



ALCEA. CORPORATE CODE OF ETHICS



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OUR MODEL OF ETHICAL BEHAVIOR IN BUSINESS

This Corporate Code of Ethics (the 'Code') lays out our stance on key compliance issues in line with our corporate values:

- GROWTH**
- RESPONSIBILITY**
- COURAGE**
- CREATIVITY**

The Code establishes ethical principles and standards of conduct that are expected of all employees, managers and senior executives of Alcea, as well as business partners and third-party intermediaries acting on behalf of Alcea, including distributors and their employees involved in marketing or sales of Alcea products.



Denis Glyadyaev
General Manager

A handwritten signature in black ink, consisting of several fluid, overlapping strokes.

The management is vested with the particular responsibility of creating a work environment where ethical behavior is encouraged and rewarded. At Alcea, every instruction must be implemented and every goal must be achieved in compliance with this Code.

In an effort to comply with legal requirements and stay true to our values, we have established the Compliance Department responsible for implementing a comprehensive corporate ethics program. Every employee, manager and senior executive is given necessary guidelines and operating instructions, as well as essential training required for every role and function.

We encourage employees, managers and senior executives, as well as external stakeholders, to be proactive and notify us of any violations they have witnessed. We do not retaliate against individuals who inform us about any violations in good faith.

We are certain that compliance with ethical norms is an integral part of our success, as well as of our company building and maintaining trust. Thank you for studying our compliance policies, as well as for actively participating in compliance training.



COMPLIANCE

NORMS. ETHICS. LAW.

THIS CODE APPLIES TO YOU

This Code applies to all senior executives, officers and employees of Alcea. Everyone is personally responsible for understanding this Code and complying with it. Agents, consultants, hired workers or other third parties must comply with the standards in this Code when addressing issues, representing or conducting business on behalf of Alcea.

Every manager must ensure that their subordinates understand these requirements and comply with these completely. You must inform your immediate supervisors or the Head of Compliance about the issues and problems you deal with while complying with these rules, as well as give suggestions on how to address the above.

We expect any third parties we work with to comply with all the standards set in this Corporate Code of Ethics and to have an effective management system to ensure compliance.



HOW WE DO BUSINESS

We comply with the Russian laws

We know and comply with all the relevant laws, rules and regulations of the Russian legislation

We stand against bribery, fraud and corruption

Bribery in any form is strictly prohibited and never tolerated.

We never provide or promise any person – be it a healthcare professional, a government employee or an individual – directly or indirectly, any bribes, kickbacks or other benefits (including cash, property, grants, donations, contributions to political parties, representation and/or transportation expenses, accommodation, conference fees, gifts and any items of value) in order to secure, retain or exercise influence to unduly obtain privileges. Similarly, we do not accept any benefits that may potentially jeopardize or unduly influence any of our decisions. We give or accept gifts, entertainment and invitations only when it is considered a good business practice, is completely transparent, and is without any corruption in mind. We have zero tolerance for fraud and corruption. We investigate alleged cases of fraudulent or corrupt use of funds and resources by employees or third-party business partners.

We adhere to high ethical standards, as well as all legal requirements when interacting with government officials, including civil servants or employees of the Government or any of its departments, institutions or enterprises.

For more information, please see the Alcea Anti-Bribery and Anti-Corruption Policy

We adhere to best practices

We comply with all the existing laws and regulations related to our activities, such as research and development, production, distribution, storage, marketing, market access, educational and promotional activities, as well as the provision of security information. Ensuring excellent product quality, safety and compliance with regulatory requirements is the main goal of Alcea.

We monitor and implement good practice standards set for the pharmaceutical industry (GxP), including best laboratory, clinical and pharmacovigilance practices, and best manufacturing, storage, distribution, documentation and promotion practices.

Please see the relevant Alcea Policies for more information.

We compete fairly

We act in compliance with all the relevant competition laws. In particular, we refrain from any discussions or agreements with competitors or other parties that restrict competition, including the exchange of confidential information (for example, production or retail prices, distribution of customers, markets, capacities) or collusion in bidding.

We refrain from unfair, deceptive or dishonest business practices.

We do not impose any illegal or abusive anti-competitive requirements on any of our distributors, licensees or other business partners. We compete based on the high quality of our products and the value of our employees.

We promote and sell our products in accordance with all the relevant rules and regulations, and high ethical standards. This commitment also covers all and any other activities related to the sale of our products.

For more information, please see the Alcea Policy on Competition Policy



We ensure the completeness and accuracy of our accounting books, records and public information

We accurately record all the information required by law. This includes expenses, income, research and/or clinical trial results, production and quality data, and any other information required by law. All financial transactions and payments must be authorized as the current charter on delegation of authority requires, and subsequently properly recorded. We comply with our tax commitments and all other public reporting requirements.

We comply with all the laws pertaining to insider trading, anti-money laundering and international trade.

We do not buy or sell shares of companies listed on the stock exchange contrary to commitments or other trust relationships, as well as on the basis of material non-public information about the company. We also do not share any such information with any other individuals or corporations, regardless of whether any such other individual or corporation will actually buy or sell shares after receiving any such information.

We comply with all the relevant anti-money laundering laws. We strive to do business with reputable partners using funds from legitimate sources. We take measures if there are any signs of a partner's involvement in criminal activities, terrorist financing or use of illegal funds.

We comply with all trade sanctions and export control laws existing in the areas and territories where we do business. We make the same demands of our business partners.

We work with ethical business partners

We build business relationships with third parties (such as suppliers, consultants, clients, etc.) to help Alcea manage its operations effectively and efficiently.

We strive to work with third parties that adhere to ethical business practices, including the practice of countering bribery and corruption, of corporate social responsibility, good labor, health, safety, environmental protection and management systems.

We select our business partners using fair and transparent due diligence procedures and procurement processes. Alcea also supports and complies with the recommendations of the competent Russian authorities regarding responsible sourcing of raw materials, including any requirements regarding 'conflict minerals.'

For more information, please see [Global Third Party and Third Party Intermediary Due Diligence Manual](#).



HOW WE TREAT OTHERS AND THE ENVIRONMENT

We protect the environment, as well as the health and safety of our teammates and others

We strive to comply with relevant laws and regulations regarding the environment, and occupational health and safety by:

- complying with all the relevant occupational health and safety, and environmental safety policies and procedures;
- using personal protective equipment if necessary; barring any persons under the influence of (illegal) narcotic substances or alcohol from working;
- unconditionally assessing potential environmental impact of our projects;
- reducing the use of resources wherever possible, immediately notifying of any incidents or accidents and supporting any investigations into those.

We treat our teammates and others fairly

We believe in exquisitely talented people with diverse backgrounds and inclusive thinking. At Alcea, we treat each other with respect and zero tolerance of any form of bullying or harassment. We do not tolerate any kind of discrimination, regardless of whether it is related to gender, nationality, race, skin color, religion, creed, age, ethnic origin, civil status, pregnancy, disability, genetic information, trade union membership, political affiliation or violation of any other protected status.

We do not compromise on the requirements set out in the Russian laws and regulations, or international human rights regulations. We do not use child or forced labor or other forms of involuntary labor. We refuse to work with suppliers who are caught using any such forms of labor.

We respect property rights of third parties. We do not tolerate misappropriation or violation of intellectual property rights or confidential information of third parties. We give our employees a fair and competitive salary based on the results of their work and in compliance with the Russian labor laws, including minimum wages, working hours and benefits.

We respect the freedom of opinion, speech and association

We can freely express our personal political views and engage in political activities outside of business hours and using our personal (non-corporate) communication channels (such as email) without any fear of retaliation or discrimination in the workplace. However, we do not use the company's name or information to promote our personal political interests. We are free to join trade unions and political parties of our choice, as well as to participate in or be involved in collective bargaining. We are free to express our opinions and have the right to the freedom of expression and speech, provided that the above does not interfere with our ability to fulfill our obligations under an employment contract and is not in conflict with this Code.

For more information, please see the Alcea Social Media Guideline.





HOW WE PROTECT OUR ASSETS

We protect the Company's property, including confidential information and intellectual property.

We take care of the Company's property, both tangible and intangible, and return it after the termination of our relationship with Alcea. We protect the confidential information of Alcea. We share confidential information only if we have the permission to do so, appropriate means of protection (for example, a confidentiality agreement) and solely on a need-to-know basis. We comply with all the laws and regulations regarding data protection and processing. The Company's confidential information includes any type of information that Alcea chooses not to make public, including trade secrets, business plans, databases, intellectual property, information on mergers and acquisitions, ownership data, process details, personal data, financial information, management changes, technical specifications, quotations or other business information.

We protect our intellectual property ('IP'), including pilot projects, inventions and technologies that give us a strategic advantage. IP includes our copyright, know-how, patents, trademarks and trade secrets.

We do not make copies of reports or documents for personal use, and we do not archive these for any such purposes. We only save or delete records in compliance with our internal record storage policies. We do not dispose of any records that are subject to legal storage, even if they are stored beyond the specified storage period.

We comply with all and any data protection and privacy rules. We respect the data protection rights of our employees, patients, healthcare professionals and other data subjects. We process personal data only in compliance with the relevant data protection laws, and protect personal data in Alcea's premises and systems from accidental loss, destruction, unauthorized access, use, modification and disclosure.

We disclose or transfer personal data to third parties only if legitimate grounds have been established and appropriate measures have been taken to ensure proper protection of any such personal data in accordance with the governing law.

In case of improper data management, data leakage or any incidents with files, printed or electronic, or systems that contain personal data, we immediately notify the company's data protection officer.

For more information, please see the relevant Alcea Policies.

We avoid conflicts of interest

We do not pursue personal interests, for our own benefit or for the benefit of our family members, friends and partners, if these are in conflict with the best interests of Alcea. If there are risks that our personal interests or third-party activities may affect our business judgment or decision-making on behalf of Alcea, we notify of a conflict of interest and cooperate to ensure proper management of the above.

For more information, please see the Alcea Conflict of Interest Policy.

We use the means of communication correctly

We use any corporate IT resources (computers, mobile devices, e-mail, data carriers, authorized software, Internet access, etc.) for business purposes and in the best interests of Alcea. We exercise common sense regarding the advisability of using the corporate IT resources for personal purposes, and we never expose Alcea to security threats. We do not create, access or view discriminatory, offensive, pornographic or other prohibited or inappropriate content. We understand that all and any data created in the corporate systems are the property of Alcea.

We understand that Alcea may monitor and investigate the use of corporate IT resources in compliance with the relevant employment and data privacy laws. We immediately notify Alcea of any suspected hacking, theft, loss or vulnerability.

For more information, please see the relevant Alcea Policies.



We communicate with the outside world and use social media responsibly

We guarantee that all the company's publications are approved by duly authorized persons. This includes publishing any information or issuing any statements on behalf of Alcea. We forward all media inquiries to authorized persons, as they are official representatives of the company. When communicating with external stakeholders, we take care of protecting the reputation of Alcea. In all our interactions, we do not hide our connection with Alcea and are focused on compliance with all the corporate policies and procedures, including this Corporate Code of Ethics.

During public appearances, we make it clear whether we are speaking on our own behalf (for example, by including a stipulation that the views expressed are our own and are not necessarily shared by Alcea) or on behalf of Alcea. We guarantee that all public statements on behalf of Alcea are reviewed and approved by competent subject matter experts and line managers.

We do not post misleading, inaccurate, false, confidential or defamatory statements on social media, nor do we comment on Alcea products or competitors.

We notify Alcea if we are aware of persons (who are not hired workers of any Alcea corporations) using the Alcea trademark or the company name on any social media. This includes employees of sellers, suppliers, distributors and any other third parties acting on behalf of Alcea.

For more information, please see the Alcea Social Media Guideline.



HOW WE WORK TOGETHER

We encourage feedback and the culture of dialogue

We aspire to create an environment with open and honest communication built on trust and cooperation. We encourage our employees to contact managers at all levels if they have questions, suggestions or concerns.

If we have information or reasonable suspicion that there has been a violation of the Alcea policy or the law, we notify Alcea accordingly. We are **all** personally responsible for notifying Alcea of alleged violations. We never retaliate for speaking out in good faith, even if any such allegations later turn out to be unfounded. On the other hand, we never abuse our right to notify in an unfair fight with teammates by making unfounded or defamatory accusations.

To notify about an incident, ask questions or give recommendations, we can contact one of the following contact persons: our manager or supervisor; HR department; head of another department in our office; any employee of the Legal Department or Compliance.

We do not tolerate any violations of this Code. The alleged violations will be properly investigated. If the violation is confirmed, it may lead to disciplinary measures or lawsuits, up to the termination of the employment relationship or contract with Alcea.

For more information, please see the Alcea Policy on Whistleblowing Policy.

EFFECTIVE DATE

This Corporate Code of Ethics comes into effect on **20 November 2023**. It covers any and all processes and employees, managers and senior executives of Alcea. It supersedes any and all prior corporate codes of ethics across all the divisions of Alcea.



