Antibiotice

ANTIBIOTICE S.A.
CODE OF ETHICS

General Director's Message

Dear colleagues,

You have joined a company with a 70-year experience in the pharmaceutical market. A company seeking always to put its employees' intelligence in service to those who need its support. A company whose mission is to develop valuable and affordable medicines as a means of providing healthcare.

We are honest, compasionate and always concerned with modernizing our work and products. We strongly believe that a valuable medicine is not necessarily an expensive one, but a medicine people can afford and brings the company a reasonable profit. A profit that satisfies our shareholders and allows us to target performance, permanently investing in people, technology and carefully selected partners.

We strive to consistently meet the expectations of our consumers, customers, business partners, shareholders, the community and, equally importantly, our employees. For these reasons, we are committed to honest behavior towards all the stakeholders. Each of our employees represents Antibiotice S.A., having the duty to respect and help implement the Code of Ethics.

In everyhing you do, do not forget to ask yourself whether the decisions you are about to make comply with the laws of the state and the ethics upheld by the company. If the recommendations of this Code of Ethics do not seem to be sufficient, ask yourself the following questions :

- *What am I going to do is correct? Do I defend the truth and honesty?*
- *Would I feel comfortable if my actions were known to those I care about, or if I had to bear the consequences of those actions?*
- *Are my decisions in favour of my company's image?*

If the answer is "no" to any of these questions, then it is better to ask for your colleagues' opinion before acting. Choose every time the correct, legal path which brings you peace and safety and leads to an increased prestige of your company.

The principles and values outlined in this Code of Ethics aim to emphasize the core elements that form the basis of the company's policy on ethics and morality.

Assuming these values is essential for ensuring the prosperity of Antibiotice S.A. and therefore, all decisions on the human resources management in matters of salary, motivation, promotion or retention will be influenced by the compliance with the Code of Ethics.

General Director
Ioan Nani, Economist

Preliminaries

A. This Code of Ethics (hereinafter referred to as the "Code") sets out principles and rules intended to determine an honest professional conduct and create an organizational culture based on integrity standards in accordance with the law in force.

B. The fundamental ethical values assumed by Antibiotice S.A. (hereinafter referred to as "Company") are:

a. Integrity
b. Professionalism
c. Responsibility
d. Transparency
e. Impartiality and Non-Discrimination
f. Confidentiality

The provisions of the Code of Ethics are mandatory and will be applicable to all the company's structures, members of the Management Board, Executive Directors (hereinafter referred to as "administrators"), employees and company's collaborators (hereinafter referred to as "employees").
For the purposes of this regulation, a Director of the company is solely the person to whom management responsibilities have been delegated by the Board of Directors through a mandate contract. The Code will be brought directly to the attention of administrators and employees and will be published on the Company's website to be communicated to commercial partners, the business community and the interested public.

CHAPTER 1. Principles and rules

1.1 INTEGRITY PRINCIPLES AND RULES

Art.1 (1) The Company is defined as an ethical partner in business that cultivates respect, loyalty and fairness in the relationships with third parties and its own employees.

(2) The Company will responsibly select its business partners taking into account the compatibility of trade objectives as well as ethics and integrity in business.

Art.2 Recruitment, selection and promotion of employees shall be made in a transparent, fair and non-discriminatory manner, based on criteria clearly defined by the Company and brought to the attention of the concerned parties.

Art.3 (1) The company will help improve the health of the population, providing quality and affordable medicines.

(2) The company assumes the membership of the local community and aims to support the academic and sports performance, key factors in maintaining the health of the population.

Art.4 The Company's administrators and employees will perform their duties only in the company's interest, having an integrity behavior at all times in relation to the Company, business partners and authorities, observing the legislation in force, internal regulations as well as the norms of good social conduct.

Following adherence to the National Anti-corruption Strategy, the administrators and employees of Antibiotice S.A. are also obliged to respect the strategic objectives assumed through the Integrity Plan developed for the entire company.

Through this plan, measures were taken to increase the level of anti-corruption education of the company's personnel, increase integrity, reduce vulnerabilities and corruption risks in the business environment, as well as increase the level of information regarding the negative impact of the corruption phenomenon on economic activity.

Art.5 The administrators and employees will adopt the values of the Code of Ethics, treating the other employees with dignity and respect, regardless of race, nationality, ethnicity, age, sex or sexual orientation, religion or social class.

Art.6 The administrators and employees of the Company:

a. will not abuse the position they hold;

b. will not use the information obtained in the exercise of the position in activities that are not related to it;

c. will not use the Company's assets in their personal interest, nor will they appropriate them without its consent.

Art.7 (1) The administrators and employees of the Company will not be involved, directly or through intermediaries, in commercial relations with the Company nor in share transactions with its affiliated parties.

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1 According to the provisions of the Fiscal Code in force on the date of approval of this Regulation, a person is affiliated if his/her relationship with another person is defined by at least one of the following cases:
a) a natural person is affiliated with another natural person if they are spouses or relatives up to the third degree inclusive;
b) a natural person is affiliated with a legal person if the natural person owns, directly or indirectly, including the holdings of affiliated persons, at least 25% of the value/number of shares or voting rights of a legal person or if he/she controls effectively the legal person;
c) a legal person is affiliated with another legal person if at least it owns, directly or indirectly, including the holdings of affiliated persons, at least 25% of the value/number of participation titles or voting rights in the other legal person or if it controls effectively that legal person;
d) a legal person is affiliated with another legal person if a person owns, directly or indirectly, including the holdings of affiliated persons, at least 25% of the value/number of participation titles or voting rights in the other legal person or if it controls effectively that legal person.

Art.8 Persons convicted, by final court decisions, for fraudulent management or corruption and service offenses as defined in the Penal Code cannot be members of the Company's Management Board or Directors.

Art.9 The Company's administrators and employees will not require or accept, directly or by intermediates, any bribe or other undue benefits in order to perform or not to perform a task in connection with the Company and will denounce immediately any proposal made in this regard.

Art.10 The Company's administrators and employees, directly or by intermediates, will not promise, bribe or offer any other undue benefits to the civil servants, business partners or to any other persons or legal entities and they will denounce immediately any request made in this regard.

Art.11 The administrators and employees of the Company will strictly maintain the confidentiality of any information obtained in the performance of their duties. Members of the Management Board, Directors as well as the staff with managerial positions, according to the company's organizational chart, are obliged to maintain confidentiality for a minimum five (7) year period after ceasing the relation of work with the Company.

Art.12 With the exception of persons empowered by the Management Board or by the Directors, the Company's administrators and employees are not allowed to make public statements about the Company or its employees. The Company's administrators and employees shall refrain from any action that could prejudice the image of the Company or products/ brands in its portfolio.

1.2 PRINCIPLE OF PROFESSIONALISM

Art.13 The administrators and employees of the Company have the obligation to make every effort to effectively and efficiently fulfill their duties, being directly responsible for compliance with legality in the acts and actions they perform.

Art.14 The level of professionalism of the Management Board's members, Directors will be a high one, so as to be able, through their previously gained professional experiences, to have a good understanding of the markets in which the Company operates and to cope with the challenges and current issues the Company faces.

Art.15 The activity of the Company's administrators and employees will be guided by the principles of legality and efficiency, being oriented towards increasing the degree of satisfaction of shareholders and customers but also towards economic sustainability (the efficient use of human resources and company assets to allow it to operate in the long term).

Art.16 The administrators of the Company will comply with the Operating Regulations of the Management Board, having during the entire period of their mandates a professional and moral conduct appropriate to the position they hold, being aware that they represent the image vectors of the company.

Art.17 Throughout the period of performing their tasks, the Company's employees will observe the work discipline and internal regulations, will have a proper attire and a decent behavior in accordance with the position within the company and with the representation role in the relations with trading partners or authorities.

Art.18 Unless they are in conflict of interest, incompatibility or in medically justified cases, the Company's administrators and employees of the Company will not refuse to perform a service assignment from personal reasons, and the way in which they will carry out the assignments, also will not be influenced by personal reasons.

Art.19 The Company's administrators and employees will not exceed the limits of their competence and authority with which they were invested and will not perform activities for which they do not have the necessary professional competence or which are illegal. The Company's administrators and employees will demonstrate dedication to the profession, efficiency and effectiveness in the activities carried out, as well as respect for society and third parties.

1.3 PRINCIPLE OF RESPONSIBILITY

Art.20 The Management Board and the Directors assume the responsibility towards shareholders for managing the Company, aiming with the highest priority for it to achieve economic profitability and sustainable financial performance in the long term.

Art.21 The Management Board and the Directors assumes the responsibility for research, development and innovation as well as for the human capital development in order to ensure the Company's competitiveness and generate long-term added value.

Art.22 The Company's administrators and employees assume their decisions, their implementation being done through a fair delimitation of competences, in accordance with the good corporate guvernance practices.

Art.23 Environmental responsibility is another principle of the company's activity. Operation of equipment complying with the safety and environment protection standards, recycling waste and limiting the emissions of technological residues represent objectives assumed by the Company.

Art.24 The Company assumes social responsibility, demonstrating respect for human and social values both at the national level and across all international territories where it operates. The promotion of internal projects and programs for employee development and the cultivation of responsible behavior is also a responsibility assumed by the Company.

Art.25 The company assumes its responsibility for the health of population, supporting through the "Antibiotice Science and Soul" Foundation, the sport, people with special needs, medical professionals and various social cases, adopting a sponsorship policy in accordance with to this vision.

1.4 PRINCIPLE OF TRANSPARENCY

Art.26 The company adheres to the principles of decision-making transparency in accordance with corporate governance standards as well as to the principles of transparency regarding information of public interest.

Art.27 The company ensures a fair treatment of all shareholders, regardless of the number of shares as well as an equal access to information, thus enabling them to exercise their rights.

Art.28 The Company maintains an active policy of communication and consultation with all shareholders, ensuring their participation in general meetings and facilitating their involvement in the decision-making process.

Art.29 To contribute to the proper functioning of the capital market, the Company takes the necessary measures to ensure that "privileged information", accessible to administrators or employees before it becomes public, is not used for personal interest to obtain financial benefits or other personal advantages. Disclosure of this information to unauthorized persons constitutes a violation of this Code and of the applicable legislation.

Art.30 The company will periodically publish financial and corporate governance reports in the format and within the timeframes established by the applicable laws and the regulations of the Bucharest Stock Exchange.

Art.31 The administrators will communicate any information regarding the company's activity to the shareholders and the Public Tutelary Authority whenever requested or deemed necessary, respecting the legislation in force on transparency in communication and on the equal treatment of shareholders, as well as the communication procedures established by the Management Board's Operating Regulations.

Art.32 The Company will publish on its website at least the following information of public interest:

- GSM decisons, within 2 working days from the date of the meeting;
- Annual financial statements, within 2 working days from the approval date;
- Half-yearly accounting reports, within 45 days from the end of the semester;
- Composition of the Management Board, including: name and surname of each Management Board member, the CV of each Management Board member, date of termination of the mandate of each Management Board member, political affiliation of each Management Board member, status of each Management Board member, i.e. permanent or temporary, remuneration of each Management Board member, including any bonuses or benefits;
- Declarations of assets and interests of each Management Board member for the entire duration of the mandate;
- The annual report on the remunerations and other incentives granted to the administrators and directors, during the financial year;
- The Code of Ethics, within 2 working days from the date of adoption, respectively on May 31 of each year, in case of its revision;
- The procedure by which the Management Board members were selected, as well as the revocations from the respective positions in the last 3 years and the reasons for the revocations;
- The Letter of Expectations;
- The mandate contract;
- The budget for investments in each of the last 3 fiscal years;
- Total personnel expenses in the last 3 years (including salaries, increases, bonuses, training or professional education, settlements and other benefits);
- The company's debts to the state budget, to credit institutions and to commercial partners, with the indication for each category of what percentage is represented by arrears;
- The value of the operational subsidy received from the state budget;
- Services or goods produced by the enterprise in the public interest;
- The risk situations/risk analysis in the company's field of activity;
- The annual report;
- The company's integrity plan (developed in accordance with the OECD Good Practice Guide on Internal Control, Ethics and Compliance) and the whistleblower reporting mechanism for violations of the law;
- The external audit report.

The annual financial statements, semi-annual accounting reports, Management Board’s reports and the annual audit report are published on the company's website and retained for a period of at least three years, after their approval. The information will be published in a dedicated section on the company’s website.

1.5. PRINCIPLES OF FREEDOM OF EXPRESSION, IMPARTIALITY AND NON-DISCRIMINATION

Art.33 Antibiotice S.A. ensures equal opportunities and treatment regarding the personal development of administrators and employees by cultivating relationships based on responsibility, loyalty, mutual respect, respect for freedom of expression, collaboration and professional support. Discrimination through the use of practices that disadvantage individuals based on gender, ethnicity, age, or disability in the context of social and professional relations is prohibited.

This includes, but is not limited to: job announcements, organization of competitions, interviews, examinations, and selection of candidates for vacant positions; conclusion, suspension, modification and/or termination of the legal employment relationship; establishment or modification of the duties in the job description/work instructions; establishment of salary and rewards or benefits, other than those of a salary nature; professional information and counseling; evaluation of individual performance; professional promotion; application of disciplinary measures; the right to join the union and the facilities granted by it.

Art.34 Antibiotice S.A. ensures a climate free from any manifestation and form of exploitation, humiliation, contempt, threat or intimidation. The administrators and employees adhere to the values of tolerance towards differences between people, between opinions, beliefs and intellectual preferences. The debates within Antibiotice S.A. are conducted through rational arguments, and the use of offensive language, personal attacks, and insulting behavior are prohibited.

Art.35 In carrying out their duties, the Antibiotice's administrators and employees have the obligation to respect the dignity of the position held, correlating freedom of dialogue with the promotion of the interests of society. In carrying out their duties, the Antibiotice's administrators and employees must have a conciliatory attitude and avoid generating conflicts due to the exchange of contradictory opinions. Antibiotice S.A. encourages critical approaches, dialogue, intellectual partnership and cooperation, regardless of political opinions, religious beliefs or sexual orientations.

1.6. CONFIDENTIALITY PRINCIPLE

Art.36 The information to which the Antibiotice administrators and employees have access by virtue of their specific duties must be protected and treated responsibly, especially in the context where their disclosure can generate major negative effects at the company level, both from a legal and reputational point of view.

It is mandatory for the Antibiotice administrators and employees to protect personal data, confidential information and intellectual property of the company and they are prohibited from: disclosing confidential information of the company to other persons outside the company and using or accessing confidential information or intellectual property belonging to the company.

CHAPTER II.
Conflicts of interests and incompatibilities. Settlement rules

Art.37 The conflicts of interest represent the situations in which the administrator or employee of the company has a personal interest that influences or can influence the fulfillment of his/her duties with impartiality and objectivity. The personal interests of the administrator or the employee may include a benefit for himself/herself or his/her family, for his/her close relatives, friends, persons or organizations with which they have business relations. The personal interest can also refer to any financial or moral debts that the administrator or the employee has towards the persons listed above.

Art.371 Incompatibility refers to a situation in which the administrator or employee of the commercial company simultaneously holds two or more positions or roles whose combination is prohibited by law. The regulation of incompatibility situations aims to maintain impartiality in the exercise of professional duties, considering that the positions held in a state of incompatibility may influence each other, making it impossible to perform them objectively.

Art.38 The company's administrators and employees will refrain from any act that constitutes a conflict of interest or a situation of incompatibility and will immediately notify the Management Board or the hierarchical superior, where appropriate, about:

a. his/her own interest, the interest of his/her spouse, or the interest of a relative or in-law up to and including the fourth degree, in a decision that he/she is required to make personally or participate in, or in an action that he/she must take in the performance of his/her job duties;

b. the fact that he/she has business relations with a legal person or is in a friendship or business relations with a natural person in connection with whom he/she is required to make a decision personally,participate in making a decision, or perform an act in the performance of his/her duties;

c. the fact that he/she has received or is receiving benefits from a person in connection with whom he/she is required to make a personal decision, participate in making a decision, or perform an act in the exercise of his/her job duties;

d. any personal interests that may conflict with the exercise of mandate or professional duties; he/she will avoid the situations where such conflicts of interest may arise;

e. his/her role, that of his/her spouse or of a relative or in-law up to and including the fourth degree, as founder, shareholder, associate, member of the Management Board, member of the Executive Board, or director of a legal entity (commercial or non-commercial), if the Company is about to establish business relations or other types of relationships with that legal entity that produce financial effects.

f. the fact that he/she holds two or more positions, the combination of which is prohibited by law or by other applicable administrative acts.

Art.39 The administrators and employees who are aware of the existence of a conflict of interest or an incompatibility within the Company, will immediately notify in writing the Ethics and Integrity Council.

Art.40 The Management Board's President or the General Director, as the case may be, will not knowingly allow administrators or employees of the Company to perform their duties in a situation of conflict of interest or incompatibility. In such situations, the Ethics and Integrity Council will be notified, in order to identify a solution in accordance with the provisions of this Code and the applicable legislation.

Art.41 The solutions for managing the conflict of interests and incompatibilities will be established by the Decision of the Management Board for conflicts of interests of administrators, or by Decision of the General Director for conflicts of interests of employees. In both situations, the decision will be taken based on a written report of the Ethics and Integrity Council, issued following a detailed investigation of the conflict of interest or the incompatibility situation.

Art.42 (1) The main options for resolving conflicts of interest or cases of incompatibility:

a. Any person found to be in a conflict of interest must give up their personal interest;
b. Any person found to be in a situation of incompatibility must relinquish the concurrent holding of positions or roles;
c. Recusal, or voluntary withdrawal from the decision-making responsibility, or abstention from voting, with prior notification of all parties affected by the respective decision regarding the measures taken to safeguard the integrity of the decision-making process.
d. Prohibition of the involvement of the person in a conflict of interest in the decision-making process, without otherwise affecting their duties, in cases where the conflict is unlikely to reoccur.
e. The access of the person in conflict of interest to certain information must be restricted;
f. Redistribution of duties and responsibilities or the transfer of the person in a conflict of interest to a non-conflicting position, in cases where the conflict is likely to reoccur.

(2) Any other legal measures may be adopted to resolve conflicts of interest or incompatibility situations, depending on their specific nature, the damages caused to the company, the risks to which the Company was exposed due to failure to report the conflict, and any characteristic elements.

Art.43 Decisions taken or legal documents signed by persons in a conflict of interest may be revoked by a decision of the Management Board or the General Director, as the case may be.

CHAPTER III. Ethics and Integrity Board

Art.44 The Ethics and Integrity Board of Antibiotice S.A. has been founded by the Decision no. 34/1481P/06.02.2015 of the General Director, having the structure, powers and work procedures established by Chapter VIII of the "Code of Good Practices of Antibiotice S.A".

Art.45 The Ethics and Integrity Board will supervise compliance with the provisions of the Code of Ethics and any violations of these provisions will be considered an incident of ethics.

Art.46 The Ethics and Integrity Board will review all ethics-related incidents resulting from violations of this Code, whether brought to its attention through a complaint or identified *ex officio*, and will issue a written report on each case, in which it will propose to the Management Board or the General Director, as applicable, the measures it deems necessary.

CHAPTER IV. Penalties

Art.47 Violation of the provisions of the Code of Ethics by the administrators represents deviations from the management approach of the Company as established by the shareholders through the Letters of Expectations and assumed under the mandate contracts and may result in sanctions according to the mandate contracts and the Operating Regulations of the Management Board.

Art.48 Violation of the Code of Ethics by the Company's employees constitutes misconduct and may incur penalties in accordance with Law 53/23 on the Labour Code.

This Code of Ethics and its Annexes were adopted by the Board of Directors of Antibiotice S.A. at its meeting held on 11 June 2015 and were last revised at the meeting of the Board of Directors held on 15 May 2025.

Annex no. 1 to the Code of Ethics

GIFT DECLARATION PROCEDURE FOR COMPANY ADMINISTRATORS

1. Purpose of the procedure

The purpose of this procedure is to establish how the administrators of the commercial company Antibiotice S.A. will declare and present to the head of the commercial company, within a maximum of 30 days from receipt, the goods they received free of charge as part of protocol activities related to the exercise of their mandate, in accordance with the requirements of Law no. 251/2004 regarding certain measures related to goods received free of charge on the occasion of protocol actions in the exercise of job duties. This procedure does not apply to the Antibiotice employees.

2. Legislation

- Law no. 251/2004 on measures concerning goods received free of charge during official protocol activities carried out in the exercise of the mandate or position;
- Law no. 161/2003 Law no. 161/2003 on measures to ensure transparency in the exercise of public office, public positions, and within the business environment, as well as for the prevention and sanctioning of corruption, as subsequently amended and supplemented;
- Decision of the Government of Romania no. 1269/2021 regarding the approval of the National Anti-Corruption Strategy for the period 2021-2025.

3. Definitions

- the head of the commercial company = General Director of Antibiotice S.A.;
- gift = good received free of charge as part of protocol activities in the exercise of the specific duties of the administrator of the commercial company;
- the Antibiotice S.A. administrators who fall into one of the categories mentioned in art. 1, para. 1 of Law no. 251/2004 = persons who are members of the Management Board of the commercial company and who have the obligation to submit asset declarations.

4. Principles

The principles underlying the gift declaration procedure are:

- principle of transparency;
- principle of equal access to public information;
- principle of guaranteeing the protection of personal data;
- principle of guaranteeing the availability of public information, according to Law no. 161/2003 on measures to ensure transparency in the exercise of public dignitaries, public servants and the business environment, prevention and sanctioning of corruption, with subsequent amendments and additions.

5. Description of the procedure

The administrators of the company bring to the attention of the Ethics and Integrity Board, by means of a declaration (attached form), within 30 days of receipt, the goods they received free of charge as part of protocol activities in the exercise of specific duties. The Ethics and Integrity Board inventories and evaluates goods received free of charge as part of protocol activities taking into account the market prices for them.

The declaration is made in writing and is accompanied by the goods to be handed over, including the following information:

1. name and surname of the administrator;
2. the detailed description of the delivered good;
3. description of the circumstances in which the good was received;
4. date and signature.

A dedicated register will be used to record the declarations.

If the value of the goods inventoried by the Ethics and Integrity Board exceeds the equivalent of 200 euros in Romanian lei, the administrator who received the goods may request to keep them, subject to payment of the difference in value. If the value of the goods established by the Ethics and Integrity Board is below the equivalent of 200 euros in Romanian lei, they may be retained by the administrators.

If the administrator who received the goods has not requested to keep them, the goods shall remain the property of the commercial company, upon a proposal by the Ethics and Integrity Board. At the end of each year, the list containing the goods deposited according to Law no. 251/2004 and their destination is published on the website of the commercial company.

During the process of inventorying and evaluating gifts, medals, decorations, badges, orders, scarves, necklaces, and similar items, received by administrators in the exercise of their official duties, as well as office supplies with a value lower than the equivalent of 50 euros in Romanian lei are excluded.

6. Ethics and integrity board

Responsibilities of the Ethics and Integrity Board, regarding the gift declaration procedure:

- receives the administrators' declarations regarding the goods received free of charge as part of protocol activities, in the exercise of specific attributions;
- registers and keeps track of the quantity and value of goods received free of charge by administrators, as part of protocol activities;
- evaluates and inventories the goods received free of charge by administrators as part of protocol activities;
- returns to the administrators, the goods whose assessed value is below the equivalent of 200 euros in Romanian lei;
- approves the retention by administrators of goods with an assessed value exceeding the equivalent of 200 euros in Romanian lei, provided that they pay the difference in value.
- proposes keeping the assets in the company's patrimony if the administrators do not want to keep them;
- ensures the publication of the list of the deposited goods and their intended use;
- ensures the safekeeping and security of goods.

DECLARATION REGARDING GOODS RECEIVED FREE OF CHARGE DURING PROTOCOL ACTIVITIES IN THE EXERCISE OF ADMINISTRATOR'S MANDATE

The undersigned, administrator of Antibiotice S.A., in accordance with the provisions of Law no. 251/2004 on certain measures regarding goods received free of charge during protocol events in the exercise of the mandate or position, and being aware of the provisions of art. 292 of the Criminal Code concerning false statements, I hereby declare on my own responsibility that I have received the following goods free of charge in the context of protocol activities carried out during the exercise of my mandate: _____

Date: Signature:

Annex no. 2 to the Code of Ethics
COMMITMENT OF ANTIBIOTICE TO BUSINESS ETHICS

Antibiotice S.A. is committed to the highest ethical standards of business conduct. We operate globally and comply with the law wherever we do business. We focus on complying with all local and international anti-corruption laws, regulations, standards, policies and procedures that may apply to our business. We also ensure that we comply with applicable pharmaceutical laws and regulations governing the preclinical and clinical studies, production, distribution, marketing and promotion of our products.

This Code of Business Ethics serves as a guide for making the best decisions. Business ethics means acting with integrity and respect, in accordance with international standards of responsible business conduct. A key objective of business ethics is to prevent corruption, fraud and theft in all its forms, from extortion and bribery to other ways of exerting undue influence. We are accountable for our actions and are transparent about our business decisions and practices.

This Code of Business Ethics explains in more detail what business ethics means to Antibiotice S.A. and sets the standard for ethical business conduct. In some countries, local laws, regulations, industry codes may set specific requirements stricter than this Code of Conduct. Where this is the case, we follow the stricter rules. This Code applies to anyone who conducts business for or on behalf of Antibiotice S.A., including:

- executive team and the Management Board;
- all the employees;
- business partners that act in the name of Antibiotice S.A. or in its interest.

I. Business ethics in general

Antibiotice S.A. promotes and respects an open and honest culture of trust and integrity in business. We are honest in our interactions with customers, healthcare professionals and any other stakeholders and do not offer, promise, provide or accept benefits, gifts, goods, etc. to improperly influence a business decision or to obtain an improper advantage. We also do not allow third parties to pay bribes on our behalf.

Adhering to international laws and standards for responsible and ethical business conduct inspires trust in our organizational culture. We comply with all laws, regulations, policies, standards and procedures that apply to our business.

1. Bribery and any illegal advantages

Antibiotice S..A. competes fairly, responsibly, ethically and transparently in the business environment in which it operates.

We do not bribe or offer improper or illegal advantages. By bribes and improper advantages we mean both monetary benefits, such as cash payments or illegal discounts, and non-monetary items, such as gifts, products, hospitality and/or inappropriate meals, travel and accommodation, or other items or services that could be interpreted as a transfer of value in exchange for special attention. Legitimate business expenses for items such as meals, travel and lodging, etc. are permitted if explicitly permitted by local law, as well as company regulations and policy.

Antibiotice S..A. prohibits facilitation payments at the national or international level. A facilitation payment is any unofficial transfer of value to a public official to carry out routine government actions, for the direct or indirect benefit of the company.

2. Fraud

Antibiotice S.A. ensures the integrity of commercial transactions by maintaining related documents and records in an accurate and complete manner. Records such as invoices, employee expenses, and any transfer of value to a company, organization, or person outside Antibiotice S.A. accurately and rigorously reflect the nature of the business purpose, so that business transactions are truthful, complete, and unaltered.

3. Conflicts of interest

Business decisions of Antibiotice S.A. are based on what is best for the company and its employees, before any individual advantage of an employee or group of employees.

We make business decisions based solely on objective criteria and professional judgment and are never improperly influenced by our personal, social, financial or political interests and do not allow a competing individual or group interest to interfere with making business decisions that could jeopardize our reputation, honesty and fairness of Antibiotice S.A.

4. Data confidentiality

We protect the personal data we collect from our employees, customers, healthcare professionals and any other stakeholders. We are also committed to complying with all applicable data privacy laws. When we use personal data as part of business activities of Antibiotice S.A.:

- we use the least amount of personal data necessary;
- we share personal data only with those who need to know it;
- we store personal data in complete security;
- we delete personal data when it is no longer needed.

5. Human rights

Antibiotice S.A. respects nationally and internationally recognized human rights. We make sustained efforts to avoid violating the human rights of employees, customers, suppliers, communities and other stakeholders.

We strive to prevent and mitigate negative impacts on the rights of individuals with whom we engage, whether in our own business operations or through business relationships. We promote a positive and inclusive work environment that respects the individual and is free from any form of discrimination or harassment.

6. Communication with collaborators and medical professionals

We communicate with healthcare professionals about our products to encourage their informed use so they can make the best treatment choices for the benefit of their patients' health.

Protecting patient health is the primary purpose of the Internal Code on the promotion of medicines. We promote our products only for the therapeutic uses for which they have been approved by the appropriate regulatory authority, in a manner that is truthful, accurate, not misleading, balanced and consistent with the approved product label. Off-label promotion of the Antibiotice products of any kind is prohibited.

We support the exchange of scientific information about our products to ensure that the medical community is fully informed, providing also information about new products.

7. Social Media and digitalization

Antibiotice S.A. uses social networks and digital solutions in a compliant manner, for communication specific to business relationships. We never use social media to inappropriately promote the Antibiotice products.

For business-related communication, we only use digital solutions controlled or approved by specific regulatory authorities.

We support the responsible use of digital solutions and new technologies that contribute to a better quality of our products and help optimize the business.

II. Business ethics in our interactions

1. Relationship with civil servants

We interact with public officials ethically, responsibly and transparently. We never give or offer anything to a public official to obtain undue benefits of any kind.

The term civil servant broadly covers politicians and other employees of any government body, its departments, agencies or instrumentalities, in companies owned or partly owned by a government, or in international governmental organizations.

The majority of medical and scientific personnel is regarded as part of the public service when working.

2. Healthcare professionals and healthcare organizations

We believe that interactions with healthcare professionals and healthcare organizations have a profound and positive impact on the quality of the products developed and marketed by Antibiotice S.A. We are committed to the highest ethical standards and comply with applicable laws and regulations in every aspect of our relationship with healthcare professionals and healthcare organizations.

We interact with healthcare professionals and healthcare organizations in many ways, including our research and development activities, medical information communications, educational efforts, and promotional activities to provide, exchange, or obtain other scientific or educational information.

All of these interactions have a valid scientific and business purpose and are in compliance with all applicable laws and pharmaceutical industry codes. We never give or offer to healthcare professionals and healthcare organizations to unduly influence their prescribing or purchasing decisions, and we comply with all laws and regulations regarding reporting interactions with them.

3. Patients and patient organizations

The Antibiotice's goal is to make products as good and accessible as possible for patients. We treat patient information with respect and protect its confidentiality. We believe that the exchange of valuable information and feedback from patients and patient organizations is vital for the continuous improvement of our products. We are guided by the principle that a patient-centered business approach requires regular and systematic engagement and dialogue with patients or their representatives.

Antibiotice S.A. complies with applicable national and international laws governing interactions with patients and patient organizations. We ensure transparency, inclusion and high ethical standards in our interactions with patients and patient organizations.

4. Third party representatives

Partnerships with third parties are essential to achieving our business objectives. We adhere to high ethical standards in our relationships with them and we also expect third parties who work on our behalf or in our interests to meet high standards of performance and integrity. We also encourage them to demand the same from their business partners.

We pay special attention to companies or individuals who represent Antibiotice S.A. in business matters, i.e. who provide certain services and, as part of the provision of such services, act on behalf of or in the interest of the company towards public officials, healthcare professionals and healthcare organizations, patients and patient organizations.

This Code of Ethics and its Annexes were adopted by the Board of Directors of Antibiotice S.A. at its meeting held on 11 June 2015 and were last revised at the meeting of the Board of Directors held on 15 May 2025.

Antibiotice