



GEDEON RICHTER

**CODE OF ETHICS
OF GEDEON RICHTER PLC. AND ITS AFFILIATES
("RICHTER")**

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I COMPLIANCE AND BUSINESS INTEGRITY

I.1 Richter's Global Compliance Program

This Code of Ethics acts as a guide to ethical conduct and provides general guidelines regarding responsible, ethical, and legal business conduct for the employees and partners of both Gedeon Richter Plc. ("*Company*") and its affiliates ("*Affiliate(s)*"); (the Company and the Affiliates are collectively referred to as "*Richter*").¹

To ensure that it can provide specific guidance in different fields of operation and high-risk areas, Richter has implemented a group-wide applicable Global Compliance Program. The manuals and regulations referenced by this Code of Ethics constitute a part of Richter's Global Compliance Program.

Even while everyone is required to read and follow the Code of Ethics, manuals, and regulations, you cannot expect to find guidance on every decision you must make. In situations which are not covered by the Code of Ethics or the manuals and regulations about Richter's Global Compliance Program, answering the following questions will enable our employees to exercise their discretionary powers responsibly as expected:

- Is it legal?
- Is it ethically sound?
- Is it in line with Richter's values?
- Would your line manager or the Company's CEO agree that this is the right decision?
- Would you and your coworkers be at ease if it was widely publicised?

Richter's Global Compliance Program also aims to bring our employees together. A community based on values will only develop where employees in leadership roles at various levels of the organisation manage to demonstrate a sense of enhanced responsibility, which is something we expect them to do.

I.2 An enhanced level of responsibility for compliance in the management

Just like any other Richter employee, managers are required to observe the Code of Ethics. However, you as a manager, are also responsible for making sure that your team members familiarise themselves with our Code of Ethics and for confirming that they have understood it. Also, in anything you do, you are expected to demonstrate your respect for the highest ethical standards. As a manager, you should build an infrastructure and environment which detects and responds to ethical, compliance and regulatory risks. Whenever possible, you as a manager, are required to create opportunities to demonstrate and discuss ethical conduct, share arising

¹ "Affiliate(s)" refers to any legal entity directly or indirectly controlled by or jointly controlled with the Company. 'Control' indicates that an entity or person alone, or jointly with others, has the legal or effective ability to control the votes of, or control and direct the administration of another entity whether through a contract or otherwise.

challenges with your team members and create an environment of openness which encourages your team members to turn to you with any questions and issues they may have.

We believe that any intentional blindness to or ignorance of compliance risks is a clear sign of a lack of leadership qualities. If you are a manager, we expect you to act responsibly in the following situations:

- For every activity, assess any potential impacts on Richter's reputation and long-term interests.
- Strive to achieve integrity in general and apply a leadership style which reflects our values.
- Lead by example in your daily work, by demonstrating ethical and compliant conduct.
- Thoroughly study and follow the Code of Ethics, the compliance manuals and regulations, and require all your team members to attend mandatory training sessions.
- Be open to any employee concerns.

The Legal and IP Department is in charge of implementing and operating Richter's Global Compliance Program, where practical implementation means that they monitor the adherence to this Code of Ethics and other Richter policies.

I.3 Applicable laws and regulations

Richter and its employees are subject to many rules and regulations designed to protect patients and consumers, improve the quality of medicinal products and healthcare services and help eliminate fraud and improper influence on medical judgement.

Due to Richter's global presence, our Affiliates are also subject to the laws and regulations of the country where they operate. If local laws and regulations differ from Richter's compliance manuals and regulations, the stricter (generally local) requirements shall be applied. All employees must understand and comply with the laws, regulations and ethical standards that apply to Richter and their respective positions.

Should a law or regulation prevent an employee from following this Code of Ethics or any of the compliance manuals and regulations, the employee is required to consult their manager and the Legal and IP Department or report this circumstance according to this Code of Ethics.

II THE PROTECTION OF INFORMATION

II.1 Confidentiality, trade secrets

The products, services, ideas, concepts and other information we create and collect daily are important proprietary assets for Richter. These include marketing plans, sales data, clinical and medical data, customer and employee records, manufacturing techniques, pricing data and information about business development opportunities.

The scope of information which is considered confidential and regarded as trade (industrial) secrets of Richter (either of the Company or an Affiliate) includes in particular, but not exclusively,

all fundamental information that influences Richter's activity, which should therefore be safeguarded both during the employment relationship and afterwards.

It is important that Richter and its employees protect such information, and prevent inappropriate or unauthorised access to or disclosure of such information, as well as any third-party information provided to Richter.

Employees are not allowed either to disclose to third parties any other facts, data, or information about Richter, unless with Richter's prior approval; and they may not do anything to make such facts, data, and information accessible to any third parties.

As regards confidentiality obligations, taking into consideration legal and regulatory requirements, Richter will cooperate with all government authorities during any site visits they perform and provide data as requested. The competent legal division helps to determine, on a case-by-case basis, what information needs to be provided.

Confidentiality does not extend to the obligation to provide, report, and inform the public of data of public interest, nor to the obligation to provide the data, reports, and information required by law.

II.2 Protection of personal data

According to the applicable laws, Richter, and its business partners and agents are accountable for protecting personal data, and for processing personal data only within the boundaries of applicable laws, Richter policies and procedures.

Therefore, Richter, and its business partners and agents, as well as the employees are required to follow the principles and requirements set out in the relevant laws and regulations, and in Richter's internal manuals, regulations, or other guidelines.

In addition to the applicable laws, for more information on data protection and legitimate data processing, please consult Richter's Global Privacy Regulation and the other internal regulatory tools specifically related to data processing. Should you have any questions regarding data protection and privacy issues, please contact the Company's Legal and IP Department (registered office: H-1103 Budapest, Gyömrői út 19-21., Hungary, email: dataprotection@richter.hu).

II.3 Protection of inside information

All Richter employees are obliged to handle confidentially and to protect information related to the Company which is deemed inside information and to observe the requirements set out in laws and the relevant Richter policies on insider dealing, market manipulation and unlawful disclosure of inside information. These obligations apply not only to the Company's employees but also to all those who are regarded as "*insider persons*" under the effective Hungarian and European Union laws.

By the statutory provisions, Richter generally prohibits insider dealing, market manipulation, and the unlawful disclosure of inside information.

It is strictly prohibited to use inside information in connection with the buying or selling of shares or other transactions related to shares, whether for someone's benefit or for a third-party's

benefit, directly or indirectly, or to share such inside information with any unauthorised third-party or disclose such information without authorisation.

For further details, please refer to Richter's Capital Market and Corporate Regulations Manual.

III CONFLICTS OF INTEREST, FRAUD PREVENTION AND ANTI-CORRUPTION MEASURES

III.1 Conflicts of interest and fraud prevention

All employees are required to avoid any situation that may create the appearance of a conflict of interest between the employee and Richter. During the term of employment, employees may not pursue any business, industrial or other activities which lead to a conflict of interest with Richter. Further, detailed guidance on this is to be found in the employment contract and/or the relevant local regulations.

The employee shall inform the competent manager of any potential conflict of interest, asking for their approval. In certain cases, the manager may seek guidance from the Legal and IP Department.

Self-check on conflicts of interest

The fraud prevention principle of Richter's Global Compliance Program requires employees to consciously strive to prevent fraud and any loss or fraud affecting Richter's property and assets. Since our awareness of any conflicts of interest is a fundamental requirement of our fraud prevention initiative, we have implemented a system of self-checks on conflicts of interest.

To self-check on conflicts of interest and determine whether you should report any potential conflicts of interest to your manager, please always ask yourself the following questions, before you make a decision or engage in an activity:

- Does the decision or activity yield some benefit or other incentive to me or a person in contact with me at the expense of Richter?
- Do others see the decision or activity as one that yields some benefit or other incentive to me or a person in contact with me at the expense of Richter?
- Does the decision or activity harm my or Richter's reputation in connection with a conflict of interest (especially if it has appeared in the press)?
- Would the decision or activity negatively affect my ability to perform my duties at Richter?
- Would the decision or activity potentially harm Richter's interests?

If your answer to any of the above questions is 'YES', consult your manager before you make the decision or engage in the activity concerned.

Should any irregularity or suspected violation arise, the first thing the Legal and IP Department asks will be: *"Have you gone through the above self-check questions?"*

A failure to go through the self-check questions is regarded as a serious violation, which may result in disciplinary action.

III.2 Anti-bribery and anti-corruption measures

In some countries, a business relationship may involve business-related entertainment or the exchange of gifts of nominal value among business partners. Employees are only allowed to accept or give such gifts, entertainment, or any kind of advantage if it is by the applicable laws and in line with Richter's Code of Ethics and other compliance manuals and regulations.

In general, gifts and entertainment may only be accepted or given if they are of nominal value, unsolicited and occasional, but they cannot, under any circumstances, be cash or cash equivalent.

Richter strictly prohibits Richter employees and anyone acting on Richter's behalf from offering, giving, requesting, accepting, or receiving a bribe. Neither any employee nor anyone acting on Richter's behalf may ever offer or provide (or authorise) any payment or other benefit which is intended to improperly influence a government official or to ensure unfair business advantage (or create such impression).

If any Richter employee or any of Richter's business partners makes any unauthorised payments or demonstrates any other corrupt business behaviour in a relationship with any individual, public official or institution, such employee or third-party can be subjected to civil or criminal proceedings, which can cause damage to Richter.

For more detailed rules, please refer to the Anti-Bribery and Anti-Corruption Regulation, the observance of which is mandatory for Richter employees.

IV GENERAL EMPLOYMENT RULES

IV.1 Equal opportunities

It is Richter's policy to provide equal employment opportunities to all and to treat applicants and employees equally, without regard to personal characteristics such as race or ethnic origin, colour, religious or philosophical beliefs, sex, sexual orientation, age, gender identity or gender expression, nationality, marital status, pregnancy, childbirth or related medical condition, genetic information, military service, medical condition (as defined by local laws) or other characteristics protected by applicable laws.

Managers are responsible for ensuring compliance with this Code of Ethics. Each operating unit should periodically monitor, report and, if necessary, improve its performance in providing equal opportunities.

On the other hand, Richter expects all its employees to refrain from every form of discrimination (direct or indirect), harassment and retaliation.

IV.2 Human rights and the fight against human trafficking, child and forced labour

Richter employees shall respect human rights as defined in the relevant international conventions and local laws and regulations.

Richter strongly condemns practices of human trafficking, child exploitation and forced labour and is committed to preventing these practices in its operations, and also within its supply chain.

Richter also strictly prohibits harsh and cruel treatment of employees.

IV.3 Discrimination, harassment, and anti-retaliation

Richter promotes and values a work environment free of verbal and physical harassment. Employees who engage in acts of harassment or discrimination are subject to disciplinary action that may include the termination of employment, subject to applicable law. Managers are responsible for maintaining business units that are free of harassment and discrimination.

Richter is also committed to providing an environment that is free of retaliation. Retaliation against any employee who, in good faith, seeks advice, raises a concern, reports misconduct or provides information in an investigation is strictly prohibited. Should any individual, regardless of their role with Richter, retaliate against an employee who has truthfully and in good faith reported a potential violation, Richter will take appropriate action.

IV.4 Protection of privacy

Richter respects personal privacy and facilitates the enforcement of rules protecting privacy and family life. Nevertheless, Richter expects that the employees' behaviour and activities outside working hours do not conflict with the obligations they have as a result of their employment with Richter, and do not harm Richter's reputation. The protection of privacy can be realised in connection with the protection of personal data, among others.

IV.5 Political activities

While Richter encourages its employees to participate in electoral politics in those countries where it is possible, they can only pursue such activity strictly in an individual and private capacity, and never on behalf of Richter. Employees may not pursue personal political activity during their working hours at Richter or use Richter's property or equipment for this purpose.

If an employee pursues political activities, they are expected

- not to engage in political activities in the workplace or during working hours;
- to ensure that their political activities do not result in a conflict of interests as defined in the relevant laws; and
- to comply with legal regulations and Richter's internal rules, regulations, manuals, policies or other guidelines.

IV.6 Substance abuse

Substance abuse can pose serious health and safety hazards in the workplace. Richter is committed to achieving an environment free of substance abuse for the health and well-being of employees and for the benefit of Richter.

The use of illegal drugs and the misuse of alcohol or other substances, including over-the-counter ("OTC") or prescription-only ("RX") drugs are prohibited in the workplace.

The workplace includes all places where an employee is conducting Richter business, regardless of time or location.

IV.7 Company assets

Richter's assets serve to facilitate the work of its employees. By using the assets properly, employees can contribute to Richter's success and further its goals.

Assets (in particular computing devices) and the programs installed on them which are provided to employees to be used exclusively or primarily for work, as well as all the information and data stored in Richter's electronic systems, all information and data stored on the computing devices and data carriers used by employees relating to Richter and the work performed are Richter's (either the Company's or an Affiliate's) property.

IT and telecommunications equipment and other assets provided by Richter are to be used primarily for job-related purposes. Richter is authorised to monitor the employees' compliance with this rule even in the absence of the employees by electronic and/or physical means. This monitoring is especially related to the usage of the programs installed on the computing devices and to the monitoring of email communications. Monitoring is carried out based on the relevant legal regulations and Richter's other internal policies. The assets may be used for private purposes according to the relevant internal regulations.

Employees are expected to safeguard the physical integrity of the assets provided for their work and to use them appropriately and economically. They should not incur excessive or unreasonable costs or use them improperly or with unjustified frequency; nor should their use hinder or interfere with work.

Assets may only be used in compliance with Richter's confidentiality, data protection regulations and ethical norms.

IV.8 Keeping accurate books and records

Richter's business operations and activities are heavily regulated and Richter has to meet several requirements when managing records and information. Each Richter employee is required to manage records and information in compliance with the applicable laws and regulations. Failure to meet record-keeping and management requirements can result in serious consequences including loss or corruption of assets or sanctions and fines against Richter.

By the statutory provisions in force and the Regulations for Listing, Continued Trading and Disclosure of the Budapest Stock Exchange, the Company publishes its announcements and disclosures as well as its ordinary and extraordinary information on the website of the Budapest Stock Exchange, the website dedicated to capital market disclosures managed by the National Bank of Hungary, and on Richter's website. For further details, please refer to Richter's Capital Market and Corporate Regulations Manual.

V RESEARCH AND DEVELOPMENT AND THE PROTECTION OF IP RIGHTS

All employees are responsible for proceeding in a manner consistent with Richter's high expectations for quality and integrity in research and development and for reporting concerns through any of the available channels, including those described in Annex I to this Code of Ethics.

Richter is committed to maintaining the integrity and quality of clinical data from its sponsored studies, to ensure that its submissions are built upon data of the highest quality at all times.

Richter's processes and procedures drive quality, compliance and high performance at every stage.

Richter's policies and procedures aim to ensure respect for the health, well-being and safety of research participants as well as for the culture, laws and regulations of the countries in which the studies are conducted. For further details, please refer to the Pharma Law Regulation in Richter's Business Conduct and Transparency Regulation.

Richter's intellectual property is one of its most valuable assets as it is essential to maintain its competitive advantage. It includes inventions, know-how, patents, trademarks, industrial design rights, regulatory data, copyrights, trade secrets, domain names, scientific and technical knowledge, and any other potential intellectual or industrial property rights. All employees are expected to support and safeguard the protection, maintenance, defence, and enforcement of Richter's intellectual property rights.

In line with the above, Richter's intellectual property needs to be protected from unauthorised access, disclosure, and illegitimate use. In particular, employees must refrain from making unprotected intellectual property available to external parties without prior authorisation from their manager and a signed confidentiality agreement with such parties. Richter and its employees respect the intellectual property of others. Unauthorised use, theft or misappropriation of third-party confidential information or intellectual property may result in serious legal consequences such as fines, injunctions, or criminal penalties.

VI QUALITY REQUIREMENTS

VI.1 Manufacturing and supply quality

Richter is committed to ensuring that its products are manufactured and supplied in conformity with the highest standards of quality. Richter's manufacturing operations are conducted in compliance with applicable regulatory requirements, Good Manufacturing Practice ("GMP") and its own rigorous internal quality standards. Richter and its employees are all responsible for ensuring that they perform their responsibilities in a manner consistent with Richter's unwavering commitment to quality and compliance, and for reporting quality issues and concerns through the appropriate channels.

VI.2 Ensuring and monitoring the safety and quality of Richter's products

Employees are responsible for forwarding relevant safety and quality information to the local drug safety unit or appropriate Richter contact within 24 hours from when the information is received. For further details, see Richter's Regulation on Pharmacovigilance.

VII GENERAL RULES ON PROVIDING PRODUCT INFORMATION

VII.1 Communicating product information

Richter is committed to providing timely and honest product information to patients, consumers, healthcare professionals and regulators worldwide to keep these stakeholders informed on the uses of its products, and the efficacy and safety relating to their uses.

VII.2 Marketing ethics

Richter employees shall strictly comply with the laws on pharmaceutical marketing communications and the Code of Ethics, and make every effort to establish suitable partnerships with healthcare professionals and other customers when providing information about Richter's products; to emphasise the advantages of Richter products when providing product information in a professional and scientifically grounded manner, and refrain from disparaging competing products and discrediting the competition.

VII.3 Marketplace and interactions with healthcare professionals

Richter is committed to the highest standards of integrity and compliance with applicable laws and regulations in every aspect of its relationships with healthcare professionals.

All promotional materials and communications must be accurate, not misleading and compliant with the applicable medical, legal and regulatory standards, including the requirements on substantiation, scientific rigour, and fair balance.

Richter employees shall comply with Richter's policies and procedures on labelling, promotional programs, product samples and other topics that affect their roles and responsibilities. For further details, please see Richter's Business Conduct and Transparency Regulation.

VIII GENERAL RULES OF COMPETITION

VIII.1 Antitrust and competition laws

It is the responsibility of Richter employees to be aware of antitrust and competition laws and their implications, including how they apply in the country in which they operate, regarding the fact that many countries have antitrust or competition laws, though they might slightly vary from country to country.

VIII.2 Prohibition of unfair competition

Richter refrains from damaging the reputation of its competitors and any behaviour that harms or jeopardises the competitors' credibility.

Richter employees may not obtain or use the trade secrets of another company unfairly; nor may they communicate such secrets to another person without authorisation or disclose them to the public. Unfairly obtaining trade secrets also includes acquiring a trade secret without the approval of the authorised person or with the collaboration of a person who has a confidential relationship or business relationship with that person.

Competition laws have a significant impact on the business activities of Richter, including relations with competitors and business partners (suppliers and distributors). Competition laws are enacted in over 100 countries worldwide, in all Member States of the European Union and by the European Union itself. Competition authorities are increasingly active in cartel enforcement and international cooperation has improved, resulting in increased regulatory scrutiny. Within the European Union, the European Competition Network (ECN) has created even tighter cooperation between the European Commission as a competition authority and the competition authorities of the Member States. It is not prohibited, however, to create competition with more

favourable business conditions. For further details, read Richter's Competition Law Compliance Regulation.

IX COMPLIANCE WITH TRADE CONTROL RULES

Richter and all its employees are responsible for complying with trade control laws, which are complex and may change quickly. Violations of global trade control laws can lead to significant fines and penalties, for both Richter and any individual involved, as well as other business and supply chain issues.

Many countries have laws that govern the import, export or transfer of certain controlled products, software, and technology, as well as the performance of certain controlled services. In addition, many trade control laws restrict Richter's investments, transactions and business activities with certain countries, entities, or individuals.

Employees who work directly or indirectly with any of the above, as well as related financial transactions, or in areas such as international operations, logistics, finance, event organisation, regulatory or legal, must be aware of Richter's global trade controls regulation and related procedures.

X PROTECTING RICHTER'S REPUTATION

X.1 Representing Richter

All employees are expected to be aware of Richter's interests while they are working; to represent Richter's values and act in accordance with them; not to communicate on behalf of Richter without proper authorisation or permission, and not to disclose to the public or a third person any Richter standpoint, information, etc.; to communicate within the scope of their expertise and job duties and in a goal-oriented way on topics related to the Company and their work. For details, please see Richter's Regulation on Corporate Communications .

X.2 Social media

When engaging in social media activities including both internal- and external-facing platforms, employees shall adhere to Richter's policies. They are required to perform their duties paying particular attention to the privacy and personal data of others and only pursue activities in line with the applicable laws (i.e., they may not share data or recordings of others or violate other individuals' rights). Richter's policies impose requirements on the creation and use of Richter-sponsored social media. The employees shall consult the Company's Communications and Government Relations Department and the Legal and IP Department when creating any Richter-sponsored social media. For further details, please see Richter's Regulation on Corporate Communications and Regulation on Website Content .

X.3 Media, analysts and public inquiries

Richter is committed to delivering accurate and reliable information to the media, financial analysts, investors, and other members of the public. All public disclosures, including forecasts, press releases, speeches and other communications must be honest, accurate, timely and representative of the facts.

Only the Chief Executive Officer, the Chairman and the persons authorised by them are entitled to represent Richter to answer questions from the media, financial analysts, investors, or other members of the public. For details, please see Richter's Regulation on Corporate Communications.

XI RICHTER AND THE COMMUNITY

XI.1 Corporate Social Responsibility ("CSR")

Richter is committed to participating in, helping and improving the community and environment in which it operates, as an example by contributing to educational and social programs.

XI.2 Protecting the environment, health and safety

Richter strives to contribute to sustainable development, internally and externally. Protecting the environment, and the health and safety of Richter employees, contingent workers, visitors and the communities in which Richter operates is a business priority and is core of Richter's values.

XII REPORTING

XII.1 Reporting of violations

In case of violations of the Code of Ethics and/or the Global Compliance Program, or questions regarding the Code of Ethics, the Global Compliance Program and its manuals and regulations, please contact the Legal and IP Department (phone: +36 1 431 4700; email: compliance@richter.hu) for advice as detailed in Annex I to this Code of Ethics.

The only persons authorised to use this email address are the Compliance Officer and the Compliance Manager, who treat all of the information sent to this email address confidentially and guarantee to keep the identity of persons making reports confidential. Anonymous reports are dealt with and investigated only if there is a suspicion of a crime having been committed; there is an immediate danger to life, physical integrity or health; or it is likely that there has been a serious breach of obligations or Richter's policies. For detailed information on data processing related to reports, please refer to the privacy notice in Annex [...].

Richter prohibits and will use every available means to prevent anyone from suffering discrimination or sanction for expressing and reporting their concern regarding the provisions of the Code of Ethics.

XII.2 Consequences of violating the Code of Ethics, the Global Compliance Program and its manuals and regulations

Violations of the provisions of the Code of Ethics, the Global Compliance Program and its manuals may entail legal liability depending on the circumstances of the case.

The legal consequences under labour law depend on all of the circumstances of the case and could include a warning, adverse legal consequences or termination of employment. Any violation of this Code of Ethics will be treated seriously by Richter and may result in disciplinary action up to and including termination of employment and/or termination of employment contract, or for contractual partners, termination of the service agreement or other civil law relationship. Ignorance of Richter's standards and/or local law is not an excuse for failure to comply.

XIII EFFECTIVE DATE OF THIS CODE OF ETHICS

This Code of Ethics enters into force on the day it is signed and will remain in force until such time as it is rescinded.

The previously effective Code of Ethics becomes null and void at the time this Code enters into force.

Budapest, 25 July 2023

Gábor Orbán
CEO

ANNEX I: INTERNAL RULES ON THE MANAGEMENT OF COMPLIANCE REPORTS FOR GEDEON RICHTER PLC. AND ITS AFFILIATES OPERATING IN THE EUROPEAN UNION

1 PREAMBLE

- 1.1 In line with the values, history, and vision of Gedeon Richter Plc. (hereinafter: “*Company*”), the Global Compliance Program of the Company and its Affiliates have been introduced, which gathers and arranges the values and norms that must be observed by Richter employees and Richter’s business partners in the course of their business activities. (In relation to the present Rules, Gedeon Richter Plc. and its Affiliates operating in the territory of the European Union are hereinafter collectively referred to as: “*Richter*”)
- 1.2 Our history is an excellent demonstration of our values, which helped us earn a reputation. At Richter, we believe that our business activities, including research, development, manufacturing, distribution, marketing, government interactions, sales, and promotion have to be shaped by compliance with the highest ethical standards, regulations, and practices in the pharmaceutical industry. The Compliance Handbook which constitutes an integral part of the Global Compliance Program was put together for the purpose of expressing our commitment to Richter’s law-abiding and responsible everyday operation.
- 1.3 Continuous success and growth in a highly competitive industry are both Richter’s everyday business aim and long-term vision. To achieve them, our business strategy embraces the values of *integrity, ethics, and compliance*. Each Richter employee, consultant, representative, supplier and other business partner must comply with the provisions of the respective national and supranational (including in particular those issued by the European Union) laws and industrial ethical regulations, the Compliance Handbook and the revised and updated Code of Ethics that constitutes a part thereof in the course of their interactions with other stakeholders such as healthcare professionals, patients, healthcare organisations and patient organisations. Richter is committed to upholding market competition in its business activities and to acting in a law-abiding and ethical manner in all of its business transactions.
- 1.4 In accordance with Richter’s Global Compliance Program and in light of the Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (hereinafter referred to as “*Directive*”), the Richter Virtual Compliance Officer (hereinafter referred to as: “*Richter VCO*”) has been established for managing and following up reports related to the Compliance Handbook and applicable national and supranational laws and industrial ethical regulations received through any of the channels detailed below, as an internal group-level system comprising the affiliates operating within the territory of the EU. For the system to operate effectively, all Richter employees are obliged, while the representatives/employees of business partners, Richter’s potential employees (candidates), Richter’s former employees, and the persons exercising owner’s or supervisory rights over Richter are entitled to report any case where they have good reason to suspect a violation of the provisions specified in the effective laws, the industrial ethical regulations, the Compliance Handbook or other internal Richter rules.

- 1.5 We have set up dedicated communication channels for reporting such cases, the contact details of which are as follows:
- in writing:
 - online reporting channel (Richter VCO): <https://richter.vco.ey.com/>
 - e-mail address: compliance@richter.hu
 - orally: phone system for voice messaging only: +36 1 431 4700;

2 OBJECTIVES OF THE PRESENT RULES

- 2.1 The Richter VCO is a confidential internal reporting system that serves for the management of reports pertaining to illegal or allegedly illegal acts or omissions and other fraud (hereinafter: “*Reports*”) and that facilitates the identification and management of instances of fraud, unethical conduct, and breaches of the law.
- 2.2 The Richter VCO constitutes an integral part of Richter’s Global Compliance Program, which focuses on strengthening a corporate culture and business relationships built on trust and fairness and on preserving Richter’s good reputation.
- 2.3 These Rules define the purpose, scope, principles, and process of the operation of the Richter VCO and other internal Reporting Channels and the persons and organisations that are responsible for managing reports.

3 SCOPE OF THE RULES

3.1 Scope of application

These Rules shall be applied related to the reports set out in Section 2.1 from the moment the report is made until its closure (including the retention of the relevant documentation and any appeal proceedings).

3.2 Territorial scope

These Rules and the Richter VCO system shall apply to Richter’s Affiliates operating within the European Union in their respective areas of operation, provided that these Rules set out the minimum requirements under the Directive and where an appropriate national implementation has been made under the Directive or the company’s national requirements differ from these Rules, the company concerned has to develop and publish its internal rules in accordance with its national law.

3.3 Personal scope

3.3.1. These Rules shall be applied to any Reporter, namely

- 3.3.1.1 persons having the status of a worker who has acquired information on breaches in a work-related context including, in a broad sense, the following:
- (a) employees of Richter (including employees under an employment contract and contracted staff)
 - (b) contracted persons of Richter having self-employed status
 - (c) shareholders and persons belonging to the administrative, management or supervisory body of Richter
 - (d) paid or unpaid trainees

- (e) any persons working under the supervision and direction of contractors, subcontractors, and suppliers of Richter
 - 3.3.1.2 These Rules shall also be applied to Reporters where they report information on breaches of law acquired in a labour law/contractual relationship with Richter (in a broad sense) which has ended by the time when the report is made.
 - 3.3.1.3 These Rules shall also be applied to Reporters whose labour law/contractual relationship with Richter is yet to begin at the time when the report is made in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations.
- 3.3.2 These Rules shall also be applied to all persons involved in handling, investigating, and responding to whistleblower reports on behalf of Richter (hereinafter referred to as "**Investigators**") and to any external experts involved in such processes (hereinafter referred to as "**Investigation Experts**").

4 DEFINITIONS AND PRINCIPLES RELATING TO THE MANAGEMENT OF REPORTS

4.1 Definitions

- 4.1.1 **Richter Virtual Compliance Officer – "Richter VCO"**. Richter Gedeon Plc's complex, centralised internal reporting and whistleblowing management system which functions as a written reporting channel is available to Reporters on the following website: <https://richter.vco.ey.com/>
- 4.1.2 **Reporting channel**. Dedicated internal channels for submitting and receiving reports of conduct that contravene the provisions of national and supranational laws, industrial ethical regulations, the Richter Compliance Handbook, and other internal rules. (See Section 1.5.)
- 4.1.3 **Reporter**. Individuals subject to these Rules (see Section 3.3) who have observed any conduct in connection with Richter that is in violation of the provisions of national and supranational laws, industrial ethical regulations, the Richter Compliance Handbook, other internal rules and who bring such conduct to the attention of Richter through the Reporting Channels. For detailed information on the processing of the Reporter's personal data, please refer to Annex III.
- 4.1.4 **Person concerned by the report**. A natural or legal person whose act or omission gives rise to the Report. For detailed information on the processing of the Person concerned by the report's personal data, please refer to Annex III.
- 4.1.5 **Third-party concerned by the report**. A natural or legal person who/which may have substantial information on the content of the report, or who/which is, in any way, named or referred to in the report so that they are identifiable. For detailed information on the processing of the Third-party concerned by the report's personal data, please refer to Annex III.

4.2 Basic principles

- 4.2.1 **Reporting expectation**. Each person employed by Richter or the contracted staff has the obligation to submit a report whenever they become aware of or have reasonable

grounds to suspect, abuse, misconduct, or conduct that is contrary to national or supranational laws, industrial self-regulatory requirements, the provisions of the Richter Compliance Handbook, or other internal regulations. Richter expects persons other than employees to report as well.

- 4.2.2 **Protection of Reporters.** The protection of Reporters is especially important for Richter, and for this reason, we guarantee that no Reporter will be subjected to any form of retaliation, discrimination, or other unfair treatment. Reporters must not be discriminated against even if they submit a report in good faith that proves to be unfounded or incomplete during the investigation.
- 4.2.3 **Confidential treatment of information.** The identity of the Reporter, the Person concerned by the report and the Third parties concerned by the report and the personal data which are indispensable for investigating the report can only be processed for the purposes of investigating the report, remedying, or discontinuing the conduct described in the report, and they can only be transferred to persons involved in the investigation. From the data managed via Richter's VCO system or other Reporting channels, the ones which are not needed for investigating the report, remedying, or discontinuing the conduct described in the report, and the ones which may not be processed under the applicable data protection requirements, are promptly deleted. The Reporter's personal data may only be transferred to a body competent to conduct the procedure initiated on the basis of the report (external reporting channel), except for the section entitled "Requirement of good faith" below, if this body is legally entitled to process it or the Reporter has granted prior consent to the transfer. The Reporter's personal data mustn't be disclosed to the public without their express prior consent. Until the investigation is closed or criminal proceedings are initiated as a result of the investigation, the Investigators and Investigation Experts shall keep confidential all information about the substance of the report, the Person concerned by the report or Third Parties concerned by the report and may only share such information with any other organisational unit or employee of Richter to the extent that is indispensable for conducting the investigation. If the report concerns an individual, in exercising their right of information and access under the provisions on the protection of personal data, the Reporter's personal data may not be made accessible to the person requesting information.
- 4.2.4 **Option of anonymous reporting.** Reporters may also submit their reports anonymously if they so wish. In such cases, we never attempt to identify or reveal the identity of the Reporter. When submitting an anonymous report, the Reporter shall ensure that their anonymity is also preserved in the body text of the report and that they avoid any wording or information that would enable the investigators of the report to clearly identify the Reporter.
- 4.2.5 **Requirement of good faith.** The Reporter is expected to submit the report in good faith, on circumstances that they have knowledge of, or have good grounds for assuming them to be true. In cases where it has become clear that the Reporter communicated untrue information of crucial importance in bad faith, or abusively, repeatedly, or groundlessly made a report and
- (a) it gives rise to an indication that a crime or an infraction was committed, the personal data of the Reporter shall be handed over to the body or person entitled to carry out proceedings;
 - (b) there is good reason to consider it likely that the Reporter caused unlawful damage or other harm to the rights of others, their personal data shall be handed over to the body or person entitled to initiate or carry out proceedings, upon request.

If it becomes clear that the Reporter provided untrue data or information in bad faith, the investigation based on which a report is resolved can be closed without taking any measures.

If a part of the report is, in an illegal way,

- (a) suitable to negatively affect the social recognition of another employee or Richter, or it is expressed in an unreasonably hurtful way, and/or
 - (b) suitable to state or spread any offensive and/or untrue fact regarding another employee or Richter, or presents a true fact in false light,
- it is permitted to ignore that part of the report in the investigation.

4.2.6 **Ensuring a fair process.** We ensure that the process will be fair, independent, and professional. The process will be conducted, regardless of the position or identity of the Reporter and of the Person(s) concerned by the report, in accordance with the spirit of the Richter Compliance Handbook, these Rules and the applicable laws.

4.2.7 **Unified rules applicable to the management of reports.** Reports received via any reporting channel are handled by the Group Compliance Officer according to Section 5 below, in the manner described in these Rules and in accordance with the applicable laws.

5 REPORT MANAGEMENT

5.1 **Method of reporting.** As a general rule, reports can be made in writing, via the Richter VCO system, by filling and submitting the form to be found at <https://richter.vco.ey.com/>. In addition, it is also possible to submit an oral report by phone on +36 1 431 4700 by leaving a message on the answering machine, or a written report by sending an email to compliance@richter.hu.

When a report is submitted by phone, after information is provided according to the privacy rules, the Reporter's voice message is recorded in a permanent and retrievable format.

5.2 **Group Compliance Officer.** The Group Compliance Officer is the person authorised with this responsibility by the Company's CEO.

5.3 **Language of reporting.** Reports can be submitted on the Richter VCO and other Reporting channels in the EU languages in which Richter is present, i.e., Hungarian, Romanian, Polish, Czech, Italian, Spanish, German, French, Slovak, Bulgarian, Portuguese, Slovenian, Swedish, Croatian; and English in addition to the above.

5.4 **The information processed.** The report may require the following information:

- (a) some personal data of the Reporter (name, email address and telephone number); in the case of anonymous reports, these data do not have to be submitted;
- (b) the Reporter's relation to Richter;
- (c) category of the Report;
- (d) related area of business;
- (e) name of the person(s) and organisation(s) concerned by the Report who/which are alleged to have engaged in questionable conduct;
- (f) detailed description of the case; and

- (g) all relevant information associated with the case, including the time and place of the infringing conduct, the source of information, the estimated amount of damage incurred, if any; and
- (h) the measures suggested by the Reporter.

If the report is submitted in writing (on the Richter VCO or by email), the Reporter may also attach documents that may be helpful for the investigation. The provided personal data will be handled in strict confidence in all cases, in accordance with the applicable privacy laws. Privacy information regarding the reports made in the Richter VCO system is available in the Richter VCO system, while detailed information in connection with the personal data processing regarding reports made by other Reporting Channels is provided in the Privacy Notice in Annex III.

- 5.5 **Joint data processing, joint data controllers.** The data controllers of the Reporting Channels are Gedeon Richter Plc. (registered office: H-1103 Budapest, Gyömrői út 19-21.; company registration number: Cg. 01-10-040944; tax number: 10484878-2-44) and the EU-based Affiliate concerned by the report, as joint data controllers.
- 5.6 **Data processor and data transfer.** In connection with Richter VCO system Ernst & Young Kft. (H-1132 Budapest, Váci út 20), which has established and is technically operating the VCO system is considered as data processor, while Ernst & Young spółka z ograniczoną odpowiedzialnością Consulting sp. k. (Warsaw, ul. Rondo ONZ 1, postcode: 00-124) is a sub data processor.

The involvement of Investigation Experts may entail data transfers, however, transfers to third countries or international organisations are subject to a legal commitment by the recipient of the transferred data regarding the report to abide by the relevant statutory provisions, with due regard to the personal data protection requirements.

- 5.7 **Duration of the personal data processing.** Reports received via the Reporting Channels are given a unique identification number, and on the basis of such identification number, the reports become registered and stored in the protected electronic system set up for this purpose. If the investigation concludes that the report is unfounded or there is no need to take further measures, we will delete the data relating to the report 5 years after the investigation is closed, while if any action is taken on the basis of the investigation, also including actions such as legal proceedings or disciplinary action launched against the Reporter, the data relating to the report may be processed in our reporting system until no later than the definitive conclusion of the external proceedings launched on the basis of the report.
- 5.8 **Notification obligation.** Richter notifies the Reporter about the investigation of the report or the omission of such investigation with the reasons for that, and the results of the investigation, with the measures taken or planned in writing. In this notification, it provided clear and easily accessible information on the operation of the internal reporting system, and the ensuing process. The Person concerned by the report and the Third-party concerned by the report shall receive detailed information about the report at the beginning of the investigation, including their rights with regard to the protection of personal data and the rules applicable to the processing of the data, within a reasonable time of receipt of the data, but in any event within 30 days. If there is a chance for the data to be communicated to further recipients (e.g., an authority), such notification must be made at the first

communication of that kind at the latest. In accordance with the requirement of fair procedure, Persons concerned by the report must be given the opportunity to present their positions via their legal representatives as well, substantiated by evidence. In exceptional and justified cases, the Person concerned by the report may be informed later if the immediate information would jeopardise the investigation of the report. If the investigation concludes that the conduct reported justifies the initiation of criminal proceedings or other official proceedings, Richter will arrange for such proceedings to be initiated.

- 5.9 ***Omission of investigation.*** The investigation of a repeated, abusive, or groundless report with the same content submitted by the same Reporter may be omitted, provided that the Reporter is informed within the time limits set by the applicable legislation.

The investigation of a report may be omitted if

- (a) it was made by an unidentifiable Reporter;
- (b) it was made by a person other than those entitled to do so according to Section 3.3.1;
- (c) it is a repeated report by the same Reporter, with the same content as the previous one;
- (d) if the harm to the public interest or overriding private interest is not proportionate to the restriction of the rights of the natural or legal person concerned by the report which would result from the investigation of the report.

Besides the case described above, the investigation of a report can also be omitted if the Reported submitted their Report more than six months after they learned of the act or omission they complained of. The Group Compliance Officer will omit the investigation of any Report submitted more than a year after the occurrence of the act or omission complained of.

- 5.10 ***Investigation of reports.*** The Company's Group Compliance Officer receives and documents reports and operates the Richter VCO system and the other Reporting Channels. Richter investigates reports as soon as possible under the given circumstances. The Reporter can continuously follow up on their report in the Richter VCO during the investigation. Irrespective of which Reporting Channel the Reporter has made the report through, acknowledgement of receipt of the report to the Reporter within seven (7) days of that receipt shall be made (including information on the omission of the investigation, or the information relating to the report and the data processing that becomes necessary in the ensuing investigation).

The Company's Global Compliance Officer investigates reports as soon as possible under the given circumstances but not later than 30 (thirty) days after their receipt, which time limit may only be extended in cases where it is highly justified, provided that the Reporter is simultaneously informed. In such a case, the Reporter must be notified of the expected time of investigation, along with the reasons for the extension. The deadline for investigating a report and for notifying the Reporter, even if extended, cannot exceed 3 (three) months. During the period of winter and summer shutdowns officially announced each year by the CEO of the Company the administrative deadline for the investigation is suspended.

During the investigation, Richter keeps in touch with the Reporter and may request them to supplement, specify the Report, clarify the facts of the case or provide further information.

- 5.11 ***Conflict of interests.*** If the Report affects the Group Compliance Officer (or the Company's Legal and IP Department), please submit your Report in writing to VCOaudit@richter.hu

instead of the Richter VCO and compliance@richter.hu. If you would report it by phone, please start the report with the following indication “GCO/LIPPD involved”², in which case the phone call or the e-mail will be forwarded without listening to it/reading it to the Head of the Audit Department of the Company for an unbiased assessment of the matter. If the report does not concern the Group Compliance Officer (or the Company’s Legal and IP Department), the Group Compliance Officer will have the discretion to decide whether an internal investigation should be conducted, including delegating the responsibility for investigating the report to the employees of the Company or the EU Affiliate concerned.

The Reporter, the Person concerned by the report and any other person who cannot be expected to have an unbiased opinion on the matter for any other reason, may not participate in investigating the report and making a decision. The designated Investigator, if any, is required to inform the Global Compliance Officer of any conflict of interest.

- 5.12 **Head of the investigation.** The investigation of a report is normally (if there is no conflict of interests) carried out under the top-level control of the Group Compliance Officer (hereinafter referred to as the “investigator-in-charge”). In cases where the Global Compliance Officer considers that other related areas (e.g., HR, finance) need to be involved in the investigation, the Global Compliance Officer will promptly involve them, including the relevant employees of both the Company and the EU-based Affiliate concerned by the Report. If the Group Compliance Officer has a conflict of interest in relation to the report, their powers, as set out in these Rules, shall be exercised by the Head of the Audit Department.
- 5.13 **Investigators.** Employees designated by the Group Compliance Officer with the appropriate expertise and job competence to investigate whistleblower reports, under the ultimate supervision of the Group Compliance Officer, who investigates whistleblower reports received through the Richter Reporting Channel.
- 5.14 **External expert.** In certain cases, if the Group Compliance Officer or the Investigators appointed by him/her consider that the content of the report requires special expertise for a successful investigation that cannot be provided within Richter, they may decide to call in external experts (Investigation Experts). Investigation Experts shall be subject to the obligations of conflict of interests, data protection and confidentiality set out in these Rules. The documentation generated by the Investigation Experts shall be made available to the Investigators and retained in the Investigation file. If the report is submitted in the Richter VCO system, the aforementioned documentation shall also be managed and recorded in the Richter VCO.
- 5.15 **Investigation report.** The Investigator summarises their findings in a report and, on this basis, formulates a response to the Reporter. If the report requires a complex response, there is the possibility of a panel examination of the report if the Global Compliance Officer so suggests. The Reporter must be informed of the need for a panel response.

² GCO means Group Compliance Officer and LIPPD means the Company’s Legal and IP Department – See also Sections 4.2.7 and 5.2.

- 5.16 ***Supervision of reports management.*** The proper functioning of reports management should be reviewed regularly, taking into account possible changes in the legislative environment. The proper handling of the reports received in a given financial year (whether the report has been investigated, whether the deadlines have been respected, the outcome of the investigation) is verified by the Group Compliance Manager – or, in case of conflict of interests, by the Head of the Audit Department – by the end of June of the year following the financial year in question.
- 5.17 ***Miscellaneous provisions.*** These Rules shall take effect on the day it is signed and shall be valid until further notice.

Budapest, 25 July 2023

ANNEX II: RULES ON THE MANAGEMENT OF COMPLIANCE HOTLINE REPORTS FOR THE AFFILIATES OF GEDEON RICHTER PLC. OPERATING OUTSIDE THE EU

1 PREAMBLE

In line with the values, history and vision of Gedeon Richter Plc. (hereinafter: “*Company*”), the Global Compliance Program of the Company and its Affiliates have been introduced, which gathers and arranges the values and norms that must be observed by Richter employees. (In relation to the present Rules, Gedeon Richter Plc.’s Affiliates operating outside the territory of the European Union are hereinafter referred to as: “*Richter*”)

Our history is an excellent demonstration of our values, which helped us earn a reputation. At Richter, we believe that our business activities, including research, development, manufacturing, distribution, marketing, government interactions, sales, and promotion have to be shaped by compliance with the highest ethical standards, regulations, and practices in the pharmaceutical industry. The Compliance Handbook which constitutes an integral part of the Global Compliance Program was put together for the purpose of expressing our commitment to Richter’s law-abiding and responsible everyday operation.

Continuous success and growth in a highly competitive industry are both Richter’s everyday business aim and long-term vision. To achieve them, our business strategy embraces the values of *integrity, ethics, and compliance*. Each Richter employee, consultant, representative, supplier and other business partner must comply with the provisions of the Compliance Handbook and the revised and updated Code of Ethics that constitutes a part thereof in the course of their interactions with other stakeholders such as healthcare professionals, patients, healthcare organisations and patient organisations. Richter is committed to upholding market competition in its business activities and to acting in an ethical manner in all of its business transactions.

A Compliance Hotline has been set up in accordance with Richter’s Global Compliance Program which is a group-level system established for managing reports related to the Compliance Handbook. To ensure the efficient operation of the system, each colleague must report all cases where they notice conduct violating the provisions of the Compliance Handbook.

We have set up dedicated communication channels for reporting such cases, the contact details of which are as follows: phone: +36 1 431 4700; email: compliance@richter.hu

2 OBJECTIVES OF THE RULES

The Compliance Hotline is a confidential report management forum that serves for the management of complaints (hereinafter: “*Complaints*”) concerning ethics-related, unlawful conduct pertaining to the Compliance Handbook (including the Code of Ethics), and that facilitates the identification and management of instances of fraud, unethical conduct, and breaches of the law.

The Compliance Hotline constitutes an integral part of Richter’s Global Compliance Program, which focuses on strengthening a corporate culture built on trust and fairness and on preserving Richter’s good reputation.

These Rules define the purpose, scope, principles, and process of the operation of the Compliance Hotline and the persons and organisations that are responsible for managing reports.

3 SCOPE OF THE RULES

The personal scope of the Rules includes all Richter employees, consultants, representatives, and persons who are not employed by Richter but who are in a contractual or other employment relationship with Richter, as well as Richter's suppliers and other business partners (hereinafter: "*Person Concerned*").

4 DEFINITIONS AND PRINCIPLES RELATING TO THE MANAGEMENT OF COMPLAINTS

Reporting channel. Dedicated internal channels for submitting and receiving reports of conduct that contravene the provisions of national and supranational laws, industrial ethical regulations, the Richter Compliance Handbook, and other internal rules. (See Section 1.)

Reporter. Individuals subject to these Rules (see Section 3) who have observed any conduct in connection with Richter that is in violation of the provisions of national and supranational laws, industrial ethical regulations, the Richter Compliance Handbook, other internal rules and who bring such conduct to the attention of Richter through the Reporting Channels. For detailed information on the processing of the Reporter's personal data, please refer to the Privacy Notice in Annex III.

Person concerned by the report. A natural or legal person whose act or omission gives rise to the Report. For detailed information on the processing of the Person concerned by the report's personal data, please refer to the Privacy Notice in Annex III.

Third-party concerned by the report. A natural or legal person who/which may have substantial information on the content of the report, or who/which is, in any way, named or referred to in the report so that they are identifiable. For detailed information on the processing of the Third-party concerned by the report's personal data, please refer to the Privacy Notice in Annex III.

Reporting expectation. Each Person Concerned (from the time of reporting the Complaint: "*Reporter*") must make a report in such cases where he or she notices any abuse, breach of obligation or conduct that violates the provisions of national or supranational legislation, industrial self-regulatory norms, Richter's Compliance Handbook and/or any national or EU laws, or where the suspicion of such conduct comes to their attention.

Protection of Reporters. The protection of Reporters is especially important for Richter, and for this reason, we guarantee that no Reporter will be subjected to any form of retaliation, discrimination, or other unfair treatment. Reporters must not be discriminated against even if they submit a report in good faith that proves to be unfounded or incomplete during the investigation.

Confidential treatment of information. The identity of the Reporter, the Person concerned by the report and the Third parties concerned by the report and the personal data which are indispensable for investigating the report can only be processed for the purposes of investigating the report, remedying, or discontinuing the conduct described in the report, and they can only be transferred to persons involved in the investigation. From the data managed via the reporting channels, the ones which are not needed for investigating the report, remedying or discontinuing the conduct described in the report, and the ones which may not be processed under the applicable data protection requirements, are promptly deleted. The Reporter's personal data may only be transferred to a body competent to conduct the procedure initiated on the basis of the

report (external reporting channel), except for the section entitled “Requirement of good faith” below, if this body is legally entitled to process it or the Reporter has granted prior consent to the transfer. The Reporter’s personal data must not be disclosed to the public without their express prior consent. Until the investigation is closed, or criminal proceedings are initiated as a result of the investigation, the Investigators and Investigation Experts shall keep confidential all information about the substance of the report, the Person concerned by the report or Parties concerned by the report and may only share such information with any other organisational unit or employee of Richter to the extent that is indispensable for conducting the investigation. If the report concerns an individual, in exercising their right of information and access under the provisions on the protection of personal data, the Reporter’s personal data may not be made accessible to the person requesting information.

Option of anonymous reporting. Richter employees may also submit their reports anonymously if they so wish. In such cases, we never attempt to identify the Reporter. When submitting an anonymous report, the Reporter shall ensure that their anonymity is also preserved in the body text of the report and that they avoid any wording or information that would enable the investigators of the report to clearly identify the Reporter. Nevertheless, we do encourage our employees making reports to provide their contact details. The reason for this is that two-way communication helps us conduct the investigation efficiently, and enables the Reporter to provide additional information and monitor the progress and results of the process.

Requirement of good faith. The Reporter is expected to submit the report in good faith, on circumstances that they have knowledge of, or have good grounds for assuming them to be true. In cases where it has become clear that the Reporter communicated untrue information of crucial importance in bad faith, or abusively, repeatedly, or groundlessly made a report and

- (a) it gives rise to an indication that a crime or an infraction was committed, the personal data of the Reporter shall be handed over to the body or person entitled to carry out proceedings;
- (b) there is good reason to consider it likely that the Reporter caused unlawful damage or other harm to the rights of others, their personal data shall be handed over to the body or person entitled to initiate or carry out proceedings, upon request.

If it becomes clear that the Reporter provided untrue data or information in bad faith, the investigation based on which a report is resolved can be closed without taking any measures.

If a part of the report is, in an illegal way,

- (a) suitable to negatively affect the social recognition of another employee or Richter, or it is expressed in an unreasonably hurtful way, and/or
- (b) suitable to state or spread any offensive and/or untrue fact regarding another employee or Richter, or presents a true fact in false light,

It is permitted to ignore that part of the report in the investigation.

Ensuring a fair process. We ensure that the process will be fair, independent, and professional. The process will be conducted, regardless of the position or identity of the Reporter and of the Person(s) concerned by the report, in accordance with the spirit of the Richter Compliance Handbook, these Rules and the provisions effect of Act CLXV of 2013, in effect in Hungary.

Unified rules applicable to the management of Complaints. Compliance-related Complaints received via channels other than the Compliance Hotline are also handled in every case by the Group Compliance Officer (as defined below in Section 5, in the manner described in these Rules.

5 REPORT MANAGEMENT

Method of reporting. Complaints related to Richter's Compliance Handbook can be reported by phone at +36 1 431 4700 leaving a message on the answering machine, or by sending an email to compliance@richter.hu.

When a report is submitted by phone, after information is provided according to the privacy rules, the Reporter's voice message is recorded in a permanent and retrievable format.

Group Compliance Officer. The Group Compliance Officer is the person authorised with this responsibility by the Company's CEO.

Language of reporting. Reports can be submitted via the Compliance Hotline either in Hungarian or in English.

The information managed. The report may require the following information:

- (a) personal data of the Reporter (name, e-mail address and telephone number); in the case of anonymous reports, these data do not have to be specified;
- (b) the Reporter's relation to Richter
- (c) category of the Report;
- (d) related area of business;
- (e) name of the person(s) and organisation(s) concerned by the Report who/which are alleged to have engaged in questionable conduct;
- (f) detailed description of the case; and
- (g) all material information associated with the case, including the time and place of infringing conduct, the source of information, the estimated amount of damage incurred, if any; and
- (h) the necessary measures suggested by the Reporter.

If the report is submitted by email, the Reporter may also attach documents that can be helpful for the investigation. The provided personal data will be handled in strict confidence in all cases, in accordance with the applicable privacy laws. For detailed information on data processing related to reports made via the Reporting Channels, please refer to the Privacy Notice in Annex III.

Data controller. The Compliance Hotline is operated by Gedeon Richter Plc. (registered office: H-1103 Budapest, Gyömrői út 19-21.; company registration number: Cg. 01-10-040944; tax number: 10484878-2-44) and Affiliates outside the EU concerned by the report, as joint data controllers.

Duration of the personal data processing. Reports received via the Compliance Hotline are each given a unique identification number, and on the basis of such identification number, the reports become registered and stored in the protected electronic system set up for this purpose. If the investigation concludes that the report is unfounded or there is no need to take further measures, we will delete the data relating to the report 5 years after the investigation is closed, while if any action is taken on the basis of the investigation,

also including actions such as legal proceedings or disciplinary action launched against the Reporter, the data relating to the report may be processed in our Compliance Hotline reporting system until no later than the definitive conclusion of the external proceedings launched on the basis of the report.

Notification obligation. Richter notifies the Reporter about the investigation of the report or the omission of such investigation with the reasons for that, and the results of the investigation, with the measures taken or planned in writing. In this notification, it provided clear and easily accessible information on the operation of the internal reporting system, and the ensuing process. The Person concerned by the report and the Third-party concerned by the report shall receive detailed information about the report at the beginning of the investigation, including their rights with regard to the protection of personal data and the rules applicable to the processing of the data, within a reasonable time of receipt of the data, but in any event within 30 days. If there is a chance for the data to be communicated to further recipients (e.g., an authority), such notification must be made at the first communication of that kind at the latest. In accordance with the requirement of fair procedure, Persons concerned by the report must be given the opportunity to present their positions via their legal representatives as well, substantiated by evidence. In exceptional and justified cases, the Person concerned by the report may be informed later if the immediate information would jeopardise the investigation of the report. If the conduct reported justifies the initiation of criminal proceedings or other official proceedings, Richter will arrange for such proceedings to be initiated.

Omission of investigation. The investigation of a repeated, abusive, or groundless report with the same content submitted by the same Reporter may be omitted, provided that the Reporter is informed within the time limits set by the applicable legislation.

The investigation of a report may be omitted if

- (a) it was made by an unidentifiable Reporter;
- (b) it was made by a person other than those entitled to do so according to Section 3;
- (c) it is a repeated report by the same Reporter, with the same content as the previous one;
- (d) if the harm to the public interest or overriding private interest is not proportionate to the restriction of the rights of the natural or legal person concerned by the report which would result from the investigation of the report.

Besides the case described above, the investigation of a report can also be omitted if the Reported submitted their Report more than six months after they learned of the act or omission they complained of. The Global Compliance Officer will omit the investigation of any Report submitted more than a year after the occurrence of the act or omission complained of.

Investigation of reports. The Company's Group Compliance Officer receives and documents reports and operates the Reporting Channels. Richter investigates reports as soon as possible under the given circumstances. Irrespective of which Reporting Channel the Reporter has made the report through, acknowledgement of receipt of the report to the Reporter within seven (7) days of that receipt shall be made (including information on the omission of the investigation).

The Company's Global Compliance Officer investigates reports as soon as possible under the given circumstances but not later than 30 (thirty) days after their receipt, which time limit may only be extended in cases where it is highly justified, provided that the Reporter is simultaneously informed. In such a case, the Reporter must be notified of the expected time of investigation, along

with the reasons for the extension. The deadline for investigating a report and for notifying the Reporter, even if extended, cannot exceed 3 (three) months. During the period of winter and summer shutdowns officially announced each year by the CEO of the Company the administrative deadline for the investigation is suspended.

During the investigation, Richter keeps in touch with the Reporter and may request them to supplement, specify the Report, clarify the facts of the case or provide further information.

Conflict of interests. If the Complaint concerns the Group Compliance Officer (or the Company's Legal and IP Department), please submit your report in such a way, that you start the phone call or indicate in the subject of the email that the "GCO/LIPD is involved" in which case the phone call or the email will be forwarded to the Head of the Internal Audit Department without listening to it/reading it to ensure that the case is handled in a non-biased manner (after which the received email will be immediately deleted from the Inbox, Sent and Deleted messages). If the report does not concern the Group Compliance Officer (or the Company's Legal and IP Department), the Group Compliance Officer will have the discretion to decide whether an internal investigation should be conducted, including delegating the responsibility for investigating the report to the employees of the Company or the Affiliate outside the EU concerned.

The Reporter, persons concerned by the report and any other person who cannot be expected to have an unbiased opinion on the matter for any other reason, may not participate in investigating the report and making a decision. The designated Investigator, if any, is required to inform the Global Compliance Officer of any conflict of interest.

Head of the investigation. The Complaint is investigated by the Group Compliance Officer and/or, if warranted by the nature of the case, internal audit, security or any other designated specific department based on the decision of the Group Compliance Officer (hereinafter: Head of the investigation). If necessary, the Group Compliance Officer may delegate pre-specified partial tasks related to investigating the report to the Head of the specific department unit that is concerned by the matter.

Investigators. Employees designated by the Group Compliance Officer with the appropriate expertise and job competence to investigate whistleblower reports, under the ultimate supervision of the Group Compliance Officer, who investigates whistleblower reports received through the Richter Reporting Channel.

External expert. In certain cases, if the Group Compliance Officer or the Investigators appointed by him/her consider that the content of the report requires special expertise for a successful investigation that cannot be provided within Richter, they may decide to call in external experts (Investigation Experts). Investigation Experts shall be subject to the obligations of conflict of interests, data protection and confidentiality set out in these Rules. The documentation generated by the Investigation Experts shall be made available to the Investigators and retained in the Investigation file.

Investigation report. The Investigator summarises their findings in a report and, on this basis, formulates a response to the Reporter. If the report requires a complex response, there is the possibility of a panel examination of the report if the Global Compliance Officer so suggests. The Reporter must be informed of the need for a panel response.

Supervision the Compliance Hotline system. The proper functioning of reports management should be reviewed regularly, taking into account possible changes in the legislative environment. The proper handling of the reports received in a given financial year (whether the report has been investigated, whether the deadlines have been respected, the outcome of the investigation) is verified by the Group Compliance Manager – or, in case of conflict of interests, by the Head of the Audit Department – by the end of June of the year following the financial year in question.

Miscellaneous provisions. These Rules shall take effect on the day it is signed and shall be valid until further notice.

Budapest, 25 July 2023

ANNEX III: PRIVACY NOTICE FOR THE INVESTIGATIONS OF WHISTLEBLOWER REPORTS

Gedeon Richter Plc. (registered office: H-1103 Budapest, Gyömrői út 19-21.; company registration number: Cg. 01-10-040944; tax number: 10484878-2-44, hereinafter: „Richter”; Data Protection Officer’s email address: dataprotection@richter.hu) as data controller hereby informs you as the Reporter, Person concerned by the report and Third-party concerned by the report (jointly referred to as “Data Subject”) on the processing of personal data connected to the investigation of whistleblower reports.

A. Basic information on data processing operations according to data subject categories

The table below contains all important basic information on data processing related to the investigation of whistleblower reports such as the type of personal data required for conducting the investigation, which data we process from whom, for what purpose, on what ground, for how long and who we may transfer them to.

Categories of data subjects	1 Reporter: natural person subject to these Rules (see Section 3) who have observed any conduct in connection with Richter that is in violation of the provisions of national and supranational laws, industrial ethical regulations, the Richter Compliance Handbook, other internal rules and who bring such conduct to the attention of Richter via email or on the phone.		2 Person concerned by the report: a natural person whose conduct or omission has given rise to a report.	3 Third-party concerned by the report: a natural person who may have substantial information on the content of the report, or who is, in any way, named or referred to in the report so that they are identifiable.
Purpose of processing	To reveal, investigate and handle any reports pertaining to cases violating the applicable laws or industrial ethical regulations and Richter’s internal regulations (including the Compliance Handbook and Code of Ethics) (hereinafter: “Reports”) using the information on the illegal or allegedly illegal act or omission or other violation.			
Categories of data processed	For reports made via email : Basic identification data (name), contact details (email address, telephone number), information pertaining to the report, and other information arising during the investigation.	For reports made on the phone : Basic identification data (name), contact details (email address, telephone number), voice recording, information pertaining to the report, and other information arising during the investigation.	For all reports, regardless of the channel: Basic identification data (name), information on the violation or breach of law concerned by the report and the ensuing investigation.	For all reports, regardless of the channel: Basic identification data (name), information on gaining knowledge of the violation or breach of law concerned by the report and the ensuing investigation.

Legal ground of processing	Legitimate interest To ensure compliance with the law underlying the operation of the whistleblowing system (Directive (EU) 2019/1937 of the European Parliament and of the Council on the protection of persons who report breaches of Union law, and Act XXV of 2023 on complaints, disclosures in the public interest, and related rules on reporting abuses.		
Duration of processing	If the investigation concludes that the report is unfounded or there is no need to take further measures, we will delete the data relating to the report five years after the investigation is closed, while if any action is taken on the basis of the investigation, also including actions such as legal proceedings or disciplinary action launched against the Reporter, the data relating to the report may be processed in our Compliance Hotline until no later than the final conclusion of the proceedings launched on the basis of the report.		
Source of data	The Reporter themselves provides the personal data.	Reporter	Reporter, or even the Person concerned by the report during the investigation.
Recipients	If the conduct reported justifies the initiation of criminal proceedings or other official proceedings, Richter will arrange for forwarding the data required for initiation to the competent body.		

B. Data processor

In order to achieve the purpose of processing mentioned in the previous section, Richter involves the following **data processor** for the processing of the personal data relating to the Data Subjects, if the report is made via the VCO channel:

Data processor's name	Contact details	Scope of activities
Ernst & Young Kft.	Registered office: H-1132 Budapest, Váci út 20, Hungary Webpage: https://www.ey.com/en_hu	Development, operation, and maintenance of the VCO site

C. Joint controllership

In order to achieve the purpose of processing mentioned in Section A of this ANNEX III, Richter conducts **joint controlling** together with the following data controllers:

Joint controllers's name	Contact details	Essence of the agreement, role towards the Data Subject
Gedeon Richter Plc.'s affiliate or representative office depending on the entity which has a legal relationship with the Data Subject concerned by the report and the investigation.	Available via the webpage: https://www.gedeonrichter.com/en/richter-group	In managing reports, revealing, investigating and managing ethical infringements and breaches of law, and terminating the infringing situation, Gedeon Richter Plc. proceeds jointly, in cooperation with Gedeon Richter Plc.'s affiliate or representative office concerned by the report.

D. The Data Subjects' exercisable rights and legal remedies

Based on Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: "GDPR"), Data Subjects have the right to exercise the following data subject' rights in connection with the personal data processed by Richter, by sending your request to the email address dataprotection@richter.hu:

Data subjects' right	Is the data subjects' right exercisable based on legitimate interest?
Right of access (Art. 15 GDPR)	Exercisable
Right to rectification (Art. 16 GDPR)	Exercisable
Right to erasure (Art. 17 GDPR)	Exercisable
Right to withdraw consent (Art. 7(3) GDPR)	Not exercisable
Right to restriction of processing (Art. 18 GDPR)	Exercisable
Right to data portability (Art. 20 GDPR)	Not exercisable
Right to object (Art. 21 GDPR)	Exercisable

The table below specifies in detail the content of the data subject's rights.

Data subjects' right	Exact provision	Content
Right of access	Art. 15 GDPR	You have the right to obtain confirmation, on request, as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data processed.
Right to rectification	Art. 16 GDPR	You have the right to have incomplete personal data completed and inaccurate personal data rectified, on request.
Right to erasure	Art. 17 GDPR	You have the right to obtain the erasure of your personal data if one of the conditions listed in the relevant article of the GDPR applies.
Right to withdraw consent	Art. 7(3) GDPR	Not exercisable
Right to restriction of processing	Art. 18 GDPR	You have the right to obtain restriction of processing where any of the conditions listed in the relevant GDPR Article applies.
Right to data portability	Art. 20 GDPR	Not exercisable
Right to object	Art. 21 GDPR	You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions.

Where you as a Data Subject consider that Richter as the data controller acts illegally during processing, you have the following legal remedies.

Before turning to authority or court, we suggest and ask that you contact Richter’s Data Protection Officer by email at dataprotection@richter.hu, so that we can examine, evaluate, and resolve the situation, and provide comprehensive information, as we possess all information in connection with the processing.

Name of legal remedy	Exact provision	Content
Right to lodge a complaint with the data protection supervisory authority	Art. 77 GDPR	<p>Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with the National Authority of Data Protection and Freedom of Information (Hungarian abbreviation: “NAIH”), if the processing of personal data relating to you infringes the GDPR. You can contact NAIH in the following ways: Postal address: H-1363 Budapest, Pf. 9., registered office: H-1055 Budapest, Falk Miksa u. 9-11., Hungary; email address: ugyfelszolgalat@naih.hu; phone numbers: +36 (30) 683-5969; +36 (30) 549-6838; +36 (1) 391 1400; fax: +36 (1) 391-1410; website: www.naih.hu</p>
Right to a judicial remedy	Art. 79 GDPR	<p>Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority pursuant to Article 77, you have the right to an effective judicial remedy if you consider that your rights under the GDPR have been infringed as a result of the processing of your personal data in non-compliance with the GDPR. Proceedings against a data controller or a data processor shall be brought before the courts of the Member State where the data controller or the data processor has an establishment.</p> <p>The court shall deal with the case as a matter of priority. You can decide whether to bring the case before the regional court competent based on your residence (permanent address) or place of stay (temporary address) or the court based on Richter’s registered seat. The regional court competent based on your residence or place of stay can be found on the website http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso. The competent court based on Richter’s registered seat is the Budapest-Capital Regional Court.</p>

Should you need further information, please contact us in email at dataprotection@richter.hu.