS reserves the right to disallow outside work arrangements. Similarly, OSTHUS employees may serve on external corporate boards of directors only with prior approval from their supervisors.

The following questions help us assess whether there is a conflict or the appearance of a conflict.

- Is the decision we make for OSTHUS influenced by personal interests?



- What impression would the situation leave on third-parties such as clients, business partners and investors?
- How would the public react to my business decision?

### 5.3 Four-eyes principle

To properly protect the company's interests and maintain the company's independence for the purposes of internal decision making, we observe the four-eyes principle. Every important decision and approval must therefore be made or given—and legally binding signatures provided by—two authorized OSTHUS employees. Details of the relevant regulations are set out in the QM manual (chapter Operation) and in the process descriptions of the respective main rooms.

#### Things to remember

- Each of us is responsible for making decisions that are in our clients' and OSTHUS's best interests.
- A situation that could potentially become a conflict should be treated with the same care as an actual conflict.
- Any time your personal interests conflict with OSTHUS's interests, get help to find the best solution.
- Important decisions are subject to the four-eyes principle.

### 5.4 Insider trading

As OSTHUS employees, we may have access to information that investors and the public do not have, such as information about our clients and other companies with which we or our clients do business. Buying or selling stocks based on that information or tipping others to do so violates both the law and our confidentiality obligations to our clients. For that reason, OSTHUS employees and their related parties are prohibited from trading or tipping others to trade on the basis of any material, non-public or inside information.

### 5.5 Money laundering

OSTHUS will not be involved or assist with any form of money laundering. Money laundering is the disguising of the origin of money or other assets from criminal activities and moving the money or assets into the legitimate economy.

OSTHUS strives to maintain business relationships only with reputable clients, partners and companies whose business activities comply with legal requirements and whose financial resources are of legitimate origin.

## 5.6 Financial integrity

As an international company, OSTHUS is committed to accurate and truthful reporting to investors, employees, clients, business partners, the public and all government agencies. We follow all applicable laws, regulations, standards and practices. We ensure our books and records are kept completely, accurately and truthfully. Our books are prepared on time and in accordance with applicable rules, regulations and standards. We provide correct and complete information for financial-reporting purposes.

## 5.7 Books and records

OSTHUS's reputation depends on the integrity of all of our actions and dealings. It is up to each of us to make sure every piece of data we create or maintain in OSTHUS's records—including time and expense documentation and other records—is honest, accurate and complete. We are also firmly committed to the prevention and detection of fraud. Fraud will never be tolerated.

## 5.8 Our expectations of our partners

OSTHUS recognizes that the quality of our vendor and other third-party relationships affects the quality of our client relationships. This means that we expect our vendors to follow high standards of ethical conduct, including avoiding discriminatory or harassing behavior. OSTHUS expects our vendors to follow the Supplier Code of Conduct provided by PharmaLex.

Business relationships with our clients, our suppliers and other business partners are fundamental to OSTHUS. We maintain business relationships only with reputable partners that comply with the law. We will always select vendors based on their merit and ability to serve OSTHUS's business needs.

The following principles apply to cooperation with our partners:

- We work closely with our suppliers and business partners.
- We partner with our suppliers and help them improve.
- We constantly analyze our current business relationships and react immediately to emerging risks.
- We work only with suppliers that are prepared to eliminate problems or implement risk reduction measures.
- We conduct appropriate due diligence reviews.
- We comply with export controls and anti-money-laundering laws.
- We assess project risks when deciding whether to bid on a project.

## 6 CONFIDENTIALITY, DATA PROTECTION AND USE OF IT

Our goal is to make our clients' businesses more successful.

### 6.1 Client service and confidentiality

Our business is to help make companies more successful. To accomplish that goal, we apply our accumulated knowledge and experience gained from serving a broad range of clients. We always maintain the highest standards of protection of confidential and competitively sensitive information.

Further, we are always careful not to discuss client work in public spaces, and we protect sensitive information in electronic forms. Clients' confidential information, including specific strategies and case-specific advice, should not be shared beyond the case team. We do not publicly identify a company as an OSTHUS client or disclose any information about our work for a client without that client's consent. We also have an obligation to respect all third-party rights protected by copyright, trade secret, patent or other intellectual property laws.

Ultimately, it is our responsibility to maintain the confidentiality and integrity of the information we receive and to be thoughtful as to how we use, view, communicate and share it.

Seeing to the confidentiality and integrity of confidential client information is the obligation of every OSTHUS employee and contractor. Confidential client information should not be transferred from your computer to unapproved portable media devices. To further protect information assets, you should ensure that all portable devices are encrypted and password protected.

Some clients require our adherence to information security standards different from those we customarily apply, and therefore, we must be sure to understand and fully adhere to those client standards.



For more information, refer to our OSTHUS IT Policy (in ORBIT Security Concept and Infrastructure Services), Document Control Policy, and OSTHUS ISMS-Leaflet.

## 6.2 IT policy and privacy

We each have a responsibility to use OSTHUS's network and computer systems ethically and legally. The electronic communication systems and any messages transmitted on them are OSTHUS property and are provided for business purposes. OSTHUS reserves the right to monitor the use of OSTHUS systems, except where prohibited by local law. We must all apply sound judgment when using OSTHUS devices and transmitting information. You should consider your laptop and any other OSTHUS-issued device as business tools.

For more information, refer to the OSTHUS IT Policy (in ORBIT Security Concept and Infrastructure Services) and Information Security Policy (in ORBIT ISMS Leaflet ISO 27001).

## 6.3 Data protection

We each furnish certain personal information to OSTHUS in the course of our employment—including sensitive personal information—and OSTHUS is committed to securing that information to protect our individual privacy and identity. Some examples of sensitive employee information are benefits and compensation information, contact information, government-issued ID numbers and medical information.

We do not obtain or use our coworkers' or OSTHUS job applicants' personal information without a business need. If your job brings you in contact with personal information of either OSTHUS employees or clients, including customers of our clients, take special care to protect it from loss or theft. Access to and use of such personal information is restricted to the extent necessary and in accordance with the law.

This is what we attend to:

- We collect and process personal data confidentially and only for legitimate, predetermined purposes and in a transparent manner.
- We process personal data—by means of appropriate technical and organizational measures—only if the data is protected against loss, modification and unauthorized use or disclosure.
- We will immediately inform our company's local data protection organization of possible data protection violations.

For more information, refer to our OSTHUS Guideline Data Protection.

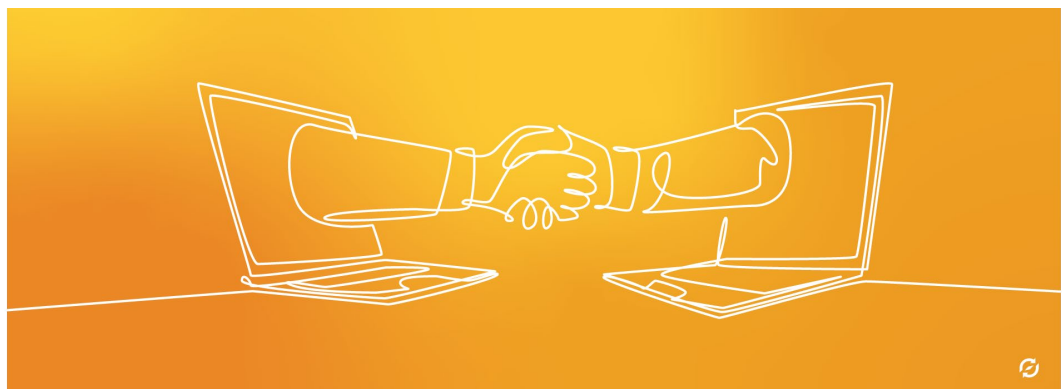
## 6.4 Records and information management

Our data management policies, practices and standards are designed to help each of us make the right judgments about what we delete, what we retain and why. Documents, including electronic files that are created or received during the course of client casework should be handled in accordance with our OSTHUS IT Policy (in ORBIT Security Concept and Infrastructure Services) and Standard Operating Procedures, which incorporates the following guidelines.

- Records must be managed efficiently and in a confidential manner that is consistent with guidelines on storage and access to information (document Control Policy) as well as any specific guidelines that may be agreed on with the client.
- With the exception of our deliverables, together with relevant supporting information and documents, which are kept confidentially in our permanent secure archive, records are retained only for such period as necessary to satisfy business requirements, applicable legal requirements and regulatory requirements (guideline Retention Periods), after which time they are disposed of. Records may not be disposed of (destroyed or removed) once anyone at OSTHUS receives a subpoena or otherwise has knowledge of pending litigation or regulatory action.
- Records are not the property of employees and upon an employee's departure from OSTHUS, records must be destroyed or turned over to a manager or other person designated by OSTHUS.

## 6.5 Client contracts

To ensure that we continue to achieve outstanding results for our clients, it is essential that our client engagements be contractually documented and mutually agreed upon at the outset of an engagement. All contracts that do not follow OSTHUS's standard terms must be reviewed by Legal and approved by a member of the senior management team, following OSTHUS's guidelines. We must involve the senior management team in the case of a proposed deviation from our standard fee, expense or invoicing structure.



## 6.6 Protection of intellectual property

Intellectual property includes, but is not limited to, images, texts and general intellectual property (IP) which is protected by copyright laws or trademark- or patent rights. We value and respect intellectual property of any kind, our own intellectual property and the intellectual property of customers, partners and others.

## 7 PRESERVING OUR REPUTATION

### 7.1 Media policy

We all have an obligation to protect the reputations of our coworkers, ourselves and our firm. Of course, the best way for us to uphold OSTHUS's stellar reputation is to continue helping our clients achieve outstanding results. Upholding our firm's good name through our words and our actions not only benefits OSTHUS but also demonstrates our commitment to the firm and enhances the benefits our clients receive from our services.

### 7.2 Social media

In an increasingly interconnected world, social media is a powerful tool, and OSTHUS fully supports the use of social media outlets. Our use of those tools, however, does not change our commitment to acting professionally and following our Code, our internal policies and the law. When using social media in a personal context, you are responsible for adhering to the following guidelines.

- Remember that the Internet is a public place. Once posted, messages and their intent can be easily altered, distorted and forwarded without your knowledge or permission.
- Make clear that your statements are your personal views and do not represent the views of OSTHUS.
- Be aware that anything you say about business issues on social media will be interpreted as OSTHUS's point of view. Therefore, you should ensure that such comments are consistent with OSTHUS's insights and experience; otherwise, refrain from commenting. A good way to ensure consistency is by sharing links to OSTHUS's publications.
- Do not disparage or criticize any company or executive who could be a client now or in the future.
- Respect your coworkers', OSTHUS's, our clients' information and the law by not posting confidential data, copyrighted materials, client names or others' personal information.
- Respect others by not posting discriminatory or harassing comments or images.
- Do not misrepresent yourself or OSTHUS.

To help ensure that the OSTHUS voice stays consistent, contact Marketing at [media@osthus.com](mailto:media@osthus.com)

## 8 SOCIAL, ECONOMIC AND ECOLOGICAL RESPONSIBILITY

We act socially, economically and ecologically responsible and achieve sustainable results.

### 8.1 Environment

OSTHUS has made a significant commitment to—and investment in—managing our own business in the most environmentally sustainable way possible.

As a good corporate citizen, OSTHUS complies with all applicable environmental laws, rules and regulations in effect in the locations where we do business. We monitor the environmental impact of our business activities. And through our entrepreneurial network, we champion and implement local sustainability initiatives that reduce our emissions.

All OSTHUS employees are encouraged to submit suggestions and ideas for reducing our environmental impact.



### 8.2 Social impact

At OSTHUS, our objective is to create outstanding results for our clients. OSTHUS aims to exert a transformative social impact by applying our talent in partnership with innovative and effective organizations—with a view to addressing some of the world’s most-pressing social issues—as well as by managing our own conduct as a firm. The pressing social issues we focus on from a global standpoint are entitled Accessibility to Medicine, Talent & Knowledge and Healthy & Green.



### 8.3 Our commitment to international agreements and recommendations

OSTHUS strongly supports the United Nations Global Compact.

The Global Compact's ten principles are binding on the entire company:

- **Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and
- **Principle 2:** make sure that they are not complicit in human rights abuses.
- **Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- **Principle 4:** the elimination of all forms of forced and compulsory labor;
- **Principle 5:** the effective abolition of child labor; and
- **Principle 6:** the elimination of discrimination in respect of employment and occupation.
- **Principle 7:** Businesses should support a precautionary approach to environmental challenges;
- **Principle 8:** undertake initiatives to promote greater environmental responsibility; and
- **Principle 9:** encourage the development and diffusion of environmentally friendly technologies.
- **Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

We are committed to promoting those ten principles within our sphere of influence. Respect for human rights, respect for fundamental employee rights, environmental protection and the ban on corruption are integral parts of our business.

In line with its commitment under the Global Compact, OSTHUS expects employees and the firm's suppliers and business partners worldwide to comply with the following guidelines.

- International Bill of Human Rights, consisting of:
  - Universal Declaration of Human Rights;
  - International Covenant on Civil and Political Rights; and
  - International Covenant on Economic, Social and Cultural Rights;
- European Convention on Human Rights;
- ILO (International Labour Organization) Tripartite Declaration of Principles on Multinational Enterprises and Social Policy and ILO Declaration on Fundamental Principles and Rights at Work—in particular, on the topics of elimination of child labor, abolition of forced labor, prohibition of discrimination, freedom of association and the right to collective bargaining—and fundamental freedoms;
- OECD Guidelines for Multinational Enterprises;
- Agenda 21 on sustainable development (final document of the fundamental UN Conference on Environment and Development, Rio de Janeiro);
- UN Convention against Corruption; and
- OECD Convention against Bribery of Foreign Public Officials.

## 8.4 Human rights

Compliance with the human rights laws and regulations is essential. OSTHUS believes human rights constitute a core element of responsible business conduct, and the firm operates in close alignment with the United Nations Global Compact.

## 9 REPORTING PROCEDURES

What to do about signs of possible misconduct?

### 9.1 Importance of reporting

We believe that asking questions and reporting potential problems benefits all of us. Consequently, we expect employees to report possible violations because we take all such reports seriously. Because our Code cannot possibly address each and every situation that might arise, it is up to each of us to use good judgment and common sense in our efforts to solve problems and resolve misunderstandings.

### 9.2 Whom to contact?

- Your manager or another manager you trust
- Human Resources
- Legal
- Quality Management
- Chief compliance officer of PharmaLex

### 9.3 How to report?

Information on possible violations of the Business Conduct Guidelines can be provided confidentially and anonymously as needed. OSTHUS will examine all reports and take appropriate measures. OSTHUS does not tolerate retaliation against complainants or whistle-blowers. Violations of that nontolerance will be punished as compliance violations.

OSTHUS encourages you to direct questions or concerns to your manager whenever you feel comfortable doing so. We realize, of course, that this may not be possible in every situation. In such cases, you can turn to one of the other resources listed earlier. When making a report, you should be honest and provide as much information as you can in order to facilitate follow-up.

When you report an issue, OSTHUS will investigate the report in a fair, consistent and expeditious manner. In so doing, we strive to maintain confidentiality to the extent possible. Depending on the circumstances, you may receive a follow-up communication upon conclusion of the investigation.

Please see also the OSTHUS Security Concept.

## QUESTIONS

If you have questions about any of the topics in this Code, you can approach any of the following.

- Your manager
- Human Resources
- Legal
- Quality Management
- Chief compliance officer of PharmaLex

The logo for OSTHUS features the word "OSTHUS" in a bold, white, sans-serif font. To the right of the text is a circular icon containing a stylized white lightning bolt or spark symbol. The logo is positioned in the lower right quadrant of a large, abstract graphic consisting of several overlapping circles in shades of yellow and orange.

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