



PRJSC “PHARMACEUTICAL FIRM “DARNYTSIA” CODE OF BUSINESS CONDUCT AND ETHICS

MESSAGE FROM THE GENERAL DIRECTOR OF DARNYTSIA, PRJSC



Dear colleagues!

The Darnytsia Code of Business Conduct and Ethics (hereinafter referred to as the Code) is a collection of the most important rules of conduct and business principles adopted by our team.

Darnytsia is a leading company. Our leadership is achieved not only by a wide range of products, modern equipment and innovative technologies that meet the standards of Good Manufacturing Practice (GMP), but also by the professional work of our team. By creating high-quality medicinal products, communicating within the company and outside, each of us confirms every day with our own decisions and work results that Darnytsia is a compliant company.

The success strategies of our large organization are subject to changes. However, what remains unchanged is that we at Darnytsia constantly adhere to responsible business practices and the principle of zero tolerance for any violations of the rules of business conduct and ethics.

Our company's activities are based on ethics, conscientious business conduct, a conscious and responsible attitude to one's own resources, proactivity and openness, the desire to do more and better at every point of contact with a consumer, patient, colleague or partner. Devotion to these principles is the key to success and competitive advantage of Darnytsia in the long term.

I personally and our entire team will make maximum efforts to preserve the chosen vector of movement of Darnytsia.

Sincerely,

Andrii Obrizan

INTRODUCTION

WHAT IS THE CODE AND WHY IT IS NECESSARY?

The Code contains the principles, standards of conduct and business practices adopted by PrJSC “Pharmaceutical Firm “Darnytsia” (hereinafter – Darnytsia, or the company), which guarantee honest and fair treatment of our team members, partners, consumers, health care workers, as well as compliance with legislation and internal regulatory documents of the company.

Darnytsia employees and managers, who perform their duties on behalf of the company, must act legally, honestly, ethically and in the best interests of the company. The Code will help to recognize in a timely manner the situations that do not correspond to the ethical principles of Darnytsia. All employees and managers of Darnytsia must read the Code and undergo training. Darnytsia implements and maintains a risk-oriented employee training program.



OUR VALUES



CONSCIOUS RESPONSIBILITY IS WHAT WE CHOOSE

We choose to make decisions and act for the long-term success of the company. We are aware of the influence of everyone on the results of the entire team, therefore we are guided by the principle “Do it as you would for yourself”.

At the same time, we are ready to admit our own mistakes, learn from them and correct them, gaining experience.



CURIOSITY IS WHAT WE CHOOSE

We learn every day, challenge established beliefs, try new ideas. To do this, we create a safe space for research and implement the best solutions. All these changes, however small, accumulate, turning into transformative and powerful gains.

As a result, this culture allows us to quickly and successfully adapt to a changing environment and manage uncertainties.



HUMANENESS IS WHAT WE CHOOSE

We believe that Darnytsia is what it is because of the people who have worked in the past, make up the current team and will join us in the future. We treat everyone as a unique individual, respond sensitively to the needs of others, value equal rights and different points of view, invest in people's development as an integral part of the company's success.

We see charity as a strategic contribution to the well-being of society. We integrate our efforts into comprehensive solutions aimed at strengthening the health of the nation, sustainable development initiatives and ethical business conduct.



SUSTAINABLE PARTNERSHIP IS WHAT WE CHOOSE

We create an atmosphere of cooperation, where the parties are interested in mutual success; we choose not short-term profit, but long-term welfare. In our work, we attract each other's strengths; we work together, because we have left behind the hierarchical and functional limitations of the past.

Our collaboration strategy goes beyond organizational boundaries – we build ecosystems outward and form strategic alliances to jointly implement our goals, overcome challenges and expand opportunities.

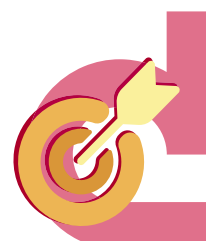
OUR VALUES



INSPIRATIONAL LEADERSHIP IS WHAT WE CHOOSE

We form a clear and convincing vision of the future. We trust teams to make decisions, to experiment on the way to success, because the leadership of the company is formed through the primacy of everyone in their respective fields.

By our own example, we demonstrate our commitment to doing what is right, not what is more convenient. We create an environment in which everyone feels heard and valued. We recognize individual achievements and celebrate joint victories.



THE THIRST FOR SUCCESS IS WHAT WE CHOOSE

We constantly strive to achieve and exceed goals, proactively seek opportunities and set new benchmarks. We remain determined in the face of obstacles and persistently go towards the goal.

A healthy spirit of competition drives us to implement new technologies and innovative processes in a dynamic environment. Sincere enthusiasm and dedication to work energize us and inspire us to make maximum efforts at work.

Every project, every initiative, every decision have passed through the filter of our values. We are proud that our reputation is a reflection of our unwavering commitment to honesty and transparency.



TO WHOM THE CODE APPLIES ON AMENDMENT PROCEDURE AND CONTRADICTIONS



The provisions of the Code apply to all employees and managers of Darnytsia, regardless of their position, duties, length of service and division.

! We welcome and strive in all possible cases to ensure that partners and counterparties conduct their activities in accordance with the norms established in this Code. If you engage third parties to work with Darnytsia, make sure that the business partner has a good reputation and shares the ethical norms of the Code.

Question: Do employees of Darnytsia have to comply with all the norms set forth in the Code of Business Conduct and Ethics?

Answer: Yes, employees of Darnytsia must comply with all norms set forth in the Code of Business Conduct and Ethics. This means that they must be aware of the requirements of the Code and apply its principles in their daily work. Failure to comply with the established rules and principles may lead to various forms of disciplinary measures, including termination of the employment contract.

ON AMENDMENT PROCEDURE AND CONTRADICTIONS

The Darnytsia Code may be amended in accordance with current legislation or supplemented at any time without prior notice.

The Code is a publicly available document; you can access and read it in the corporate network of Darnytsia and on the website <https://www.darnytsia.ua/>.

If, as a result of changes to the applicable legislation, any part of the Code will conflict with the applicable legislation, then only those sections of the Code that comply with the applicable laws and regulations will apply.

ETHICS OF DECISION-MAKING

PRINCIPLES OF DECISION-MAKING RESPONSIBILITY OF MANAGERS

Only honest business is sustainable. The actions of each of us can directly affect the reputation and financial condition of the company, which means that it is the responsible and conscious ethical behavior of each employee that guarantees the sustainability of Darnytsia's business.

The Code establishes basic principles of behavior and decision-making, but it is impossible to predict every situation that may arise.

If you do not know how to act, ask yourself the following questions:

- ✓ Is this legal?
- ✓ Is it fair and just?
- ✓ Does this correspond to the interests of Darnytsia?
- ✓ Does this comply with our corporate policies?
- ✓ Am I acting within my authority?
- ✓ Will I be able to be proud of this act in public?

If your answer to at least one of these questions is "No", then this is a clear marker to refrain from what you were going to do.

! If you have questions about topics covered by the Code, are unsure whether a situation is governed by the Code or is a violation of the Code, you should discuss the situation with your immediate or senior manager, or send your questions to compliance.officer@darnytsia.ua.

RESPONSIBILITY OF MANAGERS

Darnytsia managers bear an additional responsibility for creating and maintaining such a working environment in which members of your team know and understand their responsibilities, feel confident and can freely express their concerns, as well as listen carefully to such concerns and take appropriate measures.

We believe that leadership is not only about achieving goals, but also about the way to achieve them, which should be based on the principles of responsibility and high ethical standards.

RESPONSIBLE BUSINESS CONDUCT

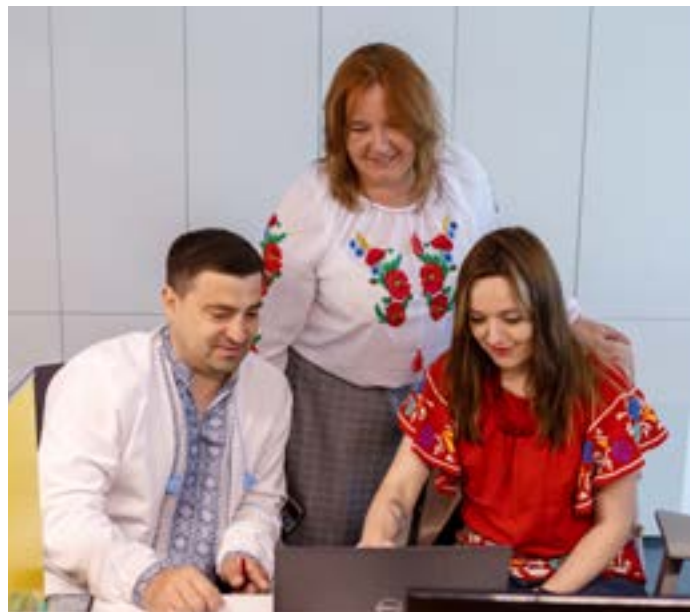
COMFORTABLE WORKING CONDITIONS

SETTLEMENT OF CONFLICTS OF INTEREST AND OTHER BUSINESS PRACTICES

Darnytsia strives to provide decent and safe working conditions.

Our ethical imperative: respect for human rights, creation of a productive atmosphere in the team, proper labor protection, safety and psychological well-being of employees.

According to the Code, Darnytsia managers and other employees must do everything possible to create an auspicious working environment in which everyone has the opportunity to fully develop their potential and be free from humiliation, intimidation, prejudice and discrimination of any kind.



Darnytsia does not allow unacceptable behavior both towards employees and managers, and on their part. Additional information on this topic is disclosed in the internal labor regulations.

SETTLEMENT OF CONFLICTS OF INTEREST AND OTHER BUSINESS PRACTICES

We cannot allow personal interests, such as personal relationships with a consumer, supplier, healthcare professional, competitor, business partner or other employee of Darnytsia, to have a material impact on our employees' ability to make fair and objective decisions in the course of their work in the company or even let it look as if such influence exists.

Not every conflict of interest is a problem or a violation, but if not properly disclosed and resolved, it can have negative consequences for employee, manager, and Darnytsia herself. The best rule of thumb for any conflict of interest situation is to “abstain” and “disclose”: If it is impossible to avoid participating in an event or activity that creates a conflict of interest, disclose it and refrain from participating in responsible decisions until the conflict is resolved.

RESPONSIBLE BUSINESS CONDUCT

SETTLEMENT OF CONFLICTS OF INTEREST AND OTHER BUSINESS PRACTICES

PROTECTION OF ASSETS OF DARNYTSIA AND THIRD PARTIES

In addition, Darnytsia has developed and supports the principles of responsible giving and receiving of gifts and signs of business hospitality, as well as established criteria for their acceptability. Darnytsia does not allow unfair use of gifts, for example, for the purpose of obtaining an unlawful benefit.

Question: My relative, like me, is an employee of Darnytsia, but works in another structural unit of the company. Is there a conflict of interest?

Answer: Such a situation is a potential conflict of interest. You are required to disclose information in accordance with the Conflict of Interest Management Policy.

Question: A company in which I or my relatives are co-founders is a supplier of Darnytsia. Would such a situation be considered a conflict of interest?

Answer: Yes, if you can make decisions regarding interaction with this company within the limits of your official duties.

Question: My wife is an employee of Darnytsia's competitor company. What should I do?

Answer: In this case, you must disclose information about the conflict of interest in the form and in the manner established by the Conflict of Interest Management Policy.

PROTECTION OF ASSETS OF DARNYTSIA AND THIRD PARTIES

Each employee is responsible for protecting assets, including physical and intellectual property, confidential information and personal data, from theft, damage, misuse, and improper disposal. This liability also applies to assets entrusted to us by third parties.

RESPONSIBLE BUSINESS CONDUCT

PROTECTION OF ASSETS OF DARNYTSIA AND THIRD PARTIES

- Any transfer of state secrets or other confidential information must comply with all necessary security procedures.
- Employees and managers use Darnytsia's confidential information only for business purposes and must always store and dispose of such information in accordance with the requirements of the information security mode.
- For work purposes, Darnytsia can give you access to personal data of employees or third parties. This data requires particularly careful and responsible handling and strict adherence to policies related to the processing of personal data: their protection is as much a priority as business leadership.
- Intellectual property is one of Darnytsia's most valuable assets. We protect the intellectual property objects created by us and respect the intellectual property of other market participants.

! Always remember that the misuse or disclosure of such information, even within Darnytsia, can seriously damage the reputation of the company, its customers, business partners and the professional community. Please, immediately report any actual or suspected incident or misuse of Darnytsia assets through the whistleblowing channels available to you.

Sending work files to a personal email address may seem like a simple solution, but doing so can open the door to potential threats. A better option would be to use corporate tools for remote access that guarantee security and control over data.

In case of doubt or uncertainty about the process of accessing corporate resources, you can always ask for support from the IT department or directly from your manager.

Question: My colleague, while on a business trip, asked me to send some presentations for work to his personal email. May I send them from my work email address? After all, it is necessary for work.

Answer: If your colleague, while on a business trip, asks you to send work presentations to his personal email, it is important to stop and think about this decision. Remember that even the most innocent actions can unwittingly put the privacy and security of corporate information at risk.

RESPONSIBLE BUSINESS CONDUCT

FAIR COMMERCIAL PRACTICES

Darnytsia builds long-term relationships with consumers by providing high-quality and safe products. No consumer message should go unanswered.

Darnytsia uses conscientious methods of promoting products that eliminate the possibility of being perceived as unethical or capable of harming consumers, partners or third parties.

! We do not gain competitive advantage through illegal and unethical means, including collusion and corrupt practices. We comply with all laws governing our marketing activities. These laws prohibit the use of unfair methods of competition, dishonest and fraudulent techniques in commercial activities.



COMPLIANCE WITH LEGISLATION

PROHIBITION OF ANY FORM OF CORRUPTION AND BRIBERY

Employees and managers of Darnytsia must comply with the laws applicable to the company, regardless of the location of their activities.

Question: An employee of Darnytsia often goes on business trips abroad. An employee knows that ideas about what is considered a norm in business are different everywhere. What is accepted and considered polite in one country may be considered a bribe in another. What considerations should a Darnytsia employee be guided by?

Answer: An employee of Darnytsia has no right to make monetary rewards or provide material benefits for the purpose of obtaining a commercial advantage in illegal manner; he is obliged to comply with the norms of the Darnytsia Anti-Corruption Legislation Compliance Policy.

PROHIBITION OF ANY FORM OF CORRUPTION AND BRIBERY

Employees and persons acting on behalf of or in the interests of the company are prohibited by Darnytsia from offering, promising, implementing, approving, demanding or accepting, either independently or through intermediaries, any illegal payments and other improper benefits of any kind from / to any public and private persons, health care workers for the purpose of obtaining or maintaining business or managing it, or in order to arrange other unlawful benefit during the performance of their activities.

Darnytsia does not make payments in order to simplify any formalities and does not participate in political activities, including financing parties or candidates for state or local government.

Transactions that carry potential corruption risks (including gifts, representative expenses, interaction with health care workers or with government officials or government organizations, sponsorships and charities, etc.), considering the risk of the possibility of influencing any business decisions, are made taking into account Darnytsia's internal compliance controls.

COMPLIANCE WITH LEGISLATION

ACCOUNTING AND DISCLOSURE OF INFORMATION

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

DISCLOSURE OF INFORMATION

Darnytsia strives to ensure that accounting reports, accounts and financial statements are kept with due detail, properly reflect the company's operations in accordance with applicable law and internal control systems. Each of us needs to remember that accurate reporting is important not only because it is required by regulatory authorities, but also because this data helps to keep the company competitive in the market. The business information provided by you must always be accurate, timely, complete, fair and understandable.

Falsification of documents, distortion of the true nature of any transactions is prohibited in Darnytsia. We fully comply with the requirements of legislation and regulators regarding disclosure of information.

We ensure the transparency of our activities, openly interact with various interested parties and regularly publish complete, reliable, timely and understandable information of both financial and non-financial nature, which is necessary for interested parties to make investment or other decisions, and to get a complete and objective picture of activities of our company.

COMPLIANCE WITH LEGISLATION

ACCOUNTING AND DISCLOSURE OF INFORMATION USE OF INSIDER INFORMATION

PUBLIC COMMUNICATIONS:

Darnytsia'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.

In Darnytsia, a circle of authorized persons publicly representing the company has been determined.

! We emphasize the importance of each employee's personal responsibility for maintaining our corporate reputation, so employees should remember that any expression of their subjective opinion in social media or other public resources is interpreted by the public as the official position of the company. In this regard, Darnytsia recommends refraining from participating in discussions on topics, commenting on which is prohibited in the public field and (or) may harm the company's reputation and capitalization.

USE OF INSIDER INFORMATION

In the course of their work, each employee may learn important information about Darnytsia or other organizations even before this information becomes public.

Using such insider information for personal gain of such an employee or any third parties violates applicable laws and is unacceptable at Darnytsia.

Information about the company's financial performance, before it has been publicly disclosed, is considered insider information, and its use, even for personal purposes, is a violation.

RESPONSIBLE LEADERSHIP FOR SUSTAINABLE DEVELOPMENT

RESPONSIBILITY FOR DECISIONS ENVIRONMENTAL PROTECTION

RESPONSIBILITY FOR DECISIONS

We recognize that the innovations we use to improve business efficiency and consumer satisfaction are a global factor that not only opens up new business opportunities, but also creates risks for Darnytsia. Therefore, Darnytsia adheres to the principles of sustainable development: conducts business in ethical manner, takes responsibility for the consequences of its decisions and activities, as well as for the impact of these consequences on society.

ENVIRONMENTAL PROTECTION

In our work, we support the principle of ecological efficiency; we strive to minimize the impact of Darnytsia's activities on the environment.



PHARMACOVIGILANCE AND RESPONSIBILITY FOR PRODUCT QUALITY



We continuously improve our production processes and modernize our technological facilities using the most modern innovative technologies, ensuring compliance with all Ukrainian regulatory requirements and international standards.

We strictly regulate all production processes with Standard Operating Procedures (SOPs), which describe in detail all tasks and mechanisms for drug safety control in accordance with legally established norms. This provides effective controls to ensure that any problem related to quality standards is quickly identified and remedied.

The company is constantly improving, making constant investments in the quality management system and improving production technologies:

- implements modern GMP requirements and all necessary regulatory standards;
- develops the intellectual potential of employees and implements a knowledge management system;
- introduces modern innovative technologies;
- carries out automation, robotization and digitization of production processes and control systems;
- maintains a constant dialogue and cooperates with scientists, pharmacists and doctors – all those who care about the physical and spiritual health of the nation.

People's health and life is our main priority. We create quality medicines, but any medicine can have side effects. Detection of these effects begins at the stage of clinical trials, continues throughout the registration process and becomes most active after the drug enters the market. Our pharmacovigilance system ensures continuous monitoring of the safety and effectiveness of medicines at all stages of their creation and use.

PHARMACOVIGILANCE AND RESPONSIBILITY FOR PRODUCT QUALITY



Pharmacovigilance is a key component of protecting Darnytsia's reputation and it is conducted exclusively within the frame of ethical norms.

Question.

While reading an article in a medical journal, I find that one of the paragraphs describes that a patient who took some Darnytsia medicine developed nausea and decreased blood pressure. What should I do with this information?

Answer.

You must inform the pharmacovigilance service of Darnytsia about this case within 24 hours from the moment you learned about it.

Question.

A pharmacist calls me and complains that the color of Darnytsia tablets has changed and does not correspond to the description in the instructions for medical use provided in the package. According to him/her, no one took these tablets. Should I report this to the pharmacovigilance service?

Answer.

No. This issue is not a pharmacovigilance issue. You must report this case to the Darnytsia Quality Control Service by providing the information to the Quality Control Officer.

NOTICES OF VIOLATIONS

FEEDBACK

PROHIBITION OF HARASSMENT

Darnytsia maintains a culture where concerns can be reported, establishing an open and trusting dialogue with employees at all levels.

FEEDBACK

If you have any information or suspicions about a possible violation of the provisions of the Code, company regulations or legislation – do not keep silence!

Darnytsia has developed and maintains special notification channels for employees and managers, as well as third parties wishing to report violations. You can choose the one that is convenient for you:

- **contact your direct manager or, in case if your report concerns the actions of your direct manager, contact a senior manager;**
- **contact the compliance manager (in any form);**
- **send a message to Unified Hotline e-mail address: compliance.officer@darnytsia.ua**

Any person who has violated the provisions of the Code may be subject to measures of influence up to dismissal and (or) termination of contracts in accordance with their provisions and applicable legislation.

PROHIBITION OF HARASSMENT

Darnytsia ensures an independent and comprehensive review of all reports, protecting those who properly and conscientiously reported problems and violations, assisted in investigations, and refused to participate in activities contrary to the principles or requirements of the Code.

If you believe that such actions have been taken against you after reporting a problem or violation, please contact the Unified Hotline or the compliance unit (compliance.officer@darnytsia.ua).

FINAL PROVISIONS

Darnytsia strives to be an open and conscientious company. It is impossible to describe all the ethical scenarios we may encounter. Instead, we rely on everyone's common sense, conscience and responsibility to maintain high ethical standards for ourselves and our company. We expect that all employees and managers of Darnytsia, contractors and any participants in our work processes will be guided by both the letter of the law and the spirit of the Code.

