



**Astro Pharma**  
Code of Conduct  
2021

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## FOREWORD FROM MANAGEMENT

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Dear colleagues,

Every decision that everyone in this company makes is of great importance. Their actions influence our company. It is therefore important that we understand the ethical, moral, and legal requirements that underlie our business in order to conduct it in accordance with our corporate values. We have set out these requirements in this Code of Conduct.

We encourage you to study our Code of Conduct carefully and to abide by its provisions, in addition to all other relevant regulations.

Our Code of Conduct is intended to help us to continue to be perceived as a respectful, considerate, and responsible company.

We thank you very much for your support!

The company founders

Sabine Möritz-Kaisergruber & Helmut Kaisergruber



## TABLE OF CONTENTS

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FOREWORD FROM MANAGEMENT	3
TABLE OF CONTENTS	5
1. INTRODUCTION	7
2. LOBBYING AND PUBLIC AFFAIRS	9
3. FAIR COMPETITION	11
4. NO CORRUPTION NOR BRIBERY	13
5. EQUAL TREATMENT AND ANTI-DISCRIMINATION	17
6. HEALTH AND SAFETY AT THE WORKPLACE	19
7. SAFETY OF PHARMACEUTICAL PRODUCTS/ DRUG SAFETY	21
8. DATA PROTECTION	23
9. CONFIDENTIAL INFORMATION AND THIRD-PARTY RIGHTS	25
10. APPEARANCE AND COMMUNICATION	27
11. ADVERTISING	29
12. LIST OF ABBREVIATIONS	32



# 1. INTRODUCTION

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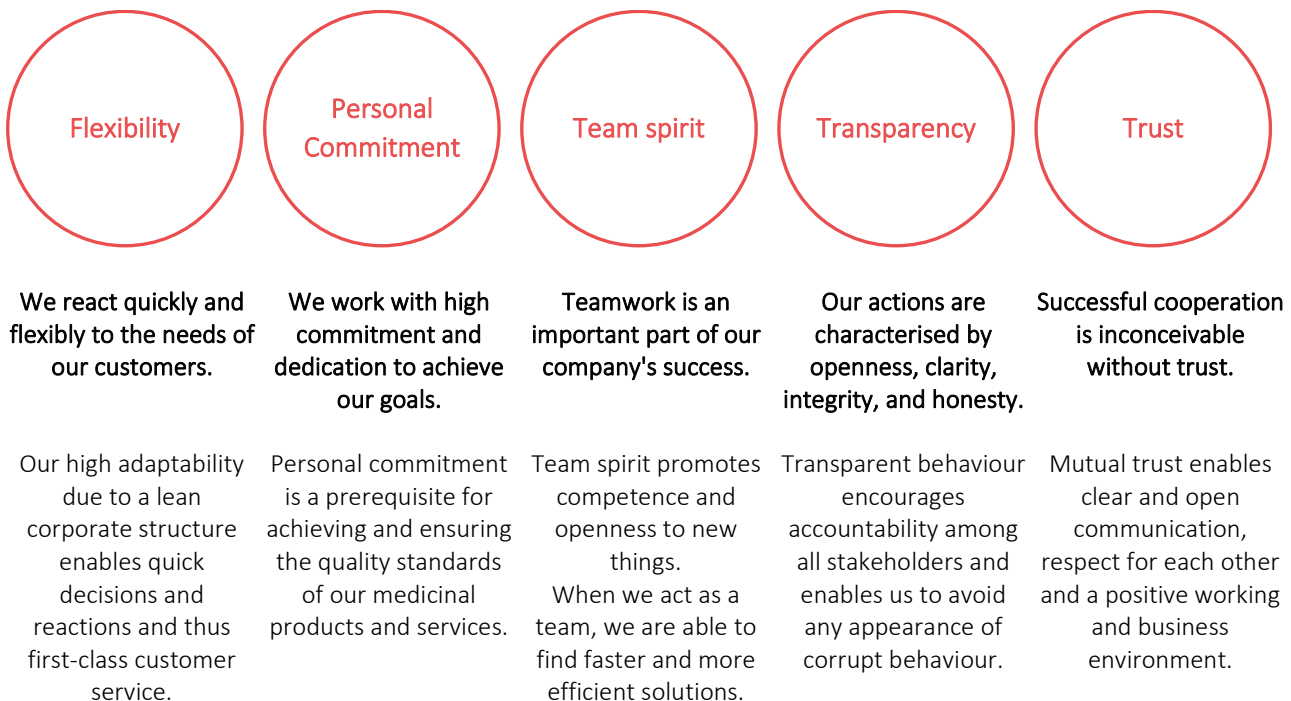
## 1.1. Who we are

Astro Pharma is a family-run pharmaceutical company. We employ around 35 people and sell our own medicines as well as medicines from international partner companies.

## 1.2. Our company objectives

Our goal is to respond quickly and flexibly to the needs of our customers with our offerings. We want to supply the market with affordable medicines and niche products that are indispensable for the health care system of the future and sustainably relieve it. Furthermore, we offer medicines that are economically unattractive for other companies. If it is brought to our attention that certain medicines are not available on the market, we do everything in our power to make these medicines available. The wishes of our customers have the highest priority.

## 1.3. Unsere Unternehmenswerte



## 1.4. Astro Pharma's Code of Conduct

Astro-Pharma adheres to the highest standards required of a distributor in the pharmaceutical market, which are derived in particular from the public's expectations of the behaviour of a professional pharmaceutical company. We make every effort to ensure that our business partners and employees comply with all applicable regulations and pursue the same high moral and ethical standards of quality and conduct.

This Code of Conduct sets out our standards and values. It has been developed to support our employees in their efforts to uphold these standards and values. Our Code of Conduct describes our policies and beliefs on which our company is built and by which all employees are guided. It serves as a compass that not only provides the framework for our legally correct behaviour, but also reflects the values we believe in and act upon.

As a founding member of the Biosimilars Association Austria (BiVÖ), Astro Pharma is subject to the association rules of Medicines for Europe, the European association for generics and biosimilar suppliers, which also reinforce and guide us in our standards and values.

## 1.5. Field of application and usage

The Code of Conduct is addressed to all employees of Astro Pharma. Each section of the Code of Conduct consists of three parts: *Our Principles*, *How do we act properly?* and *What actions do we take?*

## 1.6. Adhering to the rules

The management and the respective department management are responsible for ensuring that the guidelines of the Code of Conduct are understood and implemented. Regardless of hierarchical level or employment status, every employee is obliged to observe and comply with the Code of Conduct.

If the Code of Conduct or other legal regulations or instructions or other internal company guidelines are not observed, this can lead to consequences under labour law. In addition, such violations may also have criminal and civil law consequences for the person concerned.

## 1.7. Contact

If you have any questions, would like to give feedback or recommendations, you can always contact the management or your department management.



## 2. LOBBYING AND PUBLIC AFFAIRS

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### 2.1. Our Principles

Any participation on the part of our company concerning economic policy issues and matters related to the pursuit of our corporate objectives is always carried out in compliance with all applicable regulations, to which we adhere without exception. These include in particular the Medicinal Products Act (AMG) and the General Social Insurance Act (ASVG).

In addition to complying with applicable law, we always remain politically neutral and do not support political parties or office holders either materially or financially.

As a member of the BIVÖ, Astro Pharma is committed to fair competitive conditions in the pharmaceutical biosimilars industry. The BIVÖ is a voluntary representative of the interests of Austrian biosimilar suppliers and plays an active role in shaping and exchanging views with political and other initiatives that directly or indirectly affect the biosimilar market.

## 2.2. How do we act properly?

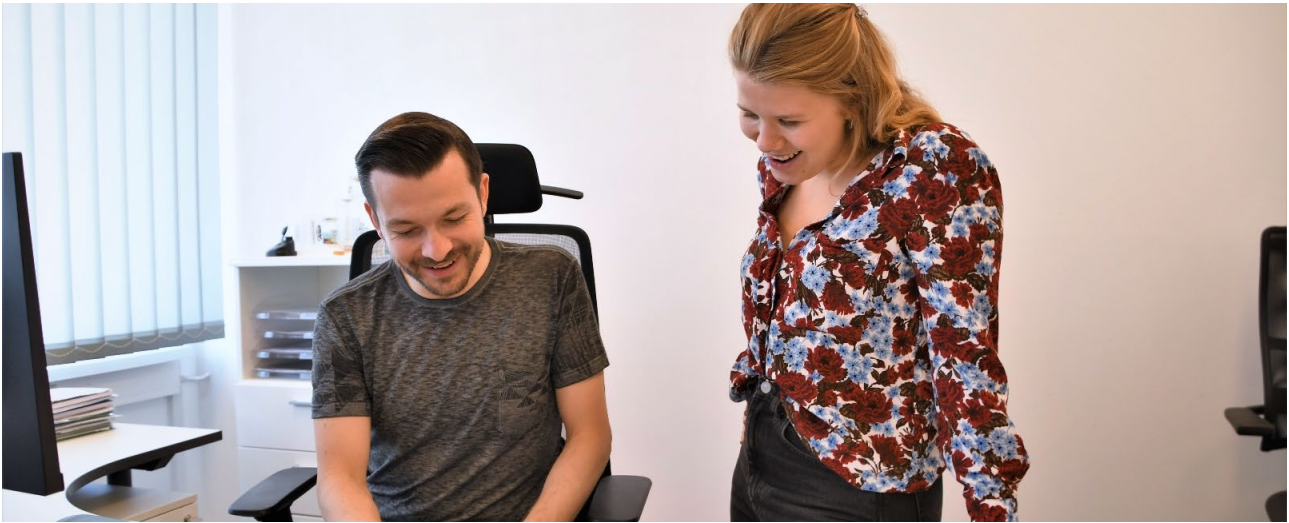
- Corruption: We never misuse lobbying for corrupt or illegal purposes or exert undue influence.
- No encouragement to violate rules: We do not encourage anyone to violate applicable rules or standards of conduct for our own interest or the interest of third parties.
- Fairness, transparency, and integrity: Any lobbying activities are characterized by fairness, transparency, and integrity. We ensure that all published information is up to date, factual and not misleading. We disclose all business interests of the company as far as legally required.

## 2.3. What actions do we take?

- Training courses: We offer training and educational programs to make our employees aware that they are doing their job correctly and within the framework of the law.
- Transparency: We document all activities, communications, and discussions. Disclosure is made where legally required.

### 3. FAIR COMPETITION

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#### 3.1. Our Principles

Astro Pharma believes in free, fair, and efficient competition. For this purpose, compliance with legal regulations, in particular competition law, is of crucial importance. All business relationships conducted by Astro Pharma are based on contractual agreements with the respective business partners. However, Astro Pharma does not enter into any agreements that interfere with market activities in a legally impermissible manner or promote conflicts of interest.

### 3.2. How do we act properly?

- Price and offer agreements: We do not exercise any influence on competitors about bidding conditions, price fixing, tenders, or applications.
- Collective boycotts: We do not enter into agreements with competitors regarding customers not being supplied and suppliers not being sold to.
- Market sharing: We do not participate in reserving or distributing sales territories, customers, or product lines.
- Quotas: We avoid a common restriction on the quantities of medicines produced and/or sold.
- Monopolization and dominance in the market: Our market presence is not aimed at abusing our market share to the detriment of competitors.
- Information exchange: We do not share information with sensitive content with any competitor without a legal basis. We do not participate in any unlawful communications or negotiations. We encourage third parties to keep sensitive information to themselves.
- Business agreements with suppliers and customers: We only set resale prices to the extent that this is legally permissible.

### 3.3. What actions do we take?

- Training courses: We offer our employees training and professional development activities to ensure fair competition.
- Contracts: To avoid misconduct as far as possible, we conclude contracts in writing and encourage our business partners and third parties to comply with all legal requirements and to maintain the written form for their contracts.
- Standard Operating Procedures (SOPs): About our quality management, SOPs exist to ensure consistent and correct processes, which provide binding internal guidelines for various processes.

## 4. NO CORRUPTION NOR BRIBERY

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### 4.1. Our Principles

Protecting the integrity of our company is of great importance to us. We are aware that the practice of corruption and bribery could not only affect the reputation of our company, but could also have negative consequences for the reputation of our valued customers and partners.

We firmly believe that there is no room for any form of corrupt business conduct and bribery in our company. Such behaviour is against the ethical and moral principles of our company. We conduct all business with utmost integrity and encourage our business partners to act according to the same principles.

It is expressly forbidden to give, promise or offer bribes in any form to other persons or companies or to demand or accept bribes from other persons or companies.

We support doctors and other members of the medical profession, specialist medical institutions and patient organisations in the performance of their duties only to the extent permitted by law.

We do not grant, offer or promise any premiums, financial or material benefits to persons who are entitled to prescribe or dispense medicinal products, unless these benefits are of little value and relevant to medical or pharmaceutical practice.

For job-related scientific events, the direct or indirect assumption of reasonable travel and accommodation expenses, participation fees and other representation expenses is limited to the main scientific purpose of the event. The assumption of such costs, fees and expenses may not benefit persons other than those authorised to prescribe or supply the product.

Similarly, in connection with sales promotion events, representation expenses must always be strictly limited to the main purpose of the event and may not benefit people other than those authorised to prescribe or dispense.

In the context of supporting scientific educational events, we do not give any direct instructions to the respective organiser and do not exercise any other direct influence on the organiser. Our support is not related to services already provided or intended by Astro-Pharma to the respective organiser. With our support contributions, we do not influence procurement channels and pricing, nor do we have any expectations in this regard.

## 4.2. How do we act properly?

### - Advertising material:

- > We only provide advertising material to persons who are authorised to prescribe or dispense medicines.
- > We only supply advertising material in the form of items of daily use with a negligible commercial and market value which are of importance exclusively for the interests of medical or pharmaceutical practice and do not offer any personal benefit to the addressee.

### - Support of scientific advanced educational events:

- > We only support the organisation of scientific educational events attended by persons authorised to prescribe or dispense medicinal products.
- > Financial support is granted solely for the organisation of the scientific training event and not for the financing of any framework programme or accompanying persons.
- > Our support and the advertising opportunities granted in return for our company are proportionate.
- > The extent and nature of the financial support is documented precisely and comprehensibly.

### - Support for participation in job-related scientific events:

- > We will only pay reasonable travel and accommodation expenses, participation fees and other representation expenses in connection with job-related scientific events and only for persons authorised to prescribe or dispense medicines.
- > The assumption of travel and accommodation costs, participation fees and other representation expenses is strictly limited to the main scientific purpose of the respective event.
- > There will be no support or funding of any framework programme for events.
- > There will be no assumption of costs for third parties, especially for relatives.
- > Purely marketing events are not supported.
- > Each cost assumption must be documented precisely and comprehensibly.
- > Offers of support for participation in job-related scientific events are to be addressed exclusively to the medical institution itself, which can nominate any participants independently of the offer of participation in such an event.
- > We pay attention to any existing approval requirements for participation in job-related scientific events by employers of the respective participants.

### - Representation expenses:

- > Hospitality towards persons authorised to prescribe or dispense medicinal products is only permitted in exceptional cases to maintain business relations and on special occasions. They are not permitted for the initiation of business.
- > We accept hospitality for persons authorised to prescribe or dispense medicines only for a small amount, very irregularly and exclusively in the vicinity of the place of work of the person concerned.

- > We document every catering service precisely and comprehensibly at. We prepare memos on the contents of the conversation and file the invoices.
- > In principle we avoid entertainment programmes. We also do not pay any accommodation or entertainment costs associated with an entertainment programme.
- Donations:
  - > We donate selflessly and voluntarily and always make donations independently of sales transactions.
  - > We document the purpose, amount and recipient of the donation in great detail.
- Distribution of samples:
  - > Physician samples are dispensed in compliance with all applicable legal requirements.
  - > Each delivery of physician samples is documented bindingly and exactly.
- Consulting and other services:
  - > We accept consulting services and other services by doctors and other medical professionals only in connection with their medical activities.
  - > We remunerate consulting services and other services appropriately on the basis of time and effort, whereby the qualification and reputation of the consultant may be taken into account.
  - > We document consulting services and other services and bill them in a comprehensible manner.
- Studies:
  - > We do not carry out our own clinical studies.
  - > We conduct non-interventional studies (NIS) in compliance with all legal requirements.
  - > We report each implementation of a NIS to the Federal Office for Safety in Health Care, explain the scope of the respective NIS and keep a register on this NIS.
- Reporting of misconduct:
  - > Possible misconduct is reported to our compliance department or management.
- Documentation and accounting:
  - > We maintain proper documentation and accounting and expect the same from our business partners.
- Invoicing and payment:
  - > We issue proper invoices and only pay invoices that are also issued by our business partners in accordance with legal requirements.
  - > Before paying the invoices of our business partners, there is always an appropriate invoice control.
  - > We do not make payments in cash and do not accept payments in cash.
- Contact us:
  - > If we have any questions, we contact our supervisor/supervisor.



### 4.3. What actions do we take?

- Employee training: Astro-Pharma employees receive regular training on corruption and bribery. In particular, there are regular training sessions on promotional materials and support for scientific training.
- Training and development opportunities: We support our employees in meaningful training and development opportunities.
- Contracts: We enter into contracts and hold our business partners to abide by those contracts as well as other legal requirements.
- Disclosure: Astro Pharma discloses all monetary benefits and gratuities to physicians and other healthcare professionals, healthcare institutions and patient organizations.
- Accounting and documentation: Astro Pharma is legally obligated to maintain proper documentation and accounting.



## 5. EQUAL TREATMENT AND ANTI-DISCRIMINATION

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### 5.1. Our Principles

We are convinced that innovative and efficient collaboration is only possible if equal opportunity is guaranteed. At Astro Pharma we do not tolerate any discrimination, favouritism, harassment or exclusion on the grounds of religion, gender, ethnicity, belief, age, sexual orientation or disability. Our cooperation is characterised by mutual respect, integrity and fairness. We comply with the provisions of the General Law on equal treatment and other applicable regulations.

Flexibility and adaptability are important pillars of our company. In this context, interdisciplinary knowledge of our employees is particularly important and is supported at all times. Each individual is given the opportunity to develop the skills and abilities necessary to achieve the expected results and outcomes. Achievements are both appreciated and recognised. In addition, we value and promote the diversity of our employees, which can help to further enhance innovation and knowledge sharing.

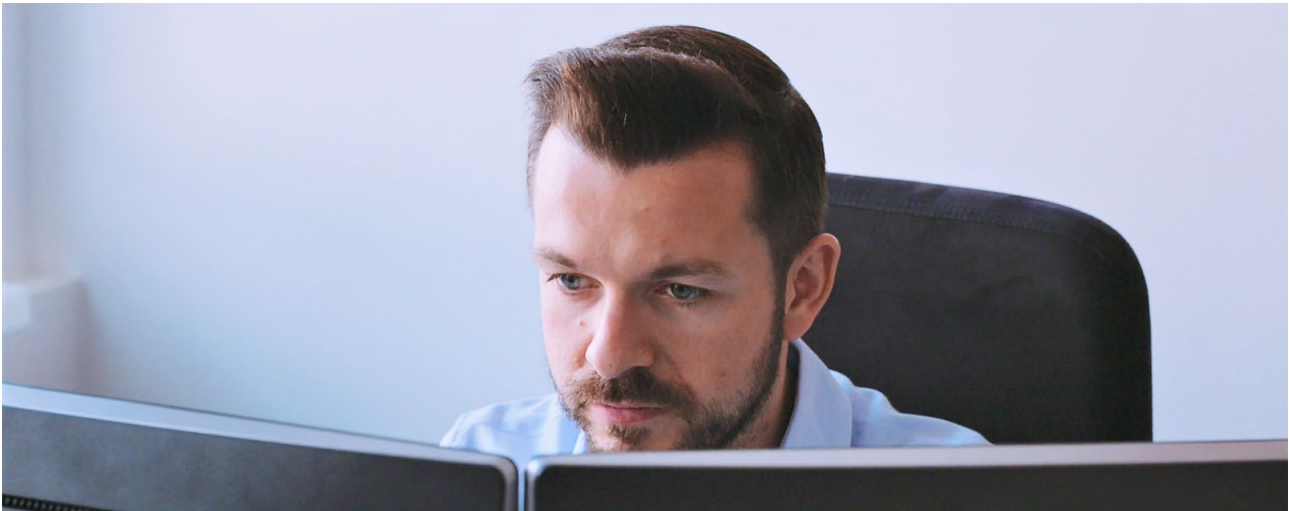
## 5.2. How do we act properly?

- Treatment of people: We treat others as we would like to be treated ourselves.
- Working environment: We support each other in all decisions and create an inclusive and positive working atmosphere.
- Always eager for improvement: We are open to criticism, but are also happy to offer productive feedback.
- Unbiased: We respect differences of opinion and are open to different ideas.
- Personal development: We actively participate in the development of our professional skills and competencies.
- Role of superiors: Our managers and supervisors ensure that our employees feel comfortable and can talk openly about complaints or difficulties.
- Reporting misconduct: If we have reasonable grounds to suspect that a colleague or other person working on behalf of Astro Pharma has violated, may violate or may be violating a law or directive, or is acting in an unethical manner, we are obliged to report this information to our supervisor without delay. If there is any uncertainty, it is best to clarify our concern as soon as possible.
- Working transparently: To minimise the risk of misinterpretation, we disclose all steps of a (potential) conflict of interest. This allows for objective and traceable evidence and can also prevent the extent of discrimination which may take place.

## 5.3. What actions do we take?

- Training courses: We offer training and educational activities to promote trust between each other and ensure diversity.
- Training and development opportunities: We offer training and development opportunities to all our employees in order to remain competitive in the market and to further develop the personal potential of our employees.

## 6. HEALTH AND SAFETY AT THE WORKPLACE



### 6.1. Our Principles

The health of our employees is very important to us. Safety at work is therefore a major topic of concern for us. We also attach great importance to a collegial and social working environment. To ensure that our employees can continue to do their work, we provide them and our visitors with a safe working environment that not only complies with the applicable laws but also reflects our values. We comply with the Employee Protection Law, the Working Hours Act, other regulations and our own internal guidelines. Our employees are protected as far as possible, which includes consideration of physical and mental health, reduction of work stress and safety at work.

To ensure a safe working environment, we need the support and cooperation of all our employees. Our employees comply with all applicable laws, regulations and internal guidelines. In order to appropriately reflect our values and to enable a professionally competent and solution-oriented collaboration, we want to go beyond the minimum requirements. Therefore, we always consider continuous improvement.

### 6.2. How do we act properly?

- Working hours: We adhere to the agreed standard working hours. We only work overtime if ordered to do so by our superiors within the framework of the legal requirements.
- Respecting rest breaks: We as supervisors must ensure that our employees take a rest break of at least half an hour if the total duration of working time on any one day exceeds 6 hours.
- Wellbeing: Before and during conducting business, we consider the health and safety of ourselves and others. If we are a supervisor, we ensure that our employees always feel comfortable and can openly talk about their concerns with us.
- Tidiness: We keep our workplace clean and tidy.

- Safety representative: In the event of health and safety hazards in the workplace, we report these to our safety representative Gabriele Pieslinger-Huber: [Gabriele.Pieslinger-Huber@astropharma.at](mailto:Gabriele.Pieslinger-Huber@astropharma.at).
- First aid: For immediate help in the event of injuries on site, we contact our first aid person Regina Steiner: [Regina.Steiner@astropharma.at](mailto:Regina.Steiner@astropharma.at).
- Opportunities for improvement: We look for opportunities for improvement and we attempt to make colleagues aware of negligent behaviour.

### 6.3. What actions do we take?

- Health and safety procedures: We have established health and safety procedures to deal with everyday occurrences, emergencies and/or unforeseen circumstances.
- Training courses: Due to the high priority of safety at the workplace, we offer training and educational programs to properly educate our existing and new employees.
- Appointed experts: We have an external safety officer and occupational health practitioner, as well as an internal safety officer and first aider to ensure compliance.
- Computer and monitor workstations: There is an annual inspection by an external assessor, the occupational physician and the safety officer to ensure that the computer workstation has been set up correctly.
- Adherence to rest breaks: At the end of the month, supervisors check and verify that rest breaks have been adhered to by correctly documenting work in the time sheet.
- Social initiatives and efforts to promote health: We recognise the value of the well-being of our employees, as this is what enables us to function profitably as a solution-oriented company. Thus, we promote a pleasant, social and collegial atmosphere through various activities and benefits.
  - > Teambuilding events and initiatives: For exercise and mental health, we organise various dining and sports events, we provide our employees with our Astro Pharma e-bike, and much more.
  - > Nutrition: We do not want our employees to work on an empty stomach. That is why we have voluntarily provided for their lunch breaks by giving them daily meal vouchers which they can redeem at their favourite place. We also provide an organic fruit basket every week.
- Additional occupational health and safety: We offer all our employees free annual vaccinations against influenza and pneumococcus.
- Additional facilities: Employees can design and construct their own workplace. If they need additional support for ergonomic and comfort reasons, Astro Pharma is happy to accommodate (e.g. a different chair, extra monitors, footboards, etc.).
- Situation-specific measures: Whether expected or unexpected, Astro Pharma will take specific measures in the case that incidents may occur. Our employees are trained accordingly, information is exchanged on a daily basis and additional health precautions are taken.

## 7. SAFETY OF PHARMACEUTICAL PRODUCTS/ DRUG SAFETY

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### 7.1. Our Principles

The delivery and selling of safe and effective medicines are our highest priority. The aim is to provide the end consumer with a high-quality product.

We comply with Austrian and EU law, other regulations and other legal frameworks, in particular the “österreichische Arzneimittelgesetz” (AMG) of 1983 and the EU Community code relating to medicinal products for human use. The foundation/basis on which we also work regards the Good Distribution Practice (GDP) and the Good Pharmacovigilance Practice (GVP) standards and guidelines, which are internationally recognised and strictly followed by our staff.

Furthermore, Astro Pharma has an experienced and competent Regulatory and Quality Assurance Team, which is dedicated to addressing any changes or queries concerning pharmaceuticals, complaints, or side effects. Not only our Regulatory and Quality Assurance Team, but all Astro Pharma employees have the responsibility to set the highest quality standards within their professional role and to take the necessary measures to deliver safe and high-quality pharmaceuticals, not only to end users, but also to the public, authorities and health care professionals. To achieve this, we also closely cooperate with the authorities.

However, the duties do not end with us. Due to the need to deliver safe medicines to the end consumer, we therefore urge our partners to manufacture, supply, store and distribute high quality products. The production and supply of all medicines must comply with all applicable standards, laws and regulations.

## 7.2. How do we act properly?

- Obligation to report: We report all side effects, complaints, adverse events, medical enquiries or other complaints regarding our products. We immediately and within 24 hours report these to the following e-mail address: [quality@astropharma.at](mailto:quality@astropharma.at).
- Latest status: We ensure that the required information for physicians, pharmacists and patients is kept up-to-date.
- Leadership role: The management team authorise all resources necessary and ensure the correct conditions are in place to attain the quality objectives and standards.

## 7.3. What actions do we take?

- Contracts: We conclude written contracts with those with whom we have an employment relationship.
- Quality Assurance: We have a quality management system to control product risks and ensure safe and uniform standards.
- Pharmacovigilance: At Astro Pharma, we have our own qualified pharmacovigilance unit that deals with all relevant issues. In addition, there is an individual, the Qualified Person responsible for Pharmacovigilance (QPPV). This person looks after and monitors the safety of the pharmaceutical products marketed by Astro Pharma and ensures that the correct standards are met and risks are minimised. This enables a more efficient use of medicines.
- Training courses: Due to the high priority of safety in the workplace and for the end consumer, we offer training and education activities to properly train our employees in how to work safely.
- SOP: In order to ensure consistent and consistent procedures, we have established a number of Standard Operating Procedures (SOP) that provide guidelines for various processes.
- Careful selection: To ensure we maintain our high standards, we only work with reliable and trustworthy partners. We select our manufacturers carefully and with great care so that we can guarantee high-quality products for our customers.
- Qualification and auditing: To ensure that our (potential) partners are reliable, we arrange for them to be qualified and audited.



## 8. DATA PROTECTION

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### 8.1. Our Principles

In the course of our business activities, we also gain knowledge of personal data relating to our employees, business partners and third parties.

Personal data is any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (Section 4(1) of the General Data Protection Regulation).

We are aware that personal data is subject to special protection and that the use of such data is only permitted under special conditions. Personal data must be treated with absolute confidentiality and is subject to the provisions of Austrian and European data protection law.

Only necessary personal data may be processed. Personal data may only be stored as long as this data is necessary for processing. Personal data shall be processed exclusively for agreed purposes and always in a lawful, comprehensible and transparent manner. Personal data shall be kept accurate and up-to-date to the best of our knowledge and belief. It shall be ensured that processed personal data are secured and protected to the maximum extent. Compliance with data protection in the company must be demonstrated at all times.

## 8.2. How do we act properly?

- Procurement and processing: We do not procure or process personal data without authorization.
- Disclosure: We do not disclose personal data to unauthorized recipients inside or outside the company, nor do we make this data available to any other unauthorized persons. We only disclose personal data entrusted or made available to us in the course of our professional employment on the basis of explicit instructions from our respective superiors.
- Earmarked use: We do not use personal data for any purpose other than that which is part of the lawful performance of duties within the scope of our employment.
- Consent and revocation: We ensure that the person involved has given consent for the processing of his or her personal data, that he or she is informed about the purpose of the processing and about the possibility of revoking his or her consent.
- Retention: We delete personal data after the expiry of the purpose for which it was used or the legal deadline.
- Security: We keep personal data secure and protected.
- Obligation to report: We report data protection incidents to the responsible supervisory authority without delay, if possible within 72 hours of becoming aware of them.
- Termination of employment: Our obligations to protect personal data continue even after our employment with the company has ended.

## 8.3. What actions do we take?

- Employee training: We train our employees in the correct handling of personal data.
- Declaration of commitment to data protection: Every employee signs a corresponding declaration upon taking up employment, stating that he or she has been trained and instructed in connection with the obligation to safeguard data protection rights.
- Responsible persons: Data protection managers and deputy data protection managers have been appointed in the company who are responsible for data protection compliance and are the contact persons for questions relating to data protection.
- Processing directory: We maintain a processing directory to provide evidence of data protection compliance.
- Contracts: Our business partners are contractually obligated to protect personal data in addition to existing legal obligations.
- SOP: In order to ensure consistent and correct processes, we have established several Standard Operating Procedures (SOP) which provide guidelines for different processes.



## 9. CONFIDENTIAL INFORMATION AND THIRD-PARTY RIGHTS

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### 9.1. Our Principles

The protection of confidential information, hereinafter referred to as business and trade secrets, is an essential part of our corporate strategy.

Business and trade secrets are understood to be facts and findings of a commercial or technical nature which are known only to a specific and limited number of persons, are not intended to penetrate beyond this group of persons and in the confidentiality of which there is an economic interest.

Not only our own business and trade secrets are to be protected, but also those of our business partners of whom we gain knowledge in the course of our business activities. This information is to be treated as absolutely confidential and in accordance with the provisions of Austrian and European competition law. We do not tolerate industrial espionage.

In general, business and trade secrets will not be disclosed to unauthorized third parties, nor will they be used without authorization for our own interests or the interests of third parties. The disclosure or use of business and trade secrets is only permitted with the corresponding approval of superiors and/or if it is required by the employee's respective activity.

Business and trade secrets are protected regardless of whether knowledge of them was obtained in the course of the employee's own business activities or outside the scope of our company, and regardless of the form in which they are available.

Mobile devices shall be protected from access to confidential data through theft or loss, tampering of devices through software, unintended and unnoticed data leakage through cloud services.

Our business partners are required and contractually obligated to maintain trade and business secrets. In addition to safeguarding business and trade secrets, we respect the intellectual property rights of third parties.

## 9.2. How do we act properly?

- Conscious disclosure of information: Before disclosing information, we consider whether the information in question could constitute business and trade secrets and whether we are authorized to disclose it.
- Information Retention: We keep trade and business secrets secure and protected.
- Access Data: We keep entrusted user passwords, passwords and other access authorizations carefully stored and confidential.
- Mobile devices: We store as little official data as necessary and possible on mobile devices.
- Conflict of interest: We do not use confidential information for our own interests.
- Termination of employment: Our obligations to protect business and trade secrets continue even after our employment with the company has ended.

## 9.3. What actions do we take?

- Employee training: We train our employees in the proper handling of business and trade secrets.
- Declaration of commitment to maintain business and trade secrets: Each employee signs a corresponding declaration upon commencing employment stating that he or she has been trained and instructed in connection with the obligation to maintain business and trade secrets.
- Guideline for handling data carriers / private devices: Each employee receives and signs appropriate instructions upon commencement of employment, the purpose of which is to minimize the risk of unintentional leakage of data to third parties.
- Contracts: In addition to existing legal obligations, our business partners are contractually obligated to maintain business and trade secrets.
- SOP: To ensure consistent and correct processes, we provide appropriate guidelines in SOPs.

## 10. APPEARANCE AND COMMUNICATION



### 10.1. Our Principles

It is of particular significance in the pharmaceutical industry to communicate reliable information. This is linked to the innovative mindset that Astro Pharma applies, as this requires clear, transparent, secure and efficient communication. We as a company interact with the outside world in an appropriate way, and that is why we manage to maintain our good reputation. Astro Pharma ensures that all information that comes into the public domain is carefully checked, is accurate, and is truthful. This applies to publications, the company website and all other forms of advertising.

We conduct ourselves in a professional and respectful manner towards each other, our business partners and third parties, in particular to protect the professional and business reputation of all parties involved. Our employees ensure an appropriate tone and behaviour in their communication. We expect the same professional and respectful interaction from our business partners and third parties.

Our employees always dress correctly and professionally. All forms of communication, in particular our documents, e-mails and presentations, are appropriate and adequate in content and form and are designed as uniformly as possible in their structure.

Private statements are to be marked as such by our employees. Social media increases the reach of communication and therefore the boundaries between private and professional information are difficult to define. As social media increases the range of communication, we expect our employees to pay special attention to maintaining the good reputation of Astro Pharma.

## 10.2. How do we act properly?

- Communication only with authorisation: Without any authorisation we must never communicate on behalf of Astro Pharma.
- Dissemination of information: Clear and accurate communication is particularly important when it concerns financial, customer or partner information and published reports. Therefore, we should not disclose unauthorised information, especially if it is sensitive data. If we are authorised to disclose information, we must do so reliably and honestly.
- Protecting our reputation: We report situations that could lead to damage to Astro Pharma's reputation. We generally refrain from and avoid all activities that could damage the reputation of Astro Pharma or its stakeholders.
- Clothing: We take special care to be professionally dressed when we meet customers or partners.
- Objective information: We should not distribute/publish misleading information, and only disseminate information that is as objective as possible.
- Transparency: When we privately express our opinions, whether it is on social media, with a person or a group, we must be transparent. We must articulate that this is our opinion and does not necessarily represent the reality and opinion of the company.
- Avoiding conflicts of interest: We separate and distinguish our private interests from those of the company. We always act in the interest of the company and pay close attention to ensuring that our interaction with interest groups is professional.

## 10.3. What actions do we take?

- Training courses: Due to the high priority of communicating clearly, correctly and transparently in the pharmaceutical industry, we offer training and education activities to adequately train our employees in dealing with such matters.
- Sample documents: We provide formats and templates of company documents to help employees comply with existing rules.
- Letterheads and signatures: The content details in our letterheads and signatures in electronic communication comply with the legal requirements.

## 11. ADVERTISING

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### 11.1. Our Principles

An important part of our communication is advertising. As a pharmaceutical company, we are not only legally, but also ethically obliged to follow the guidelines, specifications and directives. We promote our company and products to the public by using company and product names through standard sales promotion channels exclusively within the scope of applicable rules.

Within the framework of the promotion of medicinal products to the persons authorized to prescribe or dispense them, it is prohibited to grant, offer or promise them a premium, financial or material benefits, unless these are of minor value and relevant to medical or pharmaceutical practice.

Occasional or honorary gifts are only permissible if they are customary in the relevant public, are occasion-related, are of low value and are permitted under the internal organizational regulations of the recipient's respective employer. These donations are strictly linked to the person of the recipient and his medical or pharmaceutical activity, but may fall outside the criterion of medical or pharmaceutical need.

Donations are always made voluntarily and altruistically. Medical samples are given strictly in accordance with the regulations of the pharmaceutical law.

In general, we only support those profession-related scientific events attended by persons authorized to prescribe or dispense medicinal products. Representation expenses are only permissible in exceptional cases to maintain business relationships or on special occasions.

In connection with professional scientific events, we will cover reasonable travel expenses, accommodation costs and participation fees exclusively for persons authorized to prescribe or dispense medicinal products. Entertainment programs are to be avoided as a matter of principle.

Persons authorized to prescribe or dispense medicinal products will only be commissioned with consulting services, lecturing and moderating activities if these services and activities are related to their medical or pharmaceutical activities and are of relevance to us. These services and activities are appropriately remunerated on the basis of time and effort, whereby the qualifications and reputation of the person commissioned may also be taken into account.

The promotion of prescription drugs and products to patients and other persons not authorized to prescribe or dispense drugs is prohibited. Information about human health or diseases is exempt from this prohibition, provided that it does not refer directly or indirectly to a medicinal product.

## 11.2. How do we act properly?

- Advertising material value: Advertising and information materials that we dispense are items of negligible commercial and market value.
- Purpose of advertising material: Advertising and information materials we dispense are relevant to medical or pharmaceutical practice and are not primarily for the recipient's private purposes.
- Timeliness and Verification of Information: Promotional and informational materials we dispense are up to date and truthfully reflect promotional content. We regularly review promotional materials for relevance and timeliness.
- Occasional and Honorary Gifts: We provide occasional or honorary gifts only in appropriate amounts and only in connection with the recipient's medical practice, such as promotion, practice start-up, retirement.
- No support for marketing events: We do not provide support for marketing-only events. We support only professional scientific education events.
- No support of companions: We do not cover expenses for companions, especially dependents.
- No support of entertainment programs: We do not support entertainment programs. Nor do we cover any lodging or entertainment costs associated with an entertainment program.
- Consulting services, speaker and moderator activities: We only engage service providers whose professional activities are related to the topics of the service.

### 11.3. What actions do we take?

- Consulting: We always have medical or scientific advice available during the preparation and before the release of advertising and information materials to ensure the accuracy of the content of the advertising and information materials.
- Employee training: We train our employees in the proper handling of promotional and informational materials.
- Responsible persons: Information officers and deputy information officers have been appointed in the company who are responsible for ensuring compliance with the requirements for advertising and information materials and are the contact persons for questions relating to advertising and information materials.
- Contracts: We contractually secure support for professional scientific events as well as consulting services, speaker and facilitation activities to demonstrably meet the respective legal requirements.
- Release process: There is a standardized release process with subsequent release by the information officer.
- SOP: In order to ensure consistent and correct procedures, we have established a number of Standard Operating Procedures (SOP) which provide guidelines for various procedures.
- Duty of disclosure: Astro Pharma discloses all monetary benefits and donations to physicians and other healthcare professionals, healthcare institutions and patient organizations.

## 12. LIST OF ABBREVIATIONS

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- AMG – Medicines Law (Arzneimittelgesetz)
- ASVG – Law on general health insurance (Allgemeines Sozialversicherungsgesetz)
- BiVÖ – Biosimilars Association Austria (Biosimilarsverband Österreich)
- GDP – Good Distribution Practice
- GVP – Good Pharmacovigilance Practice
- QPPV – Qualified Person responsible for Pharmacovigilance
- SOP – Standard Operating Procedure