

**Code of Business
Conduct and Ethics
PrJSC “Pharmaceutical
firm “Darnitsa”**



WHAT THIS CODE IS AND WHAT IT IS FOR

The Code contains the principles, standards of conduct and business practices adopted by PrJSC "Pharmaceutical Firm "Darnitsa" (hereinafter – Darnitsa or the Company), which ensure fair and honest treatment of our team members, partners, customers, healthcare professionals, as well as compliance with the law and internal regulations of the Company.

Darnitsa employees and managers shall act legally, honestly, ethically and for the benefit of the Company when performing their duties on its behalf. The Code will help to timely identify situations that do not comply with the ethical principles of Darnitsa. All Darnitsa employees and managers shall familiarize themselves with the Code and complete training. Darnitsa implements and maintains a risk-oriented employee training programme.

Whom this code applies to

The provisions of the Code apply to all Darnitsa employees and managers, regardless of their position, responsibilities, experience and department.

We welcome and strive to ensure whenever possible that partners and counterparties operate in accordance with the provisions of this Code. If you engage third parties to work with Darnitsa, make sure that your business partner has a good reputation and shares the ethical standards of this Code.

Whom this Code applies to?

The provisions of the Code
apply to all Counterparties of
Darnitsa



Darnitsa is a company of movement and leadership. Our leadership is due not only to a wide range of products, modern equipment and innovative technologies in accordance with GMP standards, but also due to the professional work of our team #it'sDarnitsa.

Supplements and contradictions

Darnitsa's Code may be amended in accordance with the applicable law or supplemented at any time without prior notice.

The Code is a publicly available document that can be found in Darnitsa's corporate network and on the website at <https://www.darnitsa.ua/>.

If any part of the Code is contrary to the applicable law as a result of changes in the applicable law, only those sections of the Code that comply with applicable laws and regulations shall apply.

Decision making ethics

Only honest business can be sustainable. Actions of each of us can directly affect the reputation and financial position of the Company, which means that it is the responsible and conscious ethical conduct of each employee that ensures the sustainability of Darnitsa's business.

Decision making principles

The Code sets forth the basic principles of conduct and decision-making, but it is impossible to foresee every

situation that may arise.

If you are not sure what you should do, ask yourself the following questions:

- ✓ Is it legal?
- ✓ Is it honest and fair?
- ✓ Does it meet Darnitsa's interests?
- ✓ Does it comply with Company's rules?
- ✓ Do I have the authority to do that?
- ✓ Will I feel comfortable if information about my actions becomes known?

If the answer to at least one of the questions is "No", you should not do what you were going to do.

Responsibility of management

Darnitsa's management has an additional responsibility to create and maintain a working environment in which your team members know and understand their responsibilities, feel confident, and are free to express their concerns and listen carefully to such concerns and take appropriate actions.



If you have any questions about the subjects covered in this Code, or doubt whether the situation is regulated by the Code or whether it is a violation of this Code, you should report this situation through channels communications specified in the Code.



Darnitsa does not allow unacceptable conduct both to and by employees and managers. Additional information on this subject is provided in the internal labour regulations.

Comfortable working conditions

Darnitsa strives to provide decent and safe working conditions. Our ethical imperative includes observance of human rights, creation of a productive atmosphere in the team, proper labour protection, provision of safety and psychological well-being of employees.

Pursuant to the Code, Darnitsa employees and managers shall do their best to create a favourable working environment in which everyone has the opportunity to unleash their full potential and be free from humiliation, intimidation, prejudice and discrimination of any kind.

Resolution of conflict of interest and other business practices

We cannot allow personal interests, such as personal relations with a customer, supplier, healthcare professional, competitor, business partner or other Darnitsa employee, to have an actual impact on our employees' ability to make fair and objective decisions when working in the company or to create the appearance of such effect.

Furthermore, Darnitsa has developed and maintains the principles of responsible giving and receiving gifts and business hospitality, as well as established criteria for their

acceptability. Darnitsa does not allow unfair use of gifts, for example, for the purpose of obtaining improper advantage.

Protection of assets of Darnitsa and third parties

Every employee shall protect assets, including material and intellectual property, confidential information, personal data from theft, damage, misuse and improper disposal. This responsibility shall also apply to assets entrusted to us by third parties.

- ✓ Any transfer of state secrets or other confidential information shall comply with all the required security procedures.
- ✓ Employees and managers shall use Darnitsa's confidential information only for business purposes and shall always store and dispose of such information in accordance with the requirements of the information security procedures.
- ✓ For the purpose of work, Darnitsa can provide you with access to the personal data of customers, employees, business partners, contractors, etc. This data requires particularly careful and responsible treatment and strict adherence to personal data processing policies: protecting such data is an area of equal priority to business leadership.

Not every conflict of interest is a problem or violation, but if it is not properly reported and resolved, it can have negative consequences for the employee, manager and Darnitsa itself. The best rule for any conflict of interest situation is to "refrain" and "disclose": where it is impossible to avoid participating in an event or activity creating a conflict of interest, report it and refrain from participating in the relevant decisions until the conflict is resolved.

Always remember that improper use or disclosure of such information, even within Darnitsa, can seriously damage the reputation of the Company, its customers, business partners and the professional community.

Immediately report any actual or probable incident or misuse of Darnitsa's assets through the violation reporting channels available to you.

RESPONSIBLE BUSINESS

- ✓ Intellectual property is one of Darnitsa's most valuable assets. We protect the intellectual property created by us and respect the intellectual property of other market players.

Fair commercial practices

Darnitsa builds long-term relations with customers by providing high-quality and safe products. No message from customers shall stay unanswered.

Darnitsa uses fair means of product promotion that prevent perceiving them as unethical or capable of harming customers, partners or third parties.

We do not gain a competitive advantage by using illegal and unethical methods, including through conspiracies and corrupt practices. Darnitsa employees and managers shall not discuss prices or enter into any formal or informal agreements with any competitor regarding prices, discounts, terms of business or market segments and channels in which the Company competes if the purpose or outcome of such discussion or agreement is contrary to the applicable antitrust law.





COMPLIANCE

Prohibition of any form of corruption and bribery

Employees and persons acting in the name or on behalf of the Company, both independently and through intermediaries, are prohibited by Darnitsa to offer, promise, make, approve, demand or accept any illegal payments or other improper benefits of any kind from any state officials and private persons, healthcare professionals in order to obtain or maintain or manage business, or to ensure other improper advantages in the course of their operation. Transactions implying potential corruption risks (including gifts, representation expenses, interactions with healthcare professionals or state officials or state organizations, sponsorship and charity activities, etc.), due to the risk of being able to influence business decisions, shall be made taking into account Darnitsa's internal compliance controls

Accounting and disclosure of information

Information disclosure.
Darnitsa strives to ensure that the accounts, accounting records

Employees should remember that any expression of their subjective opinion on social media or other public resources is interpreted by the public as the official position of the Company. In view of the above, Darnitsa recommends refraining from participating in discussions of topics that are prohibited from commenting in the public domain and/or may damage the Company's reputation and capitalization.

Darnitsa employees and managers shall comply with the laws applicable to the Company, regardless of the place of operation.

We strive to be open and active in our communications. When disclosing information, we are guided by the principles of maintaining a reasonable balance between information transparency and ensuring the commercial interests of the Company.



Darnitsa does not make any payments to simplify formalities and does not participate in political activities, including funding political parties and candidates for positions in state or local self-government bodies.

and financial statements are kept with a proper level of details, properly reflect Company's transactions in accordance with applicable law and internal control system. Each of us should remember that accurate accounting is important not only because it is required by regulators, but also because it helps maintain the Company's competitiveness on the market. Business information you provide shall always be accurate, timely, complete, fair and clear. In Darnitsa, any forgery of documents and distortion of the true nature of any transactions are prohibited. We fully comply with the requirements of the law and regulators regarding the disclosure of information. We ensure the transparency of our operation, openly interact with various stakeholders and regularly publish complete, accurate, timely and clear information of both financial and non-financial nature, which is necessary for stakeholders to make an investment or other decisions, get a complete and objective representation of the Company's activities. Darnitsa's brand and reputation are among our most

valuable assets, and the Company's position in the market largely depends on their protection and promotion. Darnitsa has a determined list of authorized persons publicly representing the Company

Use of insider information

In the course of work, each employee can learn important information about Darnitsa or other organizations before this information becomes public. The use of such insider information for personal benefit of an employee or third parties violates applicable law and is unacceptable in Darnitsa.

Information about the financial performance of the Company before it is publicly disclosed is considered insider information, and its use, even for a personal purpose, will be a violation.

RESPONSIBLE LEADERSHIP FOR SUSTAINABLE DEVELOPMENT



Responsibility for decisions

We recognize that the innovations we use to increase business efficiency and customer satisfaction are global factor that brings about not only new business opportunities but also risks for Darnitsa. Therefore, Darnitsa tries to adhere to the principles of sustainable development: conducts business ethically, assumes responsibility for the consequences of decisions and its operation, as well as for the impact of such consequences on society.

Environmental protection

In our work, we support the principle of environmental efficiency, we strive to minimize the impact of Darnitsa's operation on the environment.

Pharmacovigilance and responsibility for product quality

We continuously improve our production processes and upgrade our technological capacities with the use of advanced innovative technologies, ensuring compliance with all regulatory requirements in Ukraine and international standards.

We strictly regulate all production processes by standard operating procedures (SOP), which describe in detail all the tasks and mechanisms of product safety control in accordance with the established legal requirements. This provides effective controls ensuring that any problem related to quality standards is quickly identified and eliminated.

In our work, we support the principle of environmental efficiency, we strive to minimize the impact of Darnitsa's operation on the environment.

People's health and lives are our top priority.



What is Pharmacovigilance?

The Company is constantly improving by making constant investments in the quality management system and improvement of production technologies:

- ✓ implements modern GMP requirements and all necessary regulatory standards;
- ✓ develops the intellectual potential of its employees and introduces a knowledge management system;
- ✓ introduces modern innovative technologies;
- ✓ automates and robotises production processes and control systems;
- ✓ maintains constant dialogue and cooperation with scientists, pharmacists and doctors, i.e. all those who take care of physical and spiritual health of the nation.

People's health and lives are our top priority. Therefore, we produce high-quality medicines. However, there are no completely safe medicinal products. Each medicinal product, regardless of its origin or structure of the constituent substances, can have adverse reactions. Some of them are identified at the stage of preclinical and clinical trials. This process continues when the medicinal product is registered and marketed. This process is continuous. The pharmacovigilance system in our Company is aimed at monitoring the safety of medicinal products and their efficacy throughout the product life cycle. According to the World Health Organization (WHO), pharmacovigilance is a scientific activity aimed at identifying, collecting, evaluating, studying and preventing adverse reactions and other problems related to safety and efficacy of medicinal products. Pharmacovigilance is the control of the safety of medicinal products.





DARNITSA

Experience proven
in 16 countries worldwide

VIOLATION REPORTING



#it'sDarnitsa

Company of movement and leadership

#it'sDarnitsa

Darnitsa ensures an independent and comprehensive consideration of all reports regarding violations of requirements of this Code



Darnitsa maintains a culture in which problems can be reported through establishing an open and trusting dialogue with employees at all levels.

Feedback

If you have any information or suspicions about a possible violation of this Code, Company's regulations or legislation, do not keep silence!

Darnitsa has developed and maintains special communication channels for employees and managers, as well as third parties who want to report violations. You can choose the one that suits you best:

- ✓ contact your immediate supervisor or, if the report concerns the actions of your immediate supervisor, the senior manager;
- ✓ contact the compliance officer (in any form);
- ✓ write an e-mail to Hotline address: compliance.officer@darnitsa.ua.

Any person who has violated this Code may be subject to sanctions up to dismissal and/or termination of contracts in accordance with the provisions thereof and applicable law.

Prohibition of retaliation

Darnitsa ensures an independent and comprehensive review of all reports and protects those who have properly and honestly reported problems and violations, facilitated investigations, and refused to engage in activities contrary to the principles or requirements of this Code.

If you believe that retaliation has been taken against you after reporting a problem or violation, please contact Single Hotline or compliance function (compliance.officer@darnitsa.ua).



Darnitsa strives to be an open and honest Company. It is impossible to describe all the ethical scenarios we may face. Instead, we rely on common sense, awareness and responsibility of everyone to maintain high standards of ethics for ourselves and our Company. We expect that all Darnitsa employees and managers, counterparties and any participants in our work processes will be guided by both the language and the spirit of the Code.