






AOP HEALTH

Code of Conduct

AOP HEALTH

A Message from the CEOs

At AOP Health, patients are at the heart of everything we do. We focus on improving patient outcomes by developing and providing innovative therapies for rare and complex diseases. We work across countries and cultures to address unmet medical needs with dedication, scientific excellence, and deep respect for patients. Doing this well takes entrepreneurial drive and the courage to pursue opportunities that make a meaningful difference.

This Code of Conduct outlines the principles that guide our work globally. It defines how we engage with external stakeholders and how we collaborate internally, fostering a culture of respect, inclusion, and open dialogue.

Our approach is guided by three principles: Needs. Science. Trust.

Trust is fundamental to our success. This depends on how we work, the decisions we make, and how we treat others. Each of us contributes to maintaining this trust, by acting with integrity, transparency, and accountability – and complying with applicable laws and standards.

We are committed to living our Code of Conduct in our daily work, which continues to strengthen our culture and our role as a reliable partner.

Thank you for your commitment and support.



Bernhard Nachbaur LL.M. (WU)
CEO | AOP Orphan Pharmaceuticals GmbH – Member of the AOP Health Group



Dr. Martin Steinhart
CEO | AOP Orphan Pharmaceuticals GmbH – Member of the AOP Health Group

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Scope

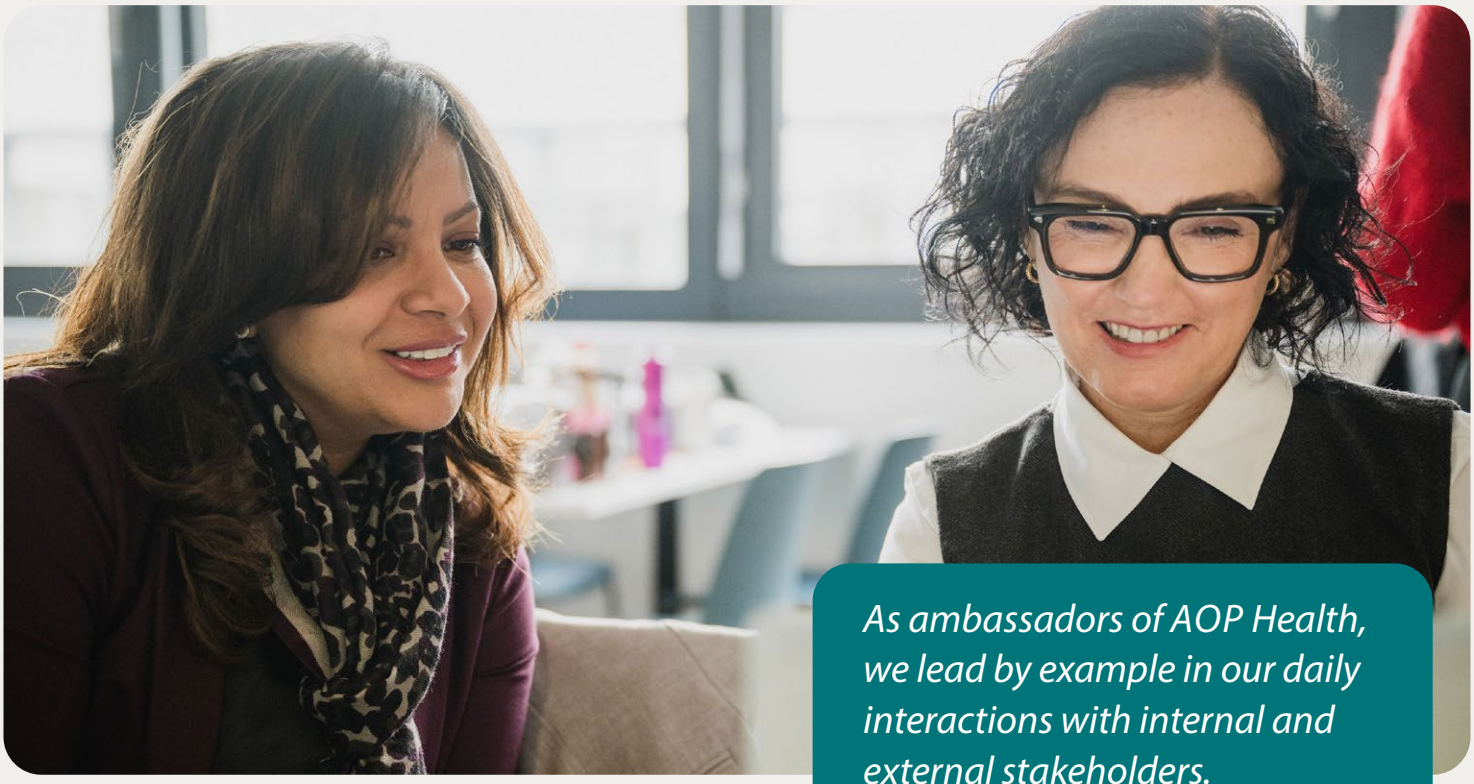
This Code of Conduct applies to all AOP Health legal entities and representative offices worldwide (AOP Health Group) and to every employee, regardless of role, seniority or location, and sets a common standard that unites us across countries and functions.

Compliance with this Code of Conduct is **every employee's responsibility.** All employees are expected to understand and comply with the Code of Conduct in its spirit, principles, and content. When a situation is new or the right path is not clear, we seek guidance early from our line managers, AOP Health's Human Resources Department and/or Legal Affairs Department.

We expect **third parties** acting for or on behalf of AOP Health, including business partners, distributors, consultants, and service providers, to uphold the same principles and meet the standards relevant to their work.

Where the Code of Conduct is not followed, we address the matter promptly, fairly and consistently. The aim is to protect patients and the company, correct the issue and learn from it.

As ambassadors of AOP Health, we lead by example in our interactions with colleagues, patients, patient organizations, healthcare professionals, business partners, authorities, and communities. Leaders have a particular responsibility to set clear expectations, give teams room to act and must create a culture where questions, different views, and concerns can be raised without hesitation and retaliation.



As ambassadors of AOP Health, we lead by example in our daily interactions with internal and external stakeholders.

AOP Health Purpose Statement

Needs. Our work is guided by the needs of patients, healthcare 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.

Needs.
Science.
Trust.

Our 5-A Values

Agile: We are focused, creative, and flexible in finding optimal solutions to get the job done.

Ambitious: We carry a mindset that everything is possible.

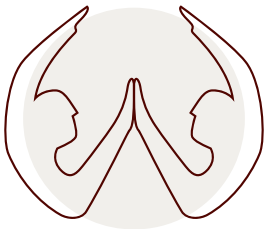
Aligned: We share, engage and collaborate towards a common goal.

Accountable: We take ownership and responsibility for outcomes.

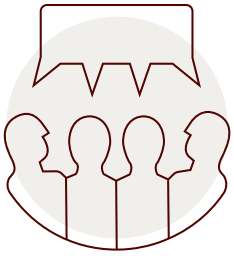
Appreciative: We reinforce what is positive and give feedforward.



Agile



Ambitious



Aligned



Accountable



Appreciative

Patients & Patient Organizations

Patients are at the heart of everything we do. People living with rare and complex diseases are experts in their own experience. Listening to them and understanding their needs is essential to developing meaningful therapeutic solutions and improving standards of care.

Sustainable and respectful collaborations with patient organizations provide valuable insights across all therapeutic areas and throughout the entire lifecycle of our medicines. These collaborations help us better understand patient perspectives, improve disease awareness, and contribute to enhanced education and access to healthcare.

We engage with patients and patient organizations with openness, integrity, and respect. Our goal is to support improved patient outcomes, informed decision-making, and responsible disease awareness initiatives. All interactions are in line with applicable laws, regulations, industry codes, and AOP Health policies governing patient interaction.

When working with patient organizations, **we ensure that our activities are aligned with the respective organization's mission** and that their independence is protected. Any support provided, whether financial or non-financial, is transparent, appropriately documented and structured in a way that safeguards the patient organization's independence and autonomy.

By building relationships based on trust, mutual respect, and shared dedication, we improve patient care. Through responsible collaboration, we contribute to a healthcare environment where patient voices are heard and valued.



Healthcare Professionals and Healthcare Organizations

Collaboration with healthcare professionals ("HCPs") and healthcare organizations ("HCOs") is essential to advancing patient care. At AOP Health, we engage with HCPs to support research and development, enhance scientific understanding, and help ensure that patients receive effective and appropriate treatment.

Our interactions with HCPs and HCOs are grounded in **integrity, transparency, and respect for professional independence.** We recognize the important role HCPs and HCOs play in clinical research, medical education, and their contribution to the development of innovative therapies. Their expertise and insights are invaluable in addressing unmet medical needs.

We communicate about our products and services ethically and responsibly. Information for HCPs is accurate, balanced, evidence-based, and consistent with approved labeling and applicable regulations. Our objective is to support informed medical decision-making by providing accurate scientific and medical information where needed.

We enter into collaboration with HCPs and HCOs only for a clearly defined scientific, medical or business need. Compensation for services are agreed transparently, and fees are appropriate and reflect the fair market value. Collaboration is never used to reward or influence prescribing, purchasing, or recommendation decisions.

We do not expect, request or accept preferential treatment for our products and services arising from a relationship with an HCP or HCO. Medical decisions remain independent and are guided by the patients' needs.

We are committed to **ensuring scientific integrity** in our research and development activities, and we fully recognize the importance of HCPs and HCOs play in the development of new therapies.

We believe that supporting high-quality medical education contributes to better patient outcomes. AOP Health supports independent medical education and scientific congresses in accordance with applicable laws, regulations, and industry standards.



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

Public Authorities and Public Officials

Public authorities and public officials are key stakeholders in the healthcare ecosystem. They shape the regulatory, economic, and social frameworks that enable access to healthcare, protect patients, and support sustainable healthcare systems.

At AOP Health, we engage with public authorities and public officials in a **responsible, transparent, and constructive manner.** We believe that open dialogue with policy makers is an important element of good governance and contributes to a sustainable, equitable, and high-quality healthcare system. Our interactions are guided by integrity, accuracy, and respect for institutional independence and decision-making.

We may participate in public-private partnerships and initiatives or collaborative efforts that aim to improve the healthcare systems and expand access to innovative therapies.

We are dedicated to **developing and offering innovative therapies that improve and extend patients' lives,** and we contribute constructively to discussions affecting patients and access to innovative therapies for rare diseases.

We interact with public authorities and public officials in a transparent, professional, and respectful manner. Our **communications are accurate, honest, and consistent,** fostering trust and supporting informed decision-making.



Environmental Responsibility

At AOP Health, we recognize our responsibility to manage environmental, social and governance (ESG) impacts of our operations and value chain in a responsible and transparent manner. Climate change and environmental degradation are some of the defining global challenges of our time, and we are committed to contributing to sustainability solutions within the healthcare sector.

Our sustainability approach is guided by globally recognized frameworks and standards such as the **Paris Agreement, Greenhouse Gas (GHG) Protocol.** We continuously develop our sustainability management and reporting practices in line with evolving regulatory and industry expectations.

We set priorities through a structured and risk-based approach. This includes **identifying and prioritizing the most relevant environmental topics** for our business and focusing on our efforts where we can have the greatest impact.

Compliance with all applicable environmental, health and safety laws and regulations is our baseline. Across the countries in which we operate, we align our practices with European standards, including applicable reporting frameworks.

A significant part of our environmental footprint arises beyond our direct operations, particularly in our supply chain. We aim to strengthen our collaboration with business partners and **integrate environmental and sustainability criteria in our partnerships** and decision-making processes.

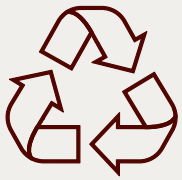
By integrating environmental responsibility into our daily business, we contribute to a more sustainable healthcare system while supporting long-term growth.



We integrate environmental and sustainability criteria in our partnerships and decision-making processes.

Responsible Resource Management

We take a structured and pragmatic approach to managing our environmental impact. We focus on areas where we can make a meaningful contribution today while continuously improving our data, processes and ambitions for the future.



We conduct our activities with the ambition to **prevent environmental harm and to continuously improve environmental performance** across all countries where we operate. We strive to reduce emissions into the air and continuously improve environmental performance at our sites, contributing to the right of communities to a clean, healthy, and sustainable environment. We respect water as a limited and essential resource and promote its responsible and effective use. We aim to reduce freshwater withdrawal and ensure appropriate wastewater treatment and discharge management.

Circular economy principles are promoted within our operations and supply chain, including efforts to gradually reduce reliance on non-renewable resources where scientifically and technically viable.

Waste is managed responsibly to ensure it does not pose risks to employees, communities, or the environment. **We seek to minimize waste generation and promote reuse and recycling** wherever this is compatible with pharmaceutical quality, patient safety, and regulatory standards.

We operate and maintain our technical equipment, production systems, and laboratory infrastructure in a manner that **optimizes efficiency, reduces material losses, and prevents unnecessary waste.**

We comply with applicable **environmental laws and international agreements** governing regulated substances and materials. In addition, we consider the impact of our activities on biodiversity and ecosystems and aim to avoid and minimize negative effects through responsible site management and supply chain engagement.

Accurate Records and Documentation

Good decisions depend on good information. Accurate, complete, and reliable records are substantial to our credibility, regulatory compliance, and long-term success.

"Records" are more than financial accounts. They include all **information created, processed, and maintained during our activities.** This includes, for example, research and laboratory data, clinical trial documentation, manufacturing and quality records, pharmacovigilance reports, environmental reports, and regulatory submissions.

Every employee who creates, reviews or approves records or other business information is accountable for its accuracy and completeness. All entries and reports reflect the true nature of the underlying transaction or activity. Information and records must never be falsified, manipulated, incomplete, or misleading. This includes, for example,

- deliberately delaying or omitting the recording of transactions;
- submitting inaccurate or misleading expense claims, time records or financial data;
- altering, fabricating or suppressing research result, test data, quality documentation, or regulatory information;
- creating side agreements or informal arrangements that are not properly documented.

We keep records complete, accurate, clear, timely, accessible, and maintained in accordance with applicable legal, regulatory and internal requirements. Strong documentation supports internal decisions, effective collaboration and learning. It is especially critical in research, development, manufacturing, quality, and safety reporting



Cooperations with Business Partners

Our values and standards are the foundation of our sustainable growth and long-term success. We view our business partners not merely as service providers, but as collaborators in our shared mission of improving patients' lives.

Our relationships with business partners are **built on fairness, transparency, and mutual respect.** In selecting and working with partners, who are guided by objective criteria such as integrity, high quality of products and services, availability, reliability, suitability, and innovation. Ethical conduct and sustainable practices are essential components of these considerations.

All employees uphold and promote the values and principles set out in this Code of Conduct. Third parties acting for or on behalf of AOP Health, such as external consultants, distributors, agents, suppliers, vendors, and other business partners, are expected to follow AOP Health's principles. This includes respecting human rights, providing safe working conditions, protecting the environment, rejecting child and forced labor, and preventing corruption.

Before a long-term or significant business relationship begins, **we conduct a risk-based due diligence to assess the integrity, reputation, qualifications, and credibility of potential partners.** This helps to ensure that we engage with organizations that meet our standards. Throughout the cooperation, we continuously align with our ethical and compliance requirements. Employees raise any concerns related to business partners with their line manager or the Legal Affairs Department.

We are available to our business partners for guidance regarding the application of the AOP Health Group Code of Conduct and related standards. Concerns about potential non-compliance can be addressed through appropriate AOP Health channels. If a business partner fails to comply with applicable laws, regulations, industry codes, contractual obligations, or recognized corporate social responsibility standards, we will seek appropriate remedial actions.



Our relationships with business partners are built on fairness, transparency, and mutual respect.

Confidentiality and Protection of Information

Innovation is in the focus of AOP Health. Our knowledge, research, data, and intellectual property are essential to developing innovative therapies that improve patients' lives. Protecting this information is a shared responsibility.



All employees safeguard AOP Health's confidential information and intellectual property, including patents, trademarks, copyrights, trade secrets, and other proprietary technologies, research and development data, clinical information, manufacturing processes, customer and employee records and know-how. Such information is handled with care and disclosed only to authorized persons with a legitimate need to know. This protection supports our competitiveness, our reputation, and our long-term success.

We apply the **same care to confidential information entrusted to us by healthcare professionals, business partners, and other stakeholders.** Information received in the context of collaborations, research activities, or commercial relationships is treated with the same level of care as our own data and used only for the agreed purposes.

Confidential or non-public information is never used for personal benefit or disclosed to unauthorized individuals, including friends or family members. Access to sensitive information gained through work must not be exploited for financial or other personal gain. Our employees are aware of and regularly trained on the importance of keeping information confidential.

We protect proprietary and confidential information of AOP Health, our stakeholders, and business partners unless disclosure is authorized by AOP Health, the disclosing party or is required by law. This obligation continues after employment or a contractual relationship ends.

Confidentiality and non-disclosure obligations are established through contractual arrangements and internal policies, and our employees receive guidance and regular training on their responsibilities.

Data Privacy & Data Protection

Compliance with data privacy is fundamental to trust. At AOP Health, we protect the personal data of our employees, patients, healthcare professionals, and business partners.

The **responsible handling of personal data** is an essential part of our daily work and a cornerstone of ethical and innovative health care. Many of our activities, including research, clinical development, pharmacovigilance and patient support, rely on careful and secure processing of sensitive information. We treat this responsibility with the utmost care. We collect and process personal data lawfully, fairly, transparently, and only for legitimate and defined purposes. We respect the rights and dignity of individuals and handle their data in a way that reflects the trust placed in AOP Health.

All personal data, meaning any information relating to an identified or identifiable individual, is processed in accordance with applicable data protection laws, including the **EU General Data Protection Regulation** (GDPR) and other applicable national and international requirements. Access to personal data is granted strictly on a need-to-know basis. Employees receive regular training and apply data protection principles and internal policies in everyday decisions.

Where required, we **provide clear information to individuals about how their data is collected, processed, used, and shared.** We build and implement appropriate technical and organizational safeguards into our processes and systems to protect personal data against unauthorized access, loss, misuse, alteration, or disclosure.

Personal data is shared with third parties only when there is a **legitimate business purpose and an appropriate legal basis.** In such cases, we ensure that confidentiality obligations and state of the art data protection measures are contractually secured. Where personal data is transferred across borders, including outside of the European Union, we take steps to ensure that an adequate level of data protection is maintained in accordance with applicable legal and technical standards.

By protecting personal data responsibly, we uphold individual rights, safeguard patient trust and reinforce the integrity of AOP Health.

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Conflicts of Interest

At AOP Health, we make decisions with integrity and in the best interest of patients, our business partners, communities and our company. Professional judgement is always guided by objectivity, fairness, and responsibility, not by personal interest.

A conflict of interest arises when personal interests, relationships, or external activities interfere, or appears to interfere with the ability to act in the best interest of AOP Health. Even the appearance of a potential conflict can undermine trust and should therefore be addressed with care.

Conflicts of interest may occur in various situations. For example, they can arise when family members or close friends are connected to a company that does business with AOP Health, or when personal relationships overlap with professional responsibilities. They may also arise from outside business activities, that affect or appear to affect independent decision-making.

Transparency is key to managing conflicts responsibly. Undisclosed conflicts of interest can damage trust and may result in corrective measures. Addressing potential conflicts early helps prevent misunderstandings, especially when a situation is unclear. We carefully consider potential conflicts of interest before making decisions.

We resolve any potential conflicts of interest in a transparent and open manner. In the event of an actual or potential conflict of interest, employees are expected to consult with their line manager and the Legal Affairs Department to find an appropriate solution.



Anti-Corruption & Anti-Bribery Laws



Integrity is fundamental to our mission. Corruption undermines trust in governments and businesses. It distorts fair competition, limits access to essential services and damages the credibility of institutions and companies alike. In healthcare, the consequences can directly affect patient care and public confidence. At AOP Health, we have zero tolerance for corruption and bribery.

Employees and business partners of AOP Health may never, directly, or indirectly, offer, promise, give, grant, request or accept any improper advantages to influence a business decision or secure an undue benefit. This applies to interactions with healthcare professionals, healthcare institutions, public officials, business partners, and private individuals.

Improper advantages may take many forms. They can include illegal discounts, bribes, kickbacks and facilitation payments, but also inappropriate gifts, hospitality, meals, entertainment, travel expenses or sham arrangements intended to improperly influence a decision.

We are mindful that not only actual misconduct, but also perception of misconduct, can harm trust. Therefore, we avoid any situation that could reasonably be understood as an attempt to influence decisions in an improper or unethical manner. We do not offer, provide, or promise anything of value (directly or indirectly) to obtain or retain business, secure regulatory approval or gain unfair advantage.

Applicable laws, regulations, industry codes, internal guidelines, and standard operating procedures ("SOPs") help us make confident decisions. We plan early, follow the relevant processes and record the business rationale accurately.

To ensure awareness and accountability, we provide regular mandatory training to employees on anti-corruption and anti-bribery requirements.

Anti-Trust Law & Fair Competition

At AOP Health, we believe that patients, healthcare systems and society as a whole benefit from fair and open competition. It challenges us to improve our science, move faster, sharpen our value, and deliver better solutions for patients.

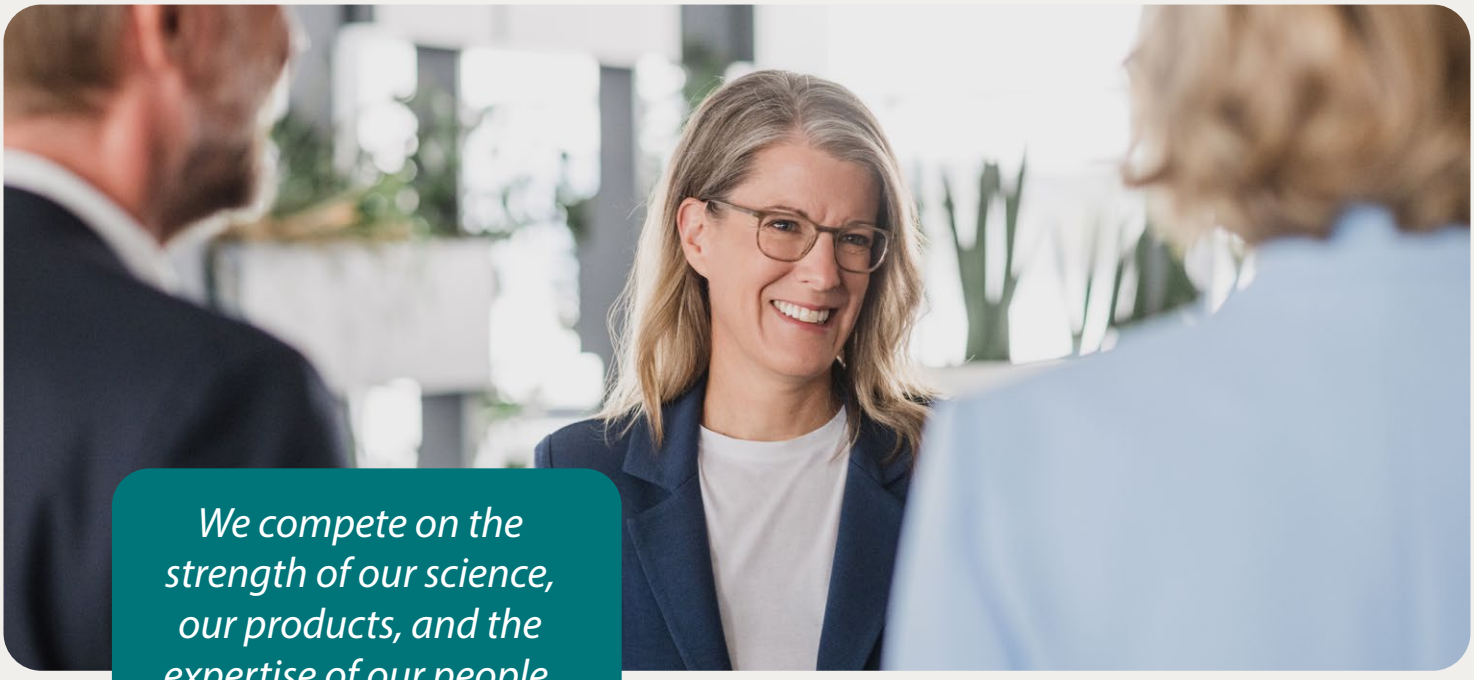
Anti-trust and competition laws **prohibit agreements or practices that prevent, restrict, or distort competition.** This includes, for example, agreements to fix prices, coordinate bids, allocate markets or customers, or otherwise manipulate competitive conditions.

We compete on the strength of our science, our products, and the expertise of our people. We conduct business fairly, transparently, and in full compliance with applicable laws and industry standards. Our success is earned through merit, never through improper coordination or unfair advantage.

We do not engage in unethical business practices such as deceptive marketing, misuse of confidential competitors or customer information, or the misappropriation of trade secrets.

We also expect our business partners to adhere to competition laws and to conduct themselves in a manner consistent with fair market practices.

Leaders at all levels promote awareness of competition law requirements and ensure that employees and third parties acting for or on behalf of AOP Health understand and comply with these principles.



Safety, Quality Standards and Good Practice



Patient safety and product quality are essential for AOP Health and our mission to deliver safe and innovative medicines and medical devices to patients. Every therapy we develop, manufacture and supply meet the highest quality standards of safety, efficacy, and quality. Patients, healthcare professionals, and regulators trust us to act responsibly, and we take that responsibility seriously.

We are committed to meeting or exceeding applicable customer and regulatory requirements across the entire lifecycle of our products and services, including research, development, procurement, manufacturing, packaging, testing, distribution, and maintenance. Quality means consistently delivering safe, effective, and reliable products and services on time and in full compliance with regulatory expectations.

Innovation drives our ambition to continuously improve our therapies and address unmet medical needs. **High quality standards are embedded in everything we do.** Quality is a serious commitment shared by all employees and business partners of AOP Health.

We maintain comprehensive quality assurance and quality control systems aligned to internationally recognized Good Practice (GxP), including Good Clinical Practice (GCP), Good Laboratory Practice (GLP), Good Manufacturing Practice (GMP), Good Pharmacovigilance Practice (GVP) and Good Distribution Practice (GDP). These frameworks guide our daily work and help ensure consistent compliance, reliability, and scientific accuracy. We expect equivalent commitment from suppliers and business partners.

Patient safety is our highest priority. The timely identification, documentation, and reporting of adverse events and product complaints are essential to safeguarding patients and maintaining regulatory demands. Employees are regularly trained to recognize and to report all adverse events and product complaints to the responsible departments. We never compromise quality or safety in anything we do. We comply with applicable health, safety, security, and environmental laws, as well as recognized corporate standards and best practices. We take all reasonable and appropriate measures to provide a safe, healthy, and secure working environment for our employees and partners.

Working at AOP Health

At AOP Health, we strive to create a work environment where everyone feels respected, heard, and empowered. Open communication is essential to our culture. We encourage the exchange of ideas and perspectives and value honest feedback and dialogue across all levels of the organization.

To c**ontinuously improve our organization,** we regularly invite employees to share feedback, including through anonymous surveys. Listening to our people helps us to identify opportunities for growth and ensures that our workplace reflects our 5-A values.

Our work is guided by AOP Health's mission, vision, and strategic priorities. We align resources, timelines, and responsibilities with our corporate priorities while remaining adaptable in a fast-changing healthcare environment. Collaboration across functions, regions, and departments is key to achieving shared goals.

We are committed to **supporting the personal and professional development of our employees.** Learning, growth, and continuous improvement are integral to our sustainable success as an innovative pharmaceutical company focusing on rare diseases.

Working at AOP Health means **contributing to a meaningful purpose.** Our mission aims to improve patients' lives by addressing unmet medical needs. Every role within AOP Health contributes to this overarching mission.

Where compatible with business and regulatory requirements, **we support flexible working models and modern ways of collaboration.** We promote an international, inclusive, and sustainable workplace that encourages teamwork, and shared success.








Diversity, Equality & Inclusion



Compliance with human rights and human dignity is fundamental to who we are at AOP Health. Across our global operations and workplaces, we are committed to preventing and mitigating adverse human rights impacts. Where impacts occur, we take responsibility and act to address them appropriately.

We believe that diversity strengthens us. Different perspectives, backgrounds, cultures, experiences, ways of working and thinking enrich our global organization and help us better understand the needs of patients and communities we serve. An inclusive environment drives innovation and fosters meaningful employee engagement.

At AOP Health, inclusion means that we value the variety among our people. We actively work to create an environment where all employees feel respected, valued, and empowered to share openly new ideas and thrive collaboration across functions, regions, and cultures.

Discrimination, harassment, or any other conduct that violates personal dignity have no place at AOP Health. This includes physical, sexual, psychological or verbal harassment and behavior that creates an intimidating, hostile or humiliating environment. Every employee at AOP Health has the right to work in a safe and respectful setting.

Employment decisions are based on merit, qualifications, performance, and business needs. We provide equal opportunity and do not discriminate based on gender, age, ethnicity, national origin, religion, disability, sexual orientation, citizenship, genetic information, or any other characteristic. These principles apply throughout the entire employment relationship, including recruitment, development opportunities, promotion, compensation, performance management, and termination.

Leaders foster an inclusive culture and act promptly and responsibly if concerns may arise. Each of us helps create a respectful and fair workplace with equal opportunity.

Compliance is Everyone's Responsibility



At AOP Health, responsible entrepreneurship and compliance belong together. Laws, regulations, industry codes and our internal standards provide guardrails within we can innovate, compete and grow with confidence. They protect patients, AOP Health's license to operate and the trust in what we do.

Compliance at AOP Health means acting responsibly, in line with our values, and established processes in every decision we make. Each employee uses sound judgement, takes ownership and makes decisions within their role. A responsible decision considers patient impact, scientific evidence, business opportunity, relevant risks, and our 5-A values.

Leaders set direction, clarify decisions and create space for responsible action. They lead by example, integrate compliance into daily operations and make sure their teams receive appropriate guidance and support. Legal, Compliance, Quality Management, Drug Safety, and Human Resources functions advice, but accountability rests with all of us.

Our aim is not to avoid every risk. Progress in rare and complex diseases require informed risk-taking. **We identify what could happen, assess potential benefits and consequences, involve the right expertise and put adequate safeguards in place.** When uncertainty remains, we seek guidance from the many experts working at AOP Health or external experts, if needed. Raising questions at an early stage helps to prevent potential issues.

Speaking up is equally important. When something does not feel right it is essential to protecting our integrity and maintaining trust at AOP Health. Employees raise concerns with their line manager or relevant functions, or use the Whistleblower Tool, which provides a secure, accessible and anonymous reporting channel. Reports made in good faith are taken seriously, handled professionally, and confidentially. Retaliation against anyone who raises concern responsibly is not tolerated. At the same time, misuse of reporting channels is unacceptable.

By acting with integrity, making informed decisions, taking responsible risk and speaking up when needed, we protect patients, support one another and strengthen AOP Health's compliance culture.

AOP HEALTH

Needs. Science. Trust.

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