



CODE OF CONDUCT COMPLIANCE AT AMINO FOR LAWFUL AND ETHICAL BEHAVIOUR

1. Foreword by the management

Dear colleagues,

Lawful and ethically correct behaviour from management to individual employees ('compliance') is one of the prerequisites for our success as a company. Ensuring compliance is therefore very important to us and is our obligation.

This Code of Conduct contains the rules on what this obligation means in detail and how we intend to fulfil it. The Code of Conduct is available to every employee and is given to every new employee. This is because everyone should be familiar with these rules and contribute with conviction to their implementation. Precisely because we also attach great importance to each individual employee taking responsibility for their own actions, we must give them guidance on how to fulfil this responsibility.

As the management, we are fully committed to compliance, i.e. adherence to applicable law and ethically correct behaviour, including the principles contained in our Code of Conduct. However, we are all responsible for ensuring that the rules of our Code of Conduct are known and followed. Please take the time to read the Code of Conduct carefully. If you have any questions, please speak to your managers or our Compliance Officer. And please express your concerns if something does not seem right to you!

By complying with the rules of the Code of Conduct, we all contribute to maintaining our reputation as a trustworthy partner. This is how we will continue to be successful in the future.

Yours sincerely

Dr. Lutz Thomas
Managing Director

Kai-Philipp Thomas
Authorised officer

Dr. Jörn Oetken
Authorised officer

Dr. Peter Versteegen
Compliance-Officer

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For reasons of easier readability, the masculine form is used throughout. Corresponding terms apply to both men and women in the interests of equal treatment.

2. Fundamentals

Our success depends on acting with integrity. This means doing the right thing, even beyond legal requirements. At AMINO, acting responsibly and sustainably is an integral part of our culture and our daily business.

2.1. To whom does the Code of Conduct apply?

The Code of Conduct applies to all AMINO employees. All employees are expected to familiarise themselves with the content of this Code of Conduct and ensure that they act in accordance with it.

The members of management and executives have a role model function with regard to compliance with the Code of Conduct. They will work towards compliance in their area of responsibility.

2.2. How is the Code of Conduct to be used?

The Code of Conduct forms the basis for ensuring that we at AMINO comply with all laws and other applicable regulations and act in an ethically responsible manner. In addition, AMINO has introduced a series of internal standard operating procedures (SOPs), company agreements and work instructions. These contain further details and procedures that we must adhere to.

All employees are strongly encouraged to speak up and ask for advice if necessary. We take reports seriously and treat them confidentially. We will investigate offences and take remedial action where necessary.

If you have any doubts about the appropriateness of an action, please contact your direct manager, your department head or our Compliance Officer at any time.

2.3. Responsibility of management and employees

Compliance is an integral management task at AMINO, both for the management and for the executives.

Each and every one of us shall, in his or her area of responsibility,

- promote a culture of integrity and mutual respect
- understand this Code of Conduct
- act in accordance with the standards set out in this Code of Conduct and the company policies and procedures that apply in the area in which we work
- report violations
- Never retaliate against anyone who reports a good faith concern about a violation of the Code of Conduct, our principles or policies.

3. Common values

Our actions and our corporate culture are guided by our values of performance, integrity, respect, responsibility, sustainability and communication. Each value is concretised in this Code of Conduct through guiding principles and short texts.

3.1. Performance

We know our goals, achieve them efficiently and allow ourselves to be measured by results.

Only those who set themselves goals can find the way to them (Lao-Tse): What sounds obvious can quickly get lost in the hectic pace of everyday working life. It is therefore important that we set ourselves clear goals and measure ourselves by how efficiently we achieve them.

Performance is work per time, the slowest step determines success or failure.

In the interests of our internal and external customers, we strive for the highest quality and best service. GMP and FSSC are our obligation; every employee contributes to product quality.

Optimum quality and service have many dimensions, including the greatest possible care and professionalism in the interests of our customers. This means that not only external but also internal contacts can be customers.

We combine our personal strengths to create a first-class team performance.

Every employee is called upon to make a contribution. Every opinion counts.

We work together to continuously improve.

Every employee is prepared to think outside the box and go the extra mile.

3.2. Integrity

We are honest and make our actions transparent.

Our aim is to be honest even when it is difficult for us personally. For example, if we have made a mistake, we want to admit it openly to our colleagues so that we can correct it together and avoid it in the future.

Openness also means passing on information in full so that others can assess our actions and know where they stand.

We act lawfully and in accordance with the interests and guidelines of the company.

We comply with all relevant rules and regulations laid down by law and by the company. Business decisions must never be driven by private interests and relationships.

We are reliable, honour agreements and keep our word.

Our aim is to act as a reliable partner in all situations. We want to reliably support our colleagues, employees, customers and suppliers as we have promised them.

We handle sensitive information confidentially.

A company's confidential information can cause great damage in the wrong hands. We take particular care to ensure that sensitive documents and conversations are identified as such and handled accordingly. If in doubt, it is better to double-check whether a piece of information is confidential than not enough.

3.3. Respect

We treat each other with respect and stand up for each other.

We respect the dignity and personality of every employee. Our dealings with each other are characterised by mutual respect, fairness, team spirit, professionalism and openness. Managers act as role models and prove themselves to be competent contacts, especially in conflict situations.

We treat our customers and suppliers with kindness and respect. At the same time, we always endeavour to support our customers in every respect.

It can help to keep asking yourself the question: 'Do I treat others the way I would like them to treat me?'

'It's not my job' is not an option when I am asked for support!

3.4. Responsibility

We take individual responsibility, seek challenges and take the initiative.

Challenges often appear in the form of 'problems' in everyday working life. We can either try to work around them or do our best to overcome them. Even if the first option often seems easier at first, we can only really develop if we actively tackle challenges. When someone gives us responsibility, this is always a sign of appreciation. And those who seek out and overcome challenges not only advance themselves, but ultimately also their own department and the company as a whole.

Our aim is to make decisions with comprehensibly documented preparation and to conclude agreements that we would make again.

We look beyond our own area of work and enjoy finding solutions together.

In everyday working life, the search for new ideas or solutions often means not stopping at the boundaries of your own department. Our colleagues have diverse potential. We should utilise this potential to be inspired by new perspectives and to find new solutions that we might not have come up with on our own.

3.5. Communication

We communicate openly with each other, seek dialogue, share our knowledge and trust each other. Confidential information must be protected from unauthorised use.

The knowledge and expertise of our employees is our company's most important asset. However, it can only be fully realised if we see ourselves as a genuine community in which every employee is willing to share their knowledge and experience with their colleagues.

The endeavour to keep all colleagues involved in a task or project up to date on the current status not only facilitates trusting and constructive cooperation - it also increases the likelihood of a successful completion of the task or project. And if you always endeavour to really listen to your colleagues in conversation, you create the best conditions for a trusting working relationship.

We are aware that communication is not a one-way street: even if every employee is responsible for keeping their colleagues and, in particular, those responsible for other areas, appropriately informed, every employee is also responsible for obtaining the necessary information.

3.6. Sustainability

AMINO is committed to economically, socially and environmentally responsible corporate governance and takes responsibility for its actions.

We find ways to reduce energy consumption, greenhouse gas emissions and environmental impact and improve health and safety at work while maintaining the high quality standards of our products.

This is why AMINO is committed to upholding ethical, social and environmental principles in its own business operations and in its relationships with employees, business partners and other stakeholders. All business activities are based on the values of the free democratic constitution, human rights and other fundamental rights as well as the obligations to act derived from these. We are also committed to the values of the ETI Base Code. The ETI Base Code is therefore an integral part of our Code of Conduct.

All dimensions of sustainable management are firmly anchored in AMINO's corporate strategy. All managers and employees contribute to achieving the corporate and sustainability goals that have been set.

4. Compliance principles in the workplace

4.1. Data protection

Personal data is processed as part of AMINO's activities. Personal data is processed exclusively within the framework of the relevant laws, contractual provisions and internal regulations. The data protection guidelines for the protection of personal data and AMINO's data protection manual must be observed as part of the activities.

4.2. Occupational safety

As a pharmaceutical company, we are not only concerned about the health of the patients in whose medicines our active ingredients are used, but also about the health of our own employees. A safe, healthy and productive workplace is therefore essential for us.

We have instructions to protect our employees from potential hazards in the workplace.

As a company and as employees, we want to contribute to creating a safe workplace and behave safely ourselves, which includes the following:

We carry out our work in a safe, competent and professional manner.
We comply with all work instructions relating to occupational safety.
We familiarise ourselves with the applicable safety regulations.

If we have concerns about occupational safety, we discuss these with our manager or the employee appointed by the management for occupational safety.

4.3. Working environment

I take responsibility for my area of work and act independently and responsibly within it. However, I also hand over responsibility to my colleagues and trust them to act independently and responsibly.

Clean workplace

- I sort out and remove everything that is not necessary from my workplace; cupboards are also sorted out and tidied.
- I put all my work equipment in a tidy condition and ready to hand. This puts an end to tedious searching - especially for my colleagues.
- I always keep my workplace and my work equipment clean and tidy, and tools and machines that I have worked with are cleaned again after use.
- I maintain cleanliness in the long term by creating a standard and setting up and adhering to cleaning schedules.
- I show self-discipline by making regular cleaning and tidying up part of my daily work - after a while, this becomes automatic and therefore habitual.

Internal communication

- I maintain my Outlook conscientiously.
- When I distribute information, I make sure that the recipient receives and understands the information.
- I only distribute information within the company to relevant people and do not copy as many colleagues as possible
- When I receive information, I have a duty to respond.
- I deal with enquiries and tasks on time.
- I assign tasks and requests with a completion date.
- I keep my company mobile phone ready for use.

External communication

- Documents sent to external parties must always have two signatures (at least one authorised).
- I follow up with the recipient of my message if there is no response.
- I activate my out-of-office note before I am absent and make sure that my named deputy is present during the specified period.
- I deal with enquiries on time.

Orders / Invoices

- Every employee may obtain quotations and send a written purchase requisition to Purchasing.
- Every purchase order requires the approval of the management, usually in the form of the budget; deviations from this require the authorisation of the management.
- Orders are only placed in writing via Purchasing.
- Invoices are checked by two people (arithmetically by the accounting department and technically by the specialist department/ordering employee).
- Invoices are approved by an employee with bank authorisation.

External companies

- External companies must receive the security leaflet before visiting AMINO.
- Parking spaces are available for external companies in the AMINO car park. Parking on the premises is prohibited. If material needs to be unloaded, external companies may drive onto the site for a short time.
- Employees of external companies will be met at the entrance. Entering the site unaccompanied is prohibited. If necessary, a work safety briefing must be carried out on site.

Behaviour in meetings

- An agenda or meeting objective is communicated in advance for every meeting.
- Every meeting starts on time, even if not everyone is there.
- I turn up to meetings on time and well prepared.
- If I am unable to attend a meeting, I inform the meeting organiser immediately.
- I mute my mobile phone during meetings, unless this is not possible due to operational requirements.
- Meetings are minuted and appropriate minutes are distributed. Where possible, the minutes are available the next working day.
- The camera must be switched on for video conferences.

Personal hygiene

- I know that observing personal hygiene is one of the principles of responsible handling of pharmaceutical products and I comply with the hygiene regulations.
- If just one employee violates the hygiene rules and potentially spreads germs in production as a result, these are - unsuspectingly - picked up and spread by the other employees. Personal hygiene includes personal hygiene and hygiene in the workplace.
- I am aware that personal hygiene starts at home. It also includes changing work clothes regularly.

Company property

- No employee may use company property (e.g. equipment, tools, inventories, raw materials, vehicles, office supplies, documents, files, data carriers) or company employees for private purposes.
- Company property may not be removed from the premises of AMINO without written authorisation from the management. This does not apply to the use of notebooks for home office use.
- Data, programmes or documents may not be copied or removed from the company without permission.
- The use of telephones, computers and the Internet for private purposes is only permitted with the consent of the company.
- The use of e-mail for private purposes is not permitted.
- The company's property must be treated with care. Damage must be avoided and reported immediately in the event of damage.

Confidentiality

- Company and business secrets as well as confidential documents that employees receive in the course of their work - including through affiliated companies - must be kept secret.
- They may not pass them on to external third parties or other employees unless they are involved with the confidential information due to their duties and are obliged to maintain confidentiality.

Safeguarding and documentation

Employees are obliged to secure their work equipment as far as possible and to document their work results in a comprehensible manner.

This includes in particular:

- Protecting documents and data from unauthorised access,
- Desks, cupboards and offices containing sensitive data must be kept locked, provided they can be locked,
- secure IT facilities with passwords.

- not to store files on my PC, but on the server, SharePoint, Teams or OneDrive, as files are regularly backed up there.
- Copy documents and records for business purposes only,
- to keep complete, clear and comprehensible records and files in order to ensure representation.

It must also be ensured that:

- Transactions relating to bookkeeping and accounting are fully and correctly documented and posted,
- business books and associated documents fully reflect all business transactions and correctly show the company's assets,
- letters and items labelled 'personal' are only opened by the addressee.

4.4. Shared responsibility for AMINO's reputation

AMINO's public image is largely determined by the behaviour and appearance of its employees. Every employee is therefore required to consider the impact of their actions on AMINO's reputation when performing their duties. When expressing private opinions in public, employees should not refer to their function at AMINO. This also applies to statements made on social media platforms.

4.5. Equal opportunities and mutual respect

By signing the 'Diversity Charter', AMINO is committed to equal opportunities and diversity. No one is disadvantaged because of their gender and gender identity, age, physical and mental abilities, nationality and ethical origin, religion and ideology, sexual orientation and social background. All employees are expected to respect the dignity, privacy and personal rights of each individual in their working environment. Discrimination, harassment and offence are not tolerated.

5. Compliance principles in dealing with third parties

Our reputation as a reliable business partner must not be jeopardised by bribery and other forms of corruption. We comply with the highest standards of integrity, applicable laws and our internal rules for dealing with third parties.

5.1. Fair competition

AMINO employees are committed to fair competition. Horizontal competition agreements, i.e. agreements or concerted practices between competitors that prevent, restrict or distort competition, are prohibited. Vertical competition agreements, for example between suppliers and customers, which aim to restrict them in the organisation of prices and terms and conditions with third parties, are also prohibited.

5.2. Conflicts of interest - corruption

Our employees separate their private interests from those of the company. Business decisions must not be guided by private interests and relationships.

Employees may not demand, accept, offer or grant any personal advantage in connection with business activities that could even create the impression of influence.

Gifts and invitations must always be reported to the line manager. The form for accepting gifts and invitations must be used for this purpose.

5.3. Donations

AMINO recognises its social responsibility and is generally prepared to support charitable causes through donations. Donations to political parties, political foundations and other political organisations are excluded.

6. Compliance organisation at AMINO

6.1. Compliance-Officer

The Compliance Officer is responsible for implementing the Code of Conduct at AMINO. He is also responsible for reviewing the efficiency of the Code of Conduct. The Compliance Officer reports professionally to the Management Board.

The Compliance Officer reports to the Management Board on every reported indication of a breach of rules at AMINO and coordinates measures, investigation results and any other necessary consequences.

AMINO's Compliance Officer is named in the internally communicated organisation chart and published on AMINO's website.

Compliance Officer
An der Zucker-Raffinerie 9
38373 Frellstedt
Tel.: 05355/9100-50
Email: hinweise@amino.de

The Compliance Officer can be contacted at any time in person, in writing, by telephone or by email about potential grievances, misconduct or breaches of the Code of Conduct. The Compliance Officer follows up the information and investigates the underlying facts. If necessary, further steps must be agreed with the management.

6.2. Whistleblower system

Compliance with the law and internal regulations is a top priority at AMINO. After all, damage to the company, employees, business partners and customers can only be averted if rules and standards are adhered to. Misconduct must therefore be recognised at an early stage, dealt with and remedied immediately. This requires the attention of all employees and their willingness to point out possible serious breaches of rules if there are concrete indications. We also value

corresponding information from business partners, customers and other third parties.

AMINO provides the following reporting channels for this purpose:

Email: hinweise@amino.de
Telefon: 05355/9100-50
Postweg: personal/confidential
AMINO GmbH
Compliance Officer
Whistleblower system
An der Zucker-Raffinerie 9
38373 Frellstedt

The whistleblower system is intended to disclose serious breaches of regulations and the law. These are violations that seriously affect or could seriously affect the interests of AMINO. The question of the applicability of the whistleblower system can also be agreed with the whistleblower reporting centre.

The whistleblower system is an important element of good corporate governance. As part of a fair and transparent procedure, the whistleblower system protects the whistleblower, the persons concerned and the company. A standardised and structured process and the confidential and professional handling of reports by internal experts form the foundation of the system.

The protection of whistleblowers is an important part of our reporting system. AMINO does not tolerate attempts at intimidation, reprisals or other discrimination or penalisation of the whistleblower and will take action against them.

6.3. Implementation of the supply chain due diligence obligations

Even if AMINO falls below the size criteria for the mandatory application of the Supply Chain Due Diligence Act, AMINO fulfils its corporate due diligence obligations to comply with human rights within the supply chain.

AMINO also requires its business partners to commit to compliance with ethical, social and environmental principles. With the Supplier Code of Conduct, AMINO sets clear requirements for business partners for responsible procurement, who must ensure occupational health and safety for their employees. This also includes the prohibition of child labour, forced labour and other involuntary labour at AMINO's business partners. AMINO undertakes not to purchase services and products that do not comply with these standards. If such a violation only becomes apparent in the course of a supply and service relationship, AMINO will terminate this business relationship.

As part of the implementation of the requirements of the supply chain due diligence obligations, a human rights officer monitors the risk management for

compliance with the due diligence obligations relating to human rights and environmental protection issues. The Human Rights Officer, who is also the Compliance Officer, reports directly and regularly to the Management Board.

The Human Rights Officer can be contacted at any time in person, in writing, by telephone or by email regarding potential grievances, misconduct or violations of human and environmental rights. He receives information on violations, coordinates the results of investigations, remedial and preventive measures and any other necessary consequences - if necessary also together with the Management Board.

6.4. Questions about the Code of Conduct

The Code of Conduct describes the principles of legally and ethically appropriate behaviour. In the event of problems of interpretation and questions regarding the application of the Code of Conduct, employees should contact their line manager or the Compliance Officer, who is also available as an advisor in all compliance matters. The Compliance Officer and every employee is obliged to treat compliance matters confidentially.

6.5. Reporting violations of the Code of Conduct

All employees are required to inform their line manager or the Compliance Officer of any violations of the Code of Conduct.

Sanctions against the complainant based on their report are prohibited. This also applies if the content of a report proves to be inaccurate, provided that the employee has acted in good faith.

6.6. Consequences of violations of the Code of Conduct

Violations of the provisions of this Code of Conduct may result in disciplinary measures, sanctions under labour law including termination of employment and further legal action.