

A top-down view of a diverse group of people's hands stacked in a circle, symbolizing unity and teamwork. The hands are of various skin tones and are wearing different accessories like watches, rings, and bracelets.

# CODE OF CONDUCT

*Needs.*  
*Science.*  
*Trust.*



*In all our business endeavors, we remain committed to doing what is right and will not compromise our values or ethical standards.*

## A Reflection of our Values

Our values serve as an internal compass.

This Code of Conduct is intended to express our commitment to ethical behavior and transparency, not only to ensure the quality and effectiveness of AOP Health products, but also to encourage and support all employees and third parties working on behalf of or for AOP Health in an appropriate manner.

The Code of Conduct should serve as a guide for decision-making. However, our guidelines do not relieve us of our personal responsibility to make independent and well-considered judgements and to act accordingly. In all our business endeavors, we remain committed to doing what is right and will not compromise our values or ethical standards.

Guided by our values paired with our good judgment, we do what is right, we use the resources described in this Code of Conduct and we take responsibility for our actions.

Violations of this Code of Conduct will not be tolerated and may lead to disciplinary action, including termination of employment. We expect and encourage all employees to comply with these standards of business conduct, especially during the performance of their professional duties.

By living our values and achieving our mission, we are and shall continue to be a pioneer in healthcare.

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*It's all about  
the people*

## Scope

This Code of Conduct, approved by the Governing Board of AOP Health International Management AG, applies to all its legal entities and representative offices throughout the world (together the “AOP Health Group” or “AOP Health”).

The Code of Conduct is primarily addressed to employees of AOP Health. Employees who engage third parties shall make such third parties familiar with the principles of this Code of Conduct and seek their cooperation in complying with it, including, where possible, establishing a contractual obligation to act in accordance with the Code of Conduct when working on behalf of or for AOP Health.

In their personal decisions, irrespective of their location and nature of work, all employees are expected to read and comply with the Code of Conduct in form and content. In cases of doubt about correct behavior, employees seek advice from their line managers, supervisors, AOP Health’s Human Resources Department and/or Legal Department before acting. AOP Health does not tolerate violations of the Code of Conduct and is fully committed to handling non-compliance cases adequately.

AOP Health believes that every employee is an ambassador, regardless of job responsibilities, job title or role within the company. By following our Code of Conduct, each of us act as role models for our peers, business partners, customers, and others with whom we engage. Managers are expected to serve as positive role models and to help employees review, understand, and apply the Code of Conduct.

Whenever we become aware of a violation of this Code of Conduct, AOP Health policies or the law, we will address the problem immediately and prevent future occurrences. Depending on the circumstances, corrective and preventive steps might include training, counseling, and disciplinary actions.



*Employees who engage third parties shall make such third parties familiar with the principles of this Code of Conduct and seek their cooperation in complying with it, including, where possible, establishing a contractual obligation to act in accordance with the Code of Conduct when working on behalf of or for AOP Health.*

## **Needs.**

*Our work is guided by the needs of patients, health-care professionals, and all other stakeholders.*

## **Science.**

*Our research and innovation lead to effective products and therapies for patients.*

## **Trust.**

*Our main goal and our main driver of success is to be a reliable partner through our work as well as our products and solutions.*

# AOP Health Purpose Statement

## Needs. Science. Trust.

The AOP Health Group incorporates several companies including AOP Orphan Pharmaceuticals GmbH with its seat in Vienna, Austria (“AOP Health”). The AOP Health Group is the European pioneer for integrated therapies for rare diseases and in critical care. Over the past 25 years, the Group has become an established provider of integrated therapy solutions operating from its headquarters in Vienna, its subsidiaries and representative offices throughout Europe and the Middle East, as well as through partners worldwide. This development has been made possible by a continually high level of investment in research and development on the one hand and a highly consistent and pragmatic orientation towards the needs of all its stakeholders on the other – especially the patients and their families as well as the doctors and healthcare professionals treating them.

As a privately owned corporate group, AOP Health is dedicated to developing personalized treatments for patients with rare diseases and in critical care. AOP Health’s vision and mission are focused, solution-driven, and decisive. AOP Health experts adapt to new challenges and emerging trends at an early stage, responding to changes in the industry landscape without delay. AOP Health Group operates with a global approach and presence from the Group’s headquarters in Vienna, Austria.

The Group is led by a Governing Board comprised of members with extensive experience in the pharmaceutical industry, financial stability as well as a strong focus on research and development (R&D). Approximately 20 % of the revenue is re-invested in new R&D projects.

As a European pioneer for integrated therapies for rare diseases and in critical care, AOP Health Group develops, manufactures, and markets innovative solutions in the therapeutic areas of HematoOncology, Cardiology & Pulmonology, Intensive Care, and Neurology & Metabolic Disorders.

# AOP Health Values





## Compliance with Laws and Regulations

At AOP Health we are committed to following all laws and regulations applicable to our business activities, especially those designed to protect patients and improve the quality of medicinal products and healthcare services.

We expect all employees to cooperate with internal AOP Health audits and investigations by providing honest, truthful, and complete information.

These areas are important to us and our commitment to them makes us trusted partners. Our ethical principles and our ethical decision-making framework guide us in implementing these commitments and help us in doing what is right.

We are all accountable for the reputation of AOP Health. We expect employees to always act ethically and responsibly in accordance with our values and standards, this Code of Conduct, as well as in accordance with AOP Health policies and all applicable procedures.

We ensure that we comply with applicable local laws and regulations. With this commitment, we also have the responsibility to “speak up” and report identified or potential violations.

“

*We respect and adhere to the laws and regulations governing our industry. As a globally active company, we recognize that laws and regulatory requirements of one country may not apply to our activities taking place in another country.*

”

**Anna Damgaard Jensen LL.M.**  
Chief Legal Officer





## Conflict of Interest

Everyone at AOP Health is responsible for avoiding situations that present – or even create the appearance of – a conflict between their own interests and those of AOP Health.

We avoid situations where our personal interest conflicts or appears to conflict with those of AOP Health. We avoid situations where anyone could question whether we were inappropriately influenced in making a business decision.

We will never abuse our position or AOP Health's property for our own personal benefit. We always conduct business in a way that serves the interests of AOP Health and is not influenced by personal, family, or financial interests.

We will not participate in any decision that could bring our own interests into conflict with those of AOP Health. We will not misuse our employment status to obtain advantages or benefits for relatives or persons close to us. We carefully consider potential conflicts of interest before making decisions.

We do not seek payments, fees, loans, or free services from any person or AOP Health as a condition of doing business with AOP Health.

We may accept gifts only to the extent they are permitted under applicable law and according to AOP Health's Gifts & Giveaway Guideline. We do not accept gifts of cash or cash equivalents.

We resolve any potential conflicts of interest in a transparent and open manner. In the event of an actual or potential conflict of interest we consult with our Legal Department to find an appropriate solution.





## Anti-Corruption & Anti-Bribery Laws

Corruption undermines trust in governments and businesses and reduces access to public services, including health and education.

Corruption is dishonest or fraudulent behavior that distorts the free market and, when committed by a company, threatens its economic position and damages its reputation.

Employees and business partners of AOP Health may not - directly or indirectly - grant or promise unfair advantages to individuals or organizations to obtain new contracts or retain existing ones, nor may they demand or accept such advantages.

Unfair advantages are, in particular but not limited to, illegal discounts, bribes, kickbacks, and underhand payments. Unfair advantages may relate to all assets, including payments, meals, gifts, entertainment, travel expenses and sham arrangements.

AOP Health and its business partners must always be aware that external perception plays a major role. We never bribe or offer, provide, or promise anything of value (directly or indirectly) that is intended to improperly influence the action of organizations, public officials, or private individuals.

In internal decision-making processes, we ensure that all laws, internal guidelines, standard operating procedures ("SOPs"), processes, and approvals are adhered to.

Through annual mandatory in-house training measures, we ensure that our employees are up to date with applicable legal restrictions, obligations, and guidelines.



## Anti-Trust Law & Fair Competition

AOP Health believes that customers and society as a whole benefit from fair and open markets.

Anti-trust laws serve to protect free competition. They prohibit commercial conduct aimed at preventing, restricting, or distorting competition or has the effect of doing so. This includes, for example, price fixing or the allocation of market segments or customers.

We conduct business fairly, transparently and in alignment with applicable laws. We seek to compete in our industry based on the merits of our people and products. We do not participate in unethical business practices such as deceptive marketing, unauthorized use of confidential competitor or customer information, or the theft of trade secrets.

AOP Health respects the legitimate interests of competitors and expects them to comply with all applicable laws and industry guidelines.

When engaging with competitors and business partners regarding our products, customers, distributors, or the territories where we operate, we strictly adhere to applicable law.

Managing directors, supervisors, and all staff with management responsibilities are responsible for ensuring that all AOP Health employees and third parties working on behalf of or for AOP Health are aware of and comply herewith.



# Privacy & Data Protection

We respect the privacy of our employees, patients, business partners, and healthcare professionals. We are committed to protecting the integrity of all personal data collected and/or processed by AOP Health.

Protection and responsible handling of personal data are the basis of our daily business and comprise valuable elements in the development of an innovative approach to medical care. We are committed to collecting and processing (personal) data in a lawful, fair, legitimate, and ethical manner and to always respecting the privacy of the individual living up to the trust placed in AOP Health.

Any information relating to an identified or identifiable person is processed in accordance with applicable data protection laws (in particular, but not limited to the EU General Data Protection Regulation). Employees gain access to personal data on a need-to-know basis only, receive regular inhouse training and are expected to know and observe the principles of data protection. Where needed or required, we inform and/or obtain consent from individuals regarding collection, processing, and disclosure of, as well as access to their personal data.

We do not share or entrust personal data to third parties outside of AOP Health unless they have a legitimate need to know and ensure that appropriate confidentiality obligations and data protection measures are in place. Further, in some cases, where it is necessary to have personal data collected or processed outside of the EU, AOP Health aims to ensure that an adequate level of data protection is adhered to.


“

*At AOP Health, we are committed to fostering an environment in which our associates can unfold their full potential and are recognized for their contributions.*

”

**Gwenaelle Kerforn**  
Chief Human Resources Officer





*All employees work to safeguard our patents, trademarks, copyrights, trade secrets, and other proprietary information and know-how.*

## Confidentiality

AOP Health's information, knowledge and intellectual property (IP), are key drivers of our success.

Confidential information can include but is not limited to sales, marketing and other corporate databases, intellectual property strategy and plans, marketing strategies and plans, pricing information, sales information, non-public financial information, customer and employee records, manufacturing techniques, research and technical data and information regarding new product development.

We respect and maintain the confidentiality and integrity of information provided to us by our business partners. Our employees are aware of and trained on the importance of keeping information confidential.

In addition, employees will not take advantage of confidential information about AOP Health or its business partners for personal financial gain or pass that information to others, including friends or family members.

Our employees may have access to non-public information in connection with our business in a variety of ways. All proprietary and confidential information of AOP Health and of its stakeholders and business partners is maintained in strict confidence, except when disclosure is authorized by AOP Health, the disclosing party or required by law. This obligation continues even after termination of employment at AOP Health.

We ensure adherence to such confidentiality and non-disclosure obligations by imposing such obligations on our employees prior to their disclosure to any such information. We respect the intellectual property rights of third parties and clarify the situation with the experts in case of doubt.

“

*AOP Health has successfully developed a number of innovative treatment options, guided – above all – by patients' needs.*

”

**Dr. Christoph Klade**  
Chief Scientific Officer





*Our values and standards form the basis of our sustainable growth and overall success. We ensure that our business partners, who we see as collaborators in our success story, share our commitments and values.*

## Partnerships with Business Partners

AOP Health deals with its business partners based on integrity, high quality of the requested products and services, availability, best suitability and innovation.

AOP Health expects all employees to promote the values and standards established by this Code of Conduct. These very same expectations are also applied towards our AOP Health business partners such as external consultants, partners, agents, suppliers, vendors, or other entities acting on behalf of AOP Health. AOP Health seeks to ensure that business partners follow all applicable laws, regulations, industry codes and contractual obligations. Adherence to corporate social responsibility standards, such as protection of human rights, safety and environment, prohibition of child or forced labor, and anti-corruption, are key factors when collaborating with business partners.

Before entering a long-term business relationship, AOP Health usually conducts a due diligence check of potential business partners to assure itself first-hand of their integrity, quality, suitability, and credibility. Employees are encouraged to report any business partner-related concern to their line manager or to AOP Health's Legal Department.

Business partners can seek help and advice regarding the application of the AOP Health Group Code of Conduct as well as report a potential non-compliant situation directly to AOP Health's Legal Department.

Non-compliance with applicable laws, regulations, industry codes, contractual terms, or corporate social responsibility standards may lead to AOP Health requesting appropriate remedial measures and/or even termination of our cooperation.

“

*AOP Health is fully dedicated to developing new treatments for patients with rare diseases and in critical care. Every day, we do our best to understand and to serve the patients' needs!*

”

**Dr. Martin Steinhart**  
Co-Chief Executive Officer





*We focus on the patients.*

# Patients & Patient Organizations

Sustainable partnerships with patient organizations enable us to gain valuable insights relevant to the work of AOP Health in all therapeutic areas, covering the entire lifecycle of a medicinal product to continuously provide optimal treatment for patients.

AOP Health perceives patients as experts for their diseases and interacts with patients to understand their needs to develop therapy solutions. Furthermore, AOP Health raises disease awareness in cooperation with patient organizations. The purpose of these activities is to enhance patient education, access to healthcare and optimize patient care.

As such, we are committed to act transparently and responsibly in all our interactions with patients and patient organizations. All activities with patients must adhere to the codes of the pharmaceutical industry, AOP Health policies, and applicable procedures, reflecting applicable laws focusing on patient interactions.

We interact with patient organizations to improve patient care by advancing education and awareness. All interactions are aligned with the mission of the respective patient organization.

While, in some instances, we may provide support to patient organizations consistent with this Code of Conduct and AOP Health's policies and applicable procedures, any such support is properly documented and structured to maintain the independence of the organizations.

“  
*Notwithstanding the market complexity and challenges, we at AOP Health consolidate our knowledge, expertise and energy to support patients getting necessary treatments.*  
”

**Mag. Petra Lanz**  
Chief Commercial Officer





*To maintain our reputation and credibility, we are committed to ethical and compliant interactions with healthcare professionals in all our business activities.*

## Interaction with Healthcare Professionals

AOP Health interacts with healthcare professionals (hereinafter also referred to as “HCP” or “HCPs”) for the benefit of the patients.

Our core interactions with HCPs relate to the research and development of new innovative medicines as well as consulting services.

We are committed to ethically promoting our products and services and we recognize the importance of providing healthcare professionals with the accurate scientific and medical information they need to make informed decisions.

AOP Health explicitly does not expect preferential treatment for its products due to its cooperation with HCPs.

We are committed to scientific integrity in all of our research and development activities, and we recognize the important role HCPs play in the development of new products.

We are committed to only engaging HCPs for consultant services where there is a clearly defined need, legitimate purpose and scope. In such circumstances, HCPs are paid according to fair market value for the services provided.



*Quality means consistently satisfying requirements by delivering products and services of the highest value in a timely manner.*

## Safety, Quality Standards & Good Practice

We are committed to meeting or exceeding customer and regulatory requirements regarding research, development, procurement, manufacturing, packaging, testing, supplying, maintenance and marketing our products and services.

Innovation is a key driver in our commitment to continuously improve our products and services in existing therapeutic areas and addressing needs in areas not yet covered by AOP Health. We maintain high-quality standards in everything we do.

We maintain a comprehensive quality assurance and control program to support our compliance with internationally recognized Good Practice guidelines (cGxP), especially Good Manufacturing Practice (cGMP) and Good Distribution Practice (cGDP). Furthermore, we require the same level of quality commitment of our suppliers and business partners.

Patient safety and the timely reporting of adverse events and product complaints are given the highest priority. Employees are trained to report all adverse events immediately and, where applicable, all product complaints. We never compromise quality or safety in anything we do – including meeting deadlines.

We ensure that our business activities comply with applicable health, safety, security, and environmental laws as well as recognized corporate standards and best practices. We take all reasonable and feasible steps to ensure a safe, healthy, and clean working environment.

“

*To provide patients with effective drugs, collaboration is key for success – within and between pharmaceutical industry and academia.*






”

**Dr. Kurt Krejcy**  
Chief Medical Officer







-  BUDDY PROGRAM
-  JOB TRAINING
-  E-LEARNING
-  MENTORING
-  FEEDBACK DIALOGUE

## Working at AOP Health Group

We promote an environment in which everyone feels free to express their ideas and opinions.

The relationship between employees and superiors requires open communication. We regularly conduct employee surveys in which we ask for honest, anonymous feedback to identify areas for improvement. These surveys also measure commitment within AOP Health.

We prioritize our work according to the stated mission, vision, and goals of AOP Health and adjust timelines, budgets, and people in response to changes in our corporate priorities. We offer opportunities for personal and professional growth of our employees. We are committed to a supportive and collaborative work environment where our employees work together to fulfill AOP Health's goals.

AOP Health offers purposeful work. Our products help patients live a better and possibly even a longer life by developing and providing life-saving medication. In order to achieve this overarching, company-wide goal, we offer flexible working hours, option to work from home if the position allows for it, versatile tasks and opportunities for continuing education within an international work environment.

We frequently offer team events to get to know each other better and strengthen our collaborative efforts. Plus, our headquarters in Vienna are a state-of-the-art and sustainable office space.

“

*As an agile international team, we strive for ambitious goals. This requires alignment across countries and functions as well as each one of us feeling accountable for the result. Together we make a difference, and AOP Health a great place to work.*”

**Bernhard Nachbaur LL.M.**  
Co-Chief Executive Officer





*We value and manage diversity through an inclusive environment.*

# Diversity, Equality & Inclusion

In honoring our commitment to human rights, we seek to prevent and mitigate adverse human rights impacts in our global operations as well as our workplace and remediate any such impact we may inadvertently cause or perpetuate.

Diversity requires careful leadership to avoid misunderstandings and conflicts and to take advantage of the full value of diversity. At AOP Health, we value and manage diversity through an inclusive environment, as we are convinced that it is critical in helping to drive innovation as well as employee engagement.

The variety in backgrounds, cultures, languages, and ideas of our employees helps us to maintain a competitive edge. AOP Health's inclusive culture means that we value the variety among our people and we actively work to create an environment where all employees can share new ideas and ways of thinking, working, and realizing our full potential.

We do not tolerate any form of discrimination or harassment in the workplace, our employees being subjected to offensive, abusive or other unwanted behavior at the workplace, violations of our employees' personal dignity or creating an intimidating, hostile or humiliating environment for employees. We strongly condemn any physical, sexual, psychological, verbal or any other form of harassment.

It is AOP Health's policy to ensure that the behavior of its employees does not discriminate against anyone on the grounds of gender, age, ethnicity, national origin, religion, disability, sexual orientation, citizenship, genetic information, their abilities, or any other relevant characteristic. These principles apply to all aspects of the employment relationship, such as hiring, assignment to specific departments or projects, promotion, compensation, discipline, and termination.



*AOP Health's inclusive culture means that we value the variety among our people, and we actively work to create an environment where all employees can share new ideas and ways of thinking, working, and realizing our full potential.*



**AOP Orphan Pharmaceuticals GmbH**  
**Member of the AOP Health Group**

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***Needs.***  
***Science.***  
***Trust.***

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