

# CODE OF CONDUCT FOR BUSINESS PARTNERS

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## INTRODUCTION

JGL d.d. is the largest pharmaceutical company in Croatian ownership with a global reach and an innovative leader in the therapeutic areas of cold and flu, ophthalmology, and dermatology. Thanks to its continued investments in research and development, production facilities, and technology, it is now a leading manufacturer of sterile pharmaceutical forms in the EU.

JGL Group (hereinafter referred to as “JGL” or “the company”), comprising the parent company JGL d.d., its representative offices, and affiliated companies, is dedicated to improving people’s health and well-being, and is actively and continuously creating an innovative approach to new product development in key therapeutic areas for the global consumer.

### Company Purpose

“We help people sense the world around them in a better, richer and more confident way.  
Experience the scent of the Earth, see the world of possibilities, feel good in your skin!  
Sense the life.”

### Company Core Values

ACCOUNTABILITY – We promote a sense of personal accountability as we know that a company’s well-being leads to employee well-being.

RESPECT – We want every member of the organisation to feel respected and valued.

UNITY – We are building a global JGL community where we take care of each other.

SUSTAINABILITY – We create long-term value by caring for our social and natural environment.



## **Standards**

This Code of Conduct is based on globally recognised standards, including but not limited to: the UN Global Compact Principles, the International Labour Organization (ILO) Core Conventions, the Universal Declaration of Human Rights (UDHR), the United Nations Convention against Corruption (UNCAC), and the principles of the Pharmaceutical Supply Chain Initiative (PSCI).

## **PURPOSE**

The key principles we uphold in our relationships with business partners include compliance with legal and ethical standards, as well as adherence to standards of social responsibility, environmental protection and corporate governance, all with the highest degree of honesty and integrity. Our core values serve as guiding principles in all business activities, and we therefore carefully select partners who share these values and demonstrate the same level of commitment.

This Code of Conduct for Business Partners (hereinafter: the Code of Conduct) forms an integral part of all contracts concluded between JGL and its business partners, even when not explicitly stated in the agreement.

The purpose of this Code of Conduct is to establish a set of expectations and guidelines for ethical and responsible behaviour that business partners are expected to follow when working with JGL.

## **SCOPE AND APPLICABILITY**

This Code of Conduct for Business Partners applies to any external legal entity or organisation (third party) that provides goods, services or resources to our company, including suppliers, service providers, contractors, subcontractors and other business partners. The term “partners” in this document refers to all types of organisations that collaborate with our company.

## **OBLIGATIONS AND EXPECTATIONS OF BUSINESS PARTNERS**

### **Compliance**

All business partners must fully understand and comply with all applicable laws and regulations (international, national and local) governing their operations. This Code of Conduct does not override local laws, rules or regulations that partners are required to follow.

The successful implementation of this Code of Conduct depends on adherence by all parties in the supply chain. Therefore, business partners are also required to ensure that their own partners are informed about and comply with this Code of Conduct.

## Expectations

Partners are expected to:

- Carefully read and understand the principles of the Code of Conduct,
- Assess the alignment of their policies and practices with the Code of Conduct,
- Identify and address any shortcomings,
- Continually improve their business practices,
- Inform their business partners about the Code of Conduct.

# 1. Business Integrity and Ethical Conduct

JGL expects its business partners to operate responsibly and ethically, in line with the principles outlined below. These principles are fundamental to meeting expectations across all aspects of business conduct.

## Principles

### 1.1. Combating Bribery and Corruption

JGL business partners are expected to maintain zero tolerance for any form of corruption, bribery, or embezzlement, including the use of intermediaries for such actions. Partners must not, directly or indirectly, engage in or allow any corrupt or unethical practices, nor may they offer, promise, or give any benefit to individuals in the public or private sectors with the intent to influence decisions or gain unfair advantage.

### 1.2. Conflict of Interest

Business partners must avoid situations that could lead to actual or potential conflicts of interest in dealings with JGL.

A conflict of interest arises when personal interests or relationships (including family or friends) could affect objective business decisions.

Partners are required to immediately disclose any real or potential conflicts of interest, including (but not limited to):

- financial interests or shareholdings in competing or collaborating companies,
- personal relationships with JGL employees that may influence business decisions,
- any other circumstance that could conflict with the interests of JGL.

All such cases must be documented and reviewed prior to continuing cooperation.

### 1.3. Interactions with the Healthcare Community

Business partners must not engage with healthcare professionals (HCPs) or healthcare organisations (HCOs) in a way that exerts, or could be perceived to exert, undue influence. They must never offer any benefits as a reward for, or in exchange for, recommending, prescribing, dispensing, purchasing, supplying, selling, administering, referring, arranging, or ordering JGL's products, nor to encourage such actions in the future. In their interactions with the healthcare community – including HCPs, HCOs, patients and patient organisations – business partners must comply with conduct standards issued by relevant industry bodies, such as the European Federation of Pharmaceutical Industries and Associations (EFPIA), Medicines for Europe (MfE),

and the International Federation of Pharmaceutical Manufacturers and Associations (IFPMA). Business partners involved in the preparation of sales, advertising, promotional or marketing materials must ensure that all descriptions and claims used are truthful and compliant.

#### **1.4. Fair Competition and Insider Trading**

JGL's business partners must conduct their operations in accordance with the principles of fair competition and comply with all applicable competition and antitrust laws. Business partners must not engage in prohibited agreements with competitors or abuse any market position that could be considered dominant, nor may they take part in any other form of prohibited conduct.

Business partners must not use privileged (insider) information obtained through their dealings with our company for personal gain or the benefit of third parties. Insider information includes any material, non-public information that could influence investor decisions or affect the value of the securities of our company.

#### **1.5. Trade Secrets and Data Protection**

JGL's business partners are obliged to treat all of JGL's trade secrets as confidential and to use them only to the extent necessary and permissible, in a manner that prevents unauthorised disclosure. Business partners are required to sign a confidentiality agreement or accept contractual provisions that govern the handling of confidential information.

Information systems used by business partners that store confidential information or data belonging to JGL must be properly managed and protected against unauthorised access, use, disclosure, alteration or destruction.

#### **1.6. Intellectual Property**

Partners and their employees must protect JGL's tangible and intangible assets, particularly intellectual property.

#### **1.7. Clinical Trials, Research and Development**

In the conduct of clinical trials, business partners are expected to comply with international guidelines, applicable national and local regulations, recognised medical, scientific and ethical standards, and international quality and safety standards. All clinical trials must be carried out in accordance with global Good Clinical Practice (GCP) standards and must adhere to the highest medical, scientific, and ethical principles, as outlined in the Declaration of Helsinki.

#### **1.8. Anti-Money Laundering**

Business partners are expected to comply with all applicable laws and regulations on the prevention of money laundering. They are expected to have procedures in place to verify the identity of their clients and contracting parties, monitor and report any suspicious financial transactions, and implement and maintain an effective anti-money laundering programme to detect and prevent unlawful financial activities.

#### **1.9. Compliance with Trade Regulations**

JGL's business partners are required to fully comply with all applicable trade regulations, including but not limited to export and import laws, sanctions, embargoes, and controls on the transfer of goods, technology, and services.

Business Partners must:

- Ensure that their operations do not involve transactions or cooperation with individuals, organisations, or countries subject to international sanctions or restrictions;
- Obtain all necessary permits, licences, and approvals prior to the export or import of products, technology, or services related to our company;
- Maintain accurate and complete records of all relevant trade activities and provide access to such records upon request by our company or the competent authorities;
- Immediately notify our company of any situation that may constitute a breach of trade regulations or affect the fulfilment of contractual obligations.

#### **1.10. Marketing and Promotional Practices**

JGL's business partners must act truthfully and transparently in the promotion of products, in line with applicable regulations and industry codes.

All marketing and promotional materials and activities must comply with high ethical, medical, and scientific standards, and must adhere to all relevant laws and regulations. When working with healthcare professionals and patients, all partners must follow the applicable industry codes of conduct issued by the European Federation of Pharmaceutical Industries and Associations (EFPIA), Medicines for Europe (MfE), and the International Federation of Pharmaceutical Manufacturers & Associations (IFPMA).

#### **1.11. Responsible Use of Technology, Including Artificial Intelligence (AI)**

JGL's business partners must respect ethical principles in the development and use of technology, including artificial intelligence (AI). This includes ensuring that AI systems are developed and used in ways that respect human rights and avoid discrimination or bias. Particular attention must be paid to safeguarding privacy and the security of personal data, applying the highest standards of cybersecurity and transparency in data processing. AI systems must be clearly identifiable as such when interacting with people. All AI systems must fully comply with applicable laws and regulations, including national and international rules on data protection, safety, and accountability. In addition, it is important to follow internationally recognised principles and guidelines for the development and use of AI technologies, such as the OECD Principles on Artificial Intelligence, which emphasise transparency, accountability, safety, human oversight, and sustainable development. This promotes the responsible and ethical use of artificial intelligence for the benefit of society, with continuous monitoring and assessment of potential risks and impacts on individuals and communities.

#### **1.12. Financial and Business Records**

Partners must maintain accurate and complete financial and business records.

#### **1.13. Privacy and Data Protection**

Business partners may collect personal data only for legitimate business purposes and must do so lawfully, transparently, and securely. Such data may only be shared with individuals who are authorised to access it and must be protected in line with security policies and retained only for as long as necessary, with appropriate safeguards in place.

Business partners must ensure that any third parties with access to personal data protect it to the same standards.

They are also required to implement appropriate safeguards to protect data and information systems against unauthorised access, loss, misuse, or damage. Employees handling sensitive data must receive adequate training on cybersecurity measures.

#### 1.14. Animal Welfare

Animals must be treated with respect, and pain and distress should be minimised. Animal testing should only be conducted after considering the possibility of animal substitutes, reducing the number of animals used, or refining procedures to minimise discomfort. Alternatives must be used whenever they are scientifically justified and acceptable to regulatory authorities.

## 2. Human and Labour Rights

JGL's business partners are required to respect all internationally recognised human and labour rights, including those defined in the International Bill of Human Rights and the core conventions of the International Labour Organization (ILO). Workers must be treated with dignity and respect.

### Respect for Human Rights

JGL is committed to respecting internationally recognised human rights in its own operations and supply chain. We expect our business partners to share this commitment and to progressively establish reasonable processes to identify, prevent, and mitigate potential adverse impacts on human rights within their operations and, where applicable, their own supply chains.

We recognise that capacities and contexts vary among business partners, and that responsible business conduct is a process of continuous improvement. The same principles apply within our own organisation.

In this regard, we expect the following fundamental steps from our business partners:

- **Clear commitment** – to have a defined commitment to respecting human rights (e.g., through internal policies or a code of ethics) and to communicate these expectations within their organisation and to their partners;
- **Risk identification** – to conduct a basic assessment of potential human rights risks, focusing on areas where risks are highest, such as working conditions, forced labour, discrimination, and child labour, regardless of the partner's size or location;
- **Prevention and mitigation** – to take appropriate measures to prevent or reduce identified risks (e.g., employee training, monitoring of business partners, internal audits) and, where possible, involve relevant stakeholders in the identification and resolution of risks;
- **Monitoring and improvement** – to periodically review the effectiveness of measures taken and work towards continuous improvement, proportionate to the level of risk and available resources;
- **Responding to identified adverse impacts** – to take concrete steps to remedy situations when adverse impacts are found and to cooperate in good faith with relevant stakeholders, including providing access to effective grievance mechanisms that allow affected individuals to raise concerns;
- **Transparency and cooperation** – to provide relevant information upon request and to cooperate openly in cases of suspected serious human rights violations.

### Principles

#### 2.1. Non-Discrimination

Discrimination based on race, skin colour, age, pregnancy, gender, sexual orientation, gender identity, ethnic origin, disability, religion, political beliefs, trade union membership, marital status, or any other protected characteristic is strictly prohibited. JGL's business partners are



required to actively promote equal opportunities and foster an inclusive work environment where everyone feels respected and valued.

## **2.2. Fair Treatment**

Any form of workplace harassment is not tolerated, including but not limited to sexual harassment, harassment based on gender, gender identity, sexual orientation, marital status, race, national or social origin, religious or political beliefs, culture, age, physical ability, or any other behaviour deemed unacceptable within the social or business community.

## **2.3. Voluntary Employment**

Forced, compulsory, or slave labour is strictly prohibited, including forced overtime, prison labour, and human trafficking. No worker shall be required to pay for their job, nor shall their freedom of movement be restricted.

## **2.4. Child Labour and Young Workers**

JGL's business partners must ensure that the minimum employment age complies with the fundamental labour standards of the International Labour Organization (ILO). According to these standards, child labour is prohibited below the age of completion of compulsory schooling (under 15 years), or in exceptional cases, under 14 years. Where local law sets a higher minimum employment age or compulsory schooling age, the higher age applies.

When employing young workers, they must not be assigned tasks that are mentally, physically, socially, or morally hazardous, nor tasks that interfere with their education.

## **2.5. Salaries**

Workers must be compensated in accordance with applicable laws and contracts, including overtime and mandatory benefits, with clear and timely communication of the basis for their pay.

## **2.6. Working Hours**

JGL's business partners must comply with laws regarding working hours, overtime, breaks, and paid leave.

## **2.7. Freedom of Association**

JGL's business partners are obliged to respect workers' rights to freely associate, join trade unions, and engage in collective bargaining without fear of retaliation.

## 3. Health and Safety

The protection of employee health, workplace safety, environmental protection, and natural resource conservation are strategic priorities for our company. We expect the same commitment from our business partners — to ensure work environments that actively prevent risks to the health and safety of all workers, contractors, and other individuals. Business partners are required to comply with all occupational health and safety regulations in force in the countries where they operate, including all obligations arising from their role as employers.

### Principles

#### 3.1. Worker Health and Safety

Business Partners are required to:

- Design facilities and work processes free from known hazards that could cause injury, occupational illness, or death to employees and others;
- Conduct regular risk assessments for all work tasks and implement control measures based on the assessment results;
- Provide appropriate personal protective equipment and other necessary conditions (e.g., drinking water, sanitary facilities) for all workers and contractors;
- Inform and train workers about all potential risks and provide clear instructions for safe work, especially when handling hazardous substances.

JGL's business partners are required to systematically manage risks to the safety of employees and others by applying the hierarchy of controls. Risk management must follow this priority order:

1. Risk elimination – completely removing the hazard source, where feasible
2. Risk substitution – using less hazardous processes, substances, or work methods
3. Engineering controls – technical solutions that physically separate people from hazards
4. Administrative and organisational measures – changes in work methods, procedures, or schedules to reduce exposure
5. Use of personal protective equipment (PPE)– applying protective gear when risks cannot be eliminated or further reduced by other measures.

Major incidents and accidents must be analysed, documented, and communicated promptly. For higher-risk processes and facilities, partners must regularly conduct targeted risk assessments and take measures to prevent serious incidents such as chemical spills, fires, and explosions.

#### 3.2. Safe Equipment and Work Facilities

Partners are responsible for maintaining equipment, tools, facilities, and installations in a safe and proper condition, in accordance with project documentation for the facilities and the technical documentation provided by the manufacturers of machinery and equipment, to ensure the technical and organisational conditions necessary for safe operation.

#### 3.3. Worker Awareness and Training

Partners are required to:

- Ensure the availability of updated safety data sheets, procedures, and work instructions,
- Provide standard operating procedures for task execution,

- Deliver regular training to workers on safety procedures, handling of hazardous substances, and protective measures,
- Ensure all materials are available in a language understood by the workers,
- Inform workers of all circumstances and changes affecting their risk exposure.

### **3.4. Process Safety and Emergency Preparedness**

Partners are required to:

- Identify potential incident scenarios (e.g. chemical spills, explosions, fires, floods, earthquakes),
- Develop and implement plans for prevention, response, and mitigation,
- Conduct regular evacuation drills and train employees on how to act in incident situations.

### **3.5. Documentation, Monitoring, and Statistical Tracking in Occupational Health and Safety**

Partners are required to maintain and regularly update all documentation mandated by the legislation of the country in which they operate, including but not limited to:

- Risk assessments,
- Evacuation and rescue plans,
- Records of worker training in safe working practices,
- Records of workers' medical fitness where required for specific roles,
- Logs of occupational injuries, illnesses, and near misses,
- records of inspections and testing of work equipment, installations, and the working environment.

All documentation must be retained in accordance with applicable legal retention periods and made available upon request to competent authorities or JGL representatives in the event of audits, inspections, or reviews.

Partners are required to monitor and analyse the following:

- The number and types of occupational injuries,
- The number of reported hazardous situations and near misses,
- Internationally recognised safety indicators, such as the Lost Time Injury Frequency Rate (LTIFR), used to monitor and assess the effectiveness of occupational health and safety systems,
- The results of inspections and internal audits.

## 4. Environmental Protection

JGL expects its business partners to operate based on principles of efficiency and environmental responsibility. Business partners are expected to systematically manage and reduce their environmental impacts, taking into account, but not limited to, energy, water, waste, chemicals, air pollution, and biodiversity.

It is recommended that business partners consider setting measurable targets for reducing greenhouse gas emissions, energy and water consumption, as well as establishing mechanisms for monitoring and reporting on progress. The use of renewable energy sources is also encouraged where feasible.

In cases involving hazardous chemicals, business partners are required to carry out specific risk assessments and implement appropriate measures to prevent incidents such as chemical releases into the environment and/or explosions. Partners must operate in an environmentally responsible manner and use resources efficiently in order to reduce their environmental impact.

### Principles

#### 4.1. Compliance and Reporting

Business partners must comply with all applicable environmental regulations and regularly report on their compliance.

#### 4.2. Waste and Emissions Management

Business partners are required to manage waste, wastewater, and emissions responsibly and to prevent spills and releases of hazardous substances, including pharmaceutical compounds. Systems must be implemented to prevent and mitigate accidental discharges and harmful impacts on the local community.

Business partners are expected to continuously improve their sustainability performance, including reducing their environmental impact and promoting recycling. Ongoing monitoring and reduction of greenhouse gas emissions is also essential.

#### 4.3. Conflict Minerals

Business partners must ensure that products delivered to JGL do not contain metals derived from minerals or their derivatives originating from conflict-affected and high-risk areas that directly or indirectly finance or are used by armed groups, or that cause or contribute to human rights violations. Business partners are expected to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD DDG) and the EU Conflict Minerals Regulation.

## 5. Management System

JGL encourages its business partners to implement effective management systems and corporate governance structures to ensure compliance with applicable laws, regulations, and our Code of Conduct. Business partners are required to maintain systems for risk management, compliance, monitoring, and the continuous improvement of these systems.

### 5.1. Legal and Other Requirements

Business partners should identify and comply with all applicable international, national, and local laws and regulations, contractual obligations, and internationally recognised standards and conventions relevant to their operations. This includes, but is not limited to, the principles outlined in this Code of Conduct. Business partners are also expected to align their practices with generally accepted industry standards, obtain, maintain, and regularly update all required permits, certificates, licences, and registrations, and operate in full compliance with their terms at all times.

### 5.2. Risk Management and Business Continuity

Business partners are required to use systems for risk identification and management, ensure business continuity, continuous improvement, and compliance with all relevant principles.

### 5.3. Training and Competence

Business partners should inform all workers, including contract workers, about the principles of this Code of Conduct. It is expected that business partners have a training programme in place to equip management and employees with the knowledge and skills necessary to meet the expectations set out in this document. Partners must also ensure that management and employees have the required qualifications, resources, and authority to fulfil these expectations.

Business partners should ensure that, upon reasonable request by JGL, subcontractor workers participate in appropriate training related to the principles covered by this Code of Conduct. Such training programmes should be documented, repeated, and periodically updated.

### 5.4. Documentation

Business partners should maintain the documentation necessary to demonstrate compliance with these expectations and adherence to applicable regulations.

### 5.5. Selection and Monitoring of Business Partners

Business partners are expected to apply the principles set out in this document when selecting their own business partners. They should have systems in place to monitor the compliance of their partners and subcontractors.

### 5.6. Grievance Mechanisms

Business partners should have mechanisms in place for reporting irregularities without fear of retaliation against the whistleblower.

### **5.7. Continuous Improvement**

Business partners are expected to pursue continuous improvement by setting performance targets, implementing action plans, investigating incidents, and taking appropriate corrective measures to address deficiencies identified through internal and/or external assessments, inspections, and management reviews.

## **6. Implementation of the Code of Conduct**

### **6.1. Governance, Monitoring, and Adaptation**

JGL expects its business partners to establish and maintain appropriate management systems aligned with the principles set out in this Code of Conduct and to actively review, monitor and adjust their processes and operations to ensure ongoing compliance.

Business partners are also required to ensure that the principles contained in this Code are communicated to other stakeholders within their supply chain, including subcontractors. JGL encourages its business partners to regularly train their employees on the principles of this document – for example, through annual webinars on sustainable procurement and ethical business conduct.

### **6.2. Compliance Checks and Assessments**

JGL shall reserve the right to verify and monitor the compliance of business partners and their subcontractors with the provisions of this Code of Conduct. JGL or authorised third parties may visit the business partner's premises or request information and documentation regarding compliance with this Code. Business partners are expected to cooperate fully with any requests for information and investigations. With reasonable prior notice, business partners shall grant JGL access to verify compliance with this Code of Conduct.

In doing so, JGL will respect applicable requirements related to data protection, confidentiality, competition law, and labour regulations.

### **6.3. Breaches of the Code of Conduct and Consequences**

Business partners are required to promptly report to JGL in writing any identified risks or violations of the principles set out in the Code of Conduct and to take appropriate corrective actions to prevent, stop, or mitigate such breaches.

JGL may cooperate with the business partner to address these issues as quickly as possible. If the business partner fails to demonstrate willingness to implement corrective measures or if such measures prove ineffective, JGL reserves the right to terminate the business relationship, taking into account the specific circumstances and the interests of both parties.

#### 6.4. Ethics Line

Business partners are expected to report any suspected or actual violations of these Code of Conduct principles, applicable laws, or regulations. JGL guarantees protection from retaliation for those who report violations in good faith.

All reports are handled confidentially and forwarded to the appropriate company officials. Business partners who identify potential misconduct by JGL employees, representatives, subcontractors, or intermediaries must report it to JGL via email at [ethics@jglpharma.com](mailto:ethics@jglpharma.com) or by mail to: JADRAN - GALENSKI LABORATORIJ d.d., Svilno 20 / 51 000 Rijeka / Croatia.

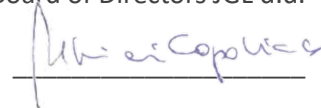
## 7. Amendments to the Code of Conduct

This Code of Conduct supersedes the Supplier Code of Conduct dated 20 March 2023.

JGL is committed to regularly reviewing and updating the Code of Conduct to reflect relevant changes in legislation, regulatory requirements, and industry standards, and will promptly inform its partners of any amendments.

Rijeka, 9<sup>th</sup> December 2025

Board of Directors JGL d.d.



mr.spec. Eva Usmiani Capobianco, President of the Board of Directors