POLPHARMA BIOLOGICS S.A.
acting under brand name “RezonBio”

THIRD PARTY CODE

Order number

PB/PC/POL/1/2025

Policy approved by the Resolution of the Management Board of Polpharma Biologics S.A. no 23/12/2025

Applicable from 23/01/2026

Rezonbio

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1. INTRODUCTION

Polpharma Biologics conducts business operations based on the highest ethical standards, guided by our value system founded on Operating Principles which are embodied in actions characterized by respect, integrity, responsibility, openness, solidarity, and collaboration.

Our mission is: “We help people live healthy lives in a healthy world”.

We are a company that operates consciously and responsibly within society and the environment in a manner that respects the rights and dignity of all people. We respect internationally proclaimed human rights and integrate sustainability principles into every aspect of our business operations and across all stages of our value chain. We operate respecting diversity and inclusivity, and we do not tolerate any form of discrimination, including but not limited to gender, age, race, or religion. We expect the same approach from our stakeholders, including our Business Partners.

We strive to identify, prevent, and mitigate potential risks and adverse human rights impacts that may be linked to our operations, products and services and value chain. Where appropriate, we take effective remedial action to stop and remedy adverse impacts that have been directly caused by our operations.

We require our Business Partners to adhere to consistent principles of conduct that are aligned with the standards and values accepted by Polpharma Biologics, regardless of their country of origin, industry, or scale of operation.

Compliance with the high ethical and social standards upheld by Polpharma Biologics, such as:

- adherence to legal requirements, including those concerning human rights protection, safety of people and information,
- compliance with ESG (Environmental, Social, and Governance) requirements and ethical business practices,
- maintaining the highest standards of employment and employee management,
- care for the natural environment and local communities, including through engagement and dialogue, and
  striving for continuous improvement in the quality of services provided, is fundamental in establishing and maintaining cooperation with our Business Partners.

This Code summarizes the key principles of conduct for Polpharma Biologics and its Business Partners. Adherence to this Code, along with the promotion of its principles and values, is an essential criterion for selecting and assessing collaboration with our Business Partners. In cases of discrepancies between applicable legal regulations in the Business Partners’ country of operation and international

standards, we expect Business Partners to adhere to the more stringent regulations. In the area of human rights, Business Partners shall always align with International Regulations.

This Third Party Code is adopted at the Polpharma Biologics Group level and is binding on all subsidiaries and affiliates. Each entity within Polpharma Biologics Group is responsible for ensuring that its Business Partners comply with the provisions of this Code.

2. INTERPRETATION

The following terms within this Code are defined as:

Third Party/Business Partner - Any external entities, including suppliers, subcontractors, service providers, consultants, clients or any other business partners.

Workers - All individuals performing work under the control or supervision of the Third Party, including Third Party Workers, subcontracted personnel, temporary workers, agency workers, apprentices, and migrant laborers, regardless of the legal basis of their employment or engagement.

International Regulations — Includes the UN Guidelines and OECD Guidelines, as well as conventions, international laws, and voluntary standards specified in the Appendix to this Code.

3. MANAGEMENT AND ETHICS

We require our Business Partners to conduct their operations in alignment with the values and ethical principles upheld by Polpharma Biologics, such as integrity, respect, solidarity, responsibility, and cooperation, as well as to manage their activities in compliance with applicable legal regulations and the expectations set out in this Code, including International Regulations.

We expect that Business Partner's Workers are provided with opportunities to continuously expand their knowledge in areas such as ethical standards in business operations, respect for human rights, care for the natural environment, and compliance with the laws governing the principles of conduct outlined in this Code.

3.1. Integrity and Responsibility in Operations

Polpharma Biologics Business Partners are obligated to adhere to the highest business standards, including compliance with the principles of fair and free competition, transparency in communication, product safety, proper handling of personal data during collection, processing, and storage, as well as protecting and maintaining the confidentiality of information shared during the course of cooperation. Business Partners must also respect intellectual property, including

personal and property copyrights, and other legal regulations and provisions related to the specific nature of their business activities.

3.2. Anti-Corruption in All Its Forms

All Business Partners are required to familiarize themselves with our anti-corruption principles as outlined in the attached Anti-Corruption Policy. Any corrupt practices, whether by Business Partners Workers or through third parties, are strictly prohibited. This applies to both public sector relationships (public sector corruption) and private sector dealings (private sector corruption).

It is absolutely prohibited to offer or give undue benefits to influence the actions or inactions of individuals to establish or maintain a business relationship. Specifically, it is unacceptable to offer or give money, equivalents of money, gifts, services, or other material or personal benefits to politicians, public officials, auditors, or employees of regulatory, certifying, or supervisory bodies that could prompt them to undertake or refrain from certain actions within their official duties.

Business Partners must not offer or give Polpharma Biologics employees gifts in the form of cash or its equivalents. Only small business gifts that comply with applicable laws, Polpharma Biologics' Anti-corruption policy and accepted customs are permitted, provided they are given on a promotional or occasional basis and do not create obligations for reciprocity or influence any actions or inactions. Where stricter anti-corruption thresholds are required by Polpharma Biologics or its clients, such thresholds shall prevail.

3.3. Conflict of Interest

It is the duty of our Business Partners to prevent and avoid situations that may create actual or perceived conflicts of interest during the process of pursuing cooperation with Polpharma Biologics and throughout the duration of such cooperation. This includes relationships arising from family ties, affinity, adoption, personal relationships, or financial or organizational involvement between representatives of the Business Partner and Polpharma Biologics. To maintain objectivity and fairness in mutual relationships, Polpharma Biologics Business Partners are required to comply with all fair competition and antitrust laws and regulations. Our Business Partners shall also employ accurate and truthful advertising. Business Partners must disclose any actual or potential conflicts of interest to Polpharma Biologics' Compliance teams at the earliest possible stage by emailing: ethics@rezonbio.com .

3.4. Risk Management, Including ESG Risks

Our Business Partners shall maintain, and continuously improve, risk management systems to address risks related to business partners, supply chains, safety, and the

potential for corruption or fraud across all areas of their operations. The solutions applied for this purpose must align with the provisions of this Code.

Business Partners shall integrate sustainability (ESG) risks into their risk management frameworks, particularly by:

- identifying and assessing actual or potential adverse impacts (effects) of Business Partner operations on sustainability issues. This includes prioritizing identified impacts and, if necessary, preventing or mitigating potential adverse impacts, remediating actual adverse impacts (those that have occurred), minimizing their scope, and providing appropriate remedies for such actual impacts.
- identifying and assessing actual or potential risks to the Business Partner's operations related to sustainability issues, preventing their occurrence, and minimizing impacts shall those risks materialize.

Sustainability issues are understood to include environmental, social, and governance (ESG) factors. For example, adverse impacts of a Business Partner's operations on sustainability might include violations of human rights or labor rights or environmental pollution (of water, air, or soil). Risks to the Business Partner's operations related to sustainability issues might include climate change (e.g., the need to temporarily suspend or limit operations during heat waves or due to food damage) or dependence on natural, human, or social resources (e.g., reliance on water availability or raw materials supplied by certain categories of vendors, or dependence on access to highly skilled workers).

Risk management in the area of sustainability shall be supported by a risk-based due diligence process, in line with the principles outlined in the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the UN Guiding Principles on Business and Human Rights, and the EU Directive 2024/1760 on Corporate Sustainability Due Diligence.

3.5. Business Continuity and Crisis Management

Polpharma Biologics Business Partners shall possess developed crisis management mechanisms for emergency or crisis situations, including in relation to the continuity of services or supplies to Polpharma Biologics.

3.6. Data Protection

Business Partners must protect and use confidential information appropriately to safeguard the privacy and confidentiality of company data, Business Partner Workers, and all stakeholders. Business Partners shall comply with applicable laws on data privacy and protection, including but not limited to 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 (the “GDPR”), ensuring the secure and lawful use of personal data. They must also proactively mitigate risks related to information security, including cybersecurity risks.

3.7. Data Integrity

Data Integrity is a fundamental component of pharmaceutical Quality Systems. Qualified and Responsible Persons, patients, customers and Authorities must rely on the data to ensure and trust the quality, safety and efficacy of medicines. Any serious breach of Data Integrity has the potential to compromise Polpharma Biologics´ products, services and reputation. Business Partners must ensure that every of their employee understand the fundamental requirements in all pharmaceutical operations, with thorough training, and are reflected in respective Business Partner’s standard operating procedures and instructions. These principles of data integrity follow most current industry standards, and ensure that data generation and throughout the entire lifecycle of data until archival, follow ALCOA++ rules: data must be Attributable, Legible, Contemporaneous, Original and Accurate ‘plus’ Complete, Consistent, Enduring, Available and Traceable.

3.8. Reporting Irregularities

Polpharma Biologics Business Partners are expected to actively promote an ethical culture and build trust within and outside their structures by providing communication channels for reporting irregularities. The systems employed for this purpose by our Business Partners shall ensure the safety and confidentiality of the information provided, including personal data. They shall also offer whistleblowers acknowledgment of their report, feedback, and protections against any retaliatory actions.

3.9. Documentation

Business partners shall maintain documentation necessary to demonstrate conformance with this Code and applicable legal obligations.

Business Partners shall prepare and maintain books and records that document accurately and in reasonable detail all matters related to business with Polpharma Biologics, accounting for all payments (including gifts, hospitality and entertainment, or anything else of value) made on behalf of Polpharma Biologics, or out of funds provided by Polpharma Biologics.

“Off-the-books” accounts and false or deceptive entries are strictly prohibited. All financial transactions related to business with Polpharma Biologics must be

documented, regularly reviewed and properly accounted for in accordance with applicable laws and internal controls. Upon justified request, Business Partners shall provide Polpharma Biologics with access to documentation relevant to transactions conducted on behalf of or funded by Polpharma Biologics, subject to applicable confidentiality and legal constraints.

Business Partners shall ensure that all relevant internal financial controls and approval procedures are followed and that the retention and archive of books and records is consistent with the Business Partner's own standards and tax and other applicable laws and regulations. More specific record retention requirements may be agreed between the parties.

3.10. Sustainable Development

Considering international commitments to sustainability, including the United Nations' 2030 Agenda (17 Sustainable Development Goals), efforts to combat climate change under the Paris Agreement, and applicable regional or national (such as EU law or equivalent domestic frameworks), Polpharma Biologics expects Business Partners to actively adopt sustainability principles. Business Partners are expected to minimize their negative impact on the climate and environment and take steps to protect these resources while avoiding and addressing adverse impacts on human rights (including labor rights). Business Partners are also encouraged to improve service quality, contribute to building strong economies, and prioritize the well-being and safety of communities.

Key measures in minimizing the environmental impact of Business Partner operations include scientifically-based actions to mitigate climate change, reducing carbon footprints (across all scopes, including Scope 3), lowering greenhouse gas emissions, protecting biodiversity and ecosystems, preventing overexploitation, erosion, and contamination of natural resources (including deforestation and forest degradation), promoting sustainable use and conservation of water and marine resources, transitioning to a circular economy, and preventing and controlling pollution of soil, water, and air.

3.11. Responsible minerals

We expect our Business Partners to make reasonable efforts to avoid using raw materials in their products that originate from conflict-affected and high-risk areas and contribute to human rights abuses, corruption, the financing of armed groups or similar negative impacts. We require our Business Partners to be transparent about the sourcing practices of these minerals, from the point of extraction to the point of delivery. Business Partners commit to refraining from any action which contributes to the financing of conflict and commit to complying with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

Business Partners shall:

- Provide transparent information about the source of 3TGs (tin, tantalum, tungsten and gold) in products, components or materials supplied to Polpharma Biologics by our Business Partners (including the smelter or refiner where such 3TGs were processed and the country of origin of the 3TGs where possible through reasonable means)
- Cooperate with Polpharma Biologics in its due diligence process and in responding to its requests for information relating to minerals used in our products
- Provide, upon request, reasonable evidence of the Business Partner's performance of similar due diligence with respect to any of their suppliers or sub-contractors involved in the production of the materials or products supplied to Polpharma Biologics or any components of those materials or products
- Work with Polpharma Biologics to assess opportunities for alternative sources where 3TG responsible minerals are identified.

4. EMPLOYMENT CONDITIONS AND WORKERS' RIGHTS

Polpharma Biologics Business Partners are required to respect international standards for the protection of human rights as defined in International Regulations and to support their respect and prevent violations throughout their value chain as part of their operations.

4.1. Child Labor

The use of any form (directly or indirectly) of child labor by our Business Partners is strictly prohibited. The minimum age of Polpharma Biologics Business Partners' Workers must comply with the applicable laws in the Business Partner's country and must not conflict with compulsory education requirements and thus shall not be less than 15 years, unless the exceptions recognized by the International Labour Organization (ILO) apply. The employment of minors for work that is hazardous to their health or safety is strictly forbidden.
If Children are found engaged in prohibited Child Labor, Business Partners shall put in place a suitable plan to support the child, which may involve removing the child from the workplace while continuing to pay salary and the cost of formal or vocational training, accommodation, or other costs as necessary, to the child until adulthood. These policies and programs shall conform to the provisions of the relevant ILO standards.

4.2. Freedom of Employment

We oppose the use of slave labor, forced labor, and all forms of human trafficking. Business Partner Workers must be employed voluntarily and must be allowed to terminate their employment or collaboration in accordance with the applicable laws and notice periods. Specifically, our Business Partners must not retain or restrict access to personal documents of Business Partner Workers, such as identification cards, passports, driving licenses, certificates of professional qualifications, or other work-related documents. Business Partners must also ensure fair, dignified, and timely payment of wages. Charging recruitment fees and retaining cash deposits is prohibited.

Our Business Partners are expected to oversee all steps of the recruitment process and carry out due diligence at every stage of the labor migration process.

It is required to ensure that foreign migrant Workers have access to grievance mechanisms in a language they understand throughout the entire labor migration process that give effective access to remedy. Our Business Partners shall ensure the safe and dignified return of migrant Workers to their countries of origin at any time, without fear of reprisal or penalties and without incurring extraordinary debt.

4.3. Equality and Non-Discrimination

We expect our Business Partners to create an open and safe working environment and to treat all Business Partner Workers with due respect. Any form of degrading or humiliating treatment, bullying, harassment, intimidation, exclusion, or violence is unacceptable. Similarly, discrimination of any kind in the workplace is prohibited, particularly on the grounds of gender, age, origin, nationality, religion, sexual orientation, appearance, health, physical ability, or any other aspect of diversity among Business Partner Workers.

Business Partner's employment policies shall reflect these principles, be implemented transparently, and be effectively communicated to Business Partner Workers. Additionally, clear channels shall be in place for reporting any violations of these principles or misconduct that permits Workers to express their concerns about the workplace without fear of retribution or losing their jobs.

4.4. Employment Terms, Wages, and Working Hours

Polpharma Biologics expects its Business Partners to recruit and employ Workers based on principles of openness, equality, and transparency. Employment relationships shall be established in accordance with applicable national laws and best industry practices.

Business Partners must ensure that Workers are employed under fair and lawful conditions, including clear communication of employment terms, remuneration, and working hours in a language they understand prior to the commencement of work.

These terms must comply with applicable labor laws and, where relevant, collective agreements.

All compensation shall be fair, timely, and legally compliant. Deductions from wages may only be made in accordance with local law. Equal pay for equal work must be promoted, ensuring that all Workers performing work of equal value receive equal remuneration, regardless of gender or other protected characteristics.

Business Partners shall maintain accurate records of working hours and wages. Overtime must be voluntary and compensated in accordance with applicable laws or collective agreements. Where no such provisions exist, Business Partners shall ensure that overtime does not compromise the health and safety of Workers.

Workers shall be entitled to rest periods, time off, and leave in accordance with national labor laws and international standards, including those set by the International Labour Organization (ILO).

Business Partners must not circumvent labor or social security obligations through the use of subcontracting, temporary contracts, or apprenticeship schemes that do not genuinely aim to impart skills or provide regular employment.

4.5. Special Protections

Polpharma Biologics Business Partners must ensure special protections required under applicable laws and International Regulations for Business Partner Workers with disabilities, pregnant women, and parents of young children. Where possible, Business Partners shall strive to implement standards exceeding legal requirements, promoting the professional activation of these categories of Business Partner Workers.

4.6. Freedom of Association

Polpharma Biologics Business Partner Workers must have the right to freely communicate with their superiors regarding working conditions. Workers shall have the right to join associations, unions, engage in collective bargaining, and participate in information sharing and consultations. They shall also be able to influence and improve working conditions and the workplace environment within the timeframe, conditions, and cases specified by national laws. We expect our Business Partners to enable their Workers to exercise these rights and freedoms without fear of discrimination, punishment, humiliation, or any retaliatory actions.

Workers shall know how to raise issues if they wish to do so. Where collective agreements are in place, they are communicated to all Workers in a language they can understand.

4.7. Continuous Professional Development

Polpharma Biologics Business Partners must ensure equal access to opportunities for training and professional development for Business Partner Workers, including support for long-term career development.

4.8. Communication of Workers' Rights and Employment Principles

Workers of our Business Partners must be effectively informed about their rights, safety regulations, work ethics, principles of conduct, and employment rules, including those concerning remuneration, promotions, professional development opportunities, and the modification or termination of their employment.

4.9. Responsibility for the Value Chain

We expect our Business Partners to adopt an active stance in respecting international human rights standards and ensuring that the above employment principles are observed by entities participating in the Business Partner's value chain.

According to the definition provided in Delegated Regulation 2023/27721, the value chain encompasses the full range of activities, resources, and relationships associated with an entity's business model and its external environment. This includes actions, resources, and relationships used and relied upon by the entity to create its products or services, from conception to realization, consumption, and disposal. The value chain includes entities upstream and downstream from the organization. Entities upstream (e.g., suppliers) provide products or services used in the development of the entity's products or services. Entities downstream (e.g., distributors, customers) receive products or services from the organization.

5. OCCUPATIONAL SAFETY AND HYGIENE

Polpharma Biologics Business Partners are required to provide healthy and safe working conditions.

5.1. Working Conditions

Polpharma Biologics Business Partners must provide Business Partner Workers with safe and hygienic working conditions that comply with legal requirements and industry standards. Business Partners must ensure Business Partner Workers have access to safe and technically sound workplaces, machinery, tools, and equipment

necessary for their work, as well as collective and individual protective materials and resources. Special attention shall be given to protecting Business Partner Workers from chemical, biological, and physical hazards. Business Partners are also required to identify and monitor risks to implement effective preventive measures.

5.2. Safety in Production Processes

Polpharma Biologics Business Partners are required to manage production processes in compliance with applicable regulations and safety standards. This includes systematic risk analysis (both occupational and process), documentation of findings, and implementation of necessary measures to mitigate risks, particularly in hazardous work environments.

5.3. Prevention Through Education

We expect our Business Partners to provide regular training to Business Partner Workers on safety and the identification and mitigation of potential risks. Business Partner Workers shall receive clear information about identified hazards, emergency plans, and crisis response procedures. If Business Partner Workers perform work at Polpharma Biologics facilities, the Business Partner must monitor the applicable workplace safety and fire protection standards in Polpharma Biologics facilities and communicate these to Business Partner Workers in accordance with information provided by Polpharma Biologics. Business Partner Workers or individuals acting on behalf of the Business Partner for Polpharma Biologics must adhere to the workplace safety and fire protection standards in force at Polpharma Biologics facilities. Business Partners shall minimize the potential impact of any emergency by implementing suitable emergency plans and response procedures.

5.4. Promoting Active Participation and Health Prevention

Our Business Partners shall promote the active participation of Business Partner Workers in ensuring safe working conditions and fostering health prevention measures, especially in counteracting harmful factors specific to individual workstations.

6. PRODUCT SAFETY AND QUALITY

Polpharma Biologics Business Partners are required to meet all safety and quality requirements for products, treating these aspects as top priorities.

6.1. Safety and Quality Requirements and Regulations

Suppliers of products at all stages of production, storage, transportation, and sale are required to adhere to applicable laws, international standards, including Good Manufacturing Practices (GMP) and Good Distribution Practices (GDP), as well as specific contractual requirements with Polpharma Biologics. All actions by Polpharma Biologics Business Partners that may impact the safety and quality of Polpharma Biologics' products are subject to strict oversight and regulations.

6.2. Commitment to Process Improvement

We expect our Business Partners to actively seek ways to improve processes related to sourcing, production, storage, and transportation to enhance product quality, optimize the supply chain, positively impact the economy, and meet the requirements outlined in this Code.

6.3. Research

Polpharma Biologics Business Partners conducting research involving humans or animals are required to conduct such research responsibly, adhering to applicable legal requirements, ethical standards, and best practices.

6.3.1. Research Involving Humans

Polpharma Biologics Business Partners conducting research involving humans on our behalf are required to comply with applicable laws and universally accepted international ethical and scientific standards, including the Declaration of Helsinki and Good Clinical Practice (GCP).

6.3.2. Research Involving Animals

Animal research by Polpharma Biologics Business Partners must only be conducted when legally required or when no scientifically justified and universally accepted alternative methods exist. Our Business Partners are required to adhere to legal requirements and internationally recognized standards, such as the "International Guiding Principles for Biomedical Research Involving Animals" by the Council for International Organizations of Medical Sciences (CIOMS). Business Partners must treat animals humanely, minimizing stress, fear, and pain as much as possible.

7. ENVIRONMENTAL AND CLIMATE IMPACT

Polpharma Biologics Business Partners shall operate responsibly toward the natural environment and future generations by striving to minimize the impact of their activities and demonstrating a proactive approach to environmental and climate challenges. Our Business Partners shall allow Polpharma Biologics to report their environmental sustainability data related to products and/or services procured by Polpharma Biologics to third-parties in an anonymized form, as may be required for the purposes of external reporting, benchmarking and auditing.

7.1. Conscious Decisions and Active Approach

We expect our Business Partners to operate based on goals and strategies that integrate sustainability principles, social responsibility, and the highest ethical standards. Polpharma Biologics Business Partners shall make every effort to assess and monitor all areas of environmental and climate impact comprehensively and set goals to reduce their footprint. This includes actions such as reducing carbon footprints, limiting high-emission technologies and products, and sustainably exploiting natural resources, particularly forests, while managing waste generation. Business Partners shall also consider environmental criteria when making decisions about development, technological process optimization, purchasing, and partnerships.

7.2. Environmental Requirements and Regulations

Polpharma Biologics Business Partners must comply with legal requirements, regulations, international agreements, and market standards and best practices regarding environmental protection and climate change prevention. Business Partners must implement rational natural resource management systems and hold all current permits and licenses necessary for their operations. These documents must be available for review upon request by Polpharma Biologics or its authorized representatives. Business Partners must also fulfill all administrative and registration obligations related to environmental protection and climate change prevention as required by law.

7.3. Emission of Pollutants into the Environment

Polpharma Biologics Business Partners' methods for managing pollutant emissions (including emissions to air, water, and soil) must ensure monitoring, minimization, and continuous improvement of emission management processes. Business Partners

shall reduce environmental impacts and risks through effective preventive and intervention measures.

7.4. Protection of Natural Resources

The use of natural resources by Polpharma Biologics Business Partners must be economical and efficient, ensuring their viability for long-term use while respecting biodiversity, ecosystems, and the rights of other entities, including local communities, to access the same resources. Business Partners shall aim to minimize, or preferably eliminate, the negative impacts of their activities on natural resources through continuous information collection, documentation, data analysis, risk assessment, and process optimization. They shall also use substances, materials, techniques, and technologies that have the least negative environmental and social impact possible. Business Partners shall have processes and systems in place to prevent and mitigate any spills and releases to the environment which substantially impair the natural foundations for the preservation and production of food or prevent access to clean drinking water, impede or destroy the access to sanitary facilities or harm the health of a person. They shall remedy any impacts that are caused.

8. COMPLIANCE VERIFICATION AND BUSINESS PARTNER SUPPORT

Polpharma Biologics reserves the right to audit Business Partners (including their subcontractors, value chains, services, or products relevant to Polpharma's operations) to assess the effectiveness of implementing and adhering to the requirements of this Code. Business Partners agree to cooperate with Polpharma Biologics (or its authorized representatives) in implementing and executing the provisions of this Code or in conducting audits. Business Partners and Polpharma Biologics may agree on the cost-sharing arrangement for audits and the rules and conditions for the Business Partner's use of audit results for collaboration with other entities. The audit may be performed by a third party on PB request and PB guaranties confidentiality of this process. Failure to comply with Polpharma Biologics' requirements outlined in the Code may result in the termination of agreements with the Business Partner.

In the event of repeated or material non-compliance with this Code, Polpharma Biologics may initiate a formal escalation process. This may include written warnings, corrective action plans, temporary suspension of cooperation, or termination of the agreement. The escalation process shall be overseen by Compliance team and documented in accordance with internal procedures.

Polpharma Biologics expresses its willingness to support Business Partners in implementing the provisions of this Code, particularly in implementing due diligence processes and integrating sustainability risks into risk management

systems. Such support may include conducting training sessions or providing document templates.

9. TRADE SANCTIONS AND EXPORTS CONTROLS

Business Partners shall identify and comply with applicable trade sanctions and export control laws, including but not limited to US, EU, Great Britain and Swiss trade sanctions laws. Polpharma Biologics does not engage with persons or companies that have been placed by governments on sanctioned party lists.

Business Partners shall:

- Confirm that neither they nor their affiliated companies, shareholders or directors have been previously, or are currently, placed on one of the following restricted parties lists: the U.S. List of Specially Designated Nationals ("SDNs") and Blocked Persons [19], maintained by the U.S. Treasury Department Office of Foreign Assets Control; the Debarred List and non-proliferation sanctions lists maintained by the U.S. State Department [20]; the EU Consolidated List of Designated Parties [21]; and the Sanctions Embargoes List of Switzerland [22].
- Confirm they are not currently owned, directly or indirectly, 50% or more, individually or in the aggregate, by one or more SDNs.
- Immediately inform Polpharma Biologics by email (using the email address: ethics@rezonbio.com) if during the course of dealings with Polpharma Biologics: (i) they, their affiliated companies, shareholders or directors are placed on one of the restricted parties lists referenced above; or (ii) they become owned 50% or more, individually or in the aggregate, by one or more SDNs.

10. COMMUNICATION AND REPORTING MISCONDUCT

Polpharma Biologics strives to ensure compliance with this Third Party Code by all its Business Partners and Business Partner Workers. If there are questions or concerns regarding the Code's requirements or if Business Partners wish to inform Polpharma Biologics about implemented solutions, they are encouraged to contact: **ethics@rezonbio.com**.

Any cases of irregularities, incidents, or violations of the Code shall be reported to Polpharma Biologics' Compliance team, which oversees the implementation of these principles within Polpharma Biologics.

All our stakeholders are encouraged to contact us via:

a. **E-mail: ethics@rezonbio.com**

Business Partners shall encourage their Workers to report internal organizational issues related to unethical conduct primarily to the Business Partner for whom they work or collaborate, using mechanisms provided by that Business Partner. To this end, Business Partners are expected to implement operational-level grievance mechanisms, such as workplace grievance mechanisms or third-party complaint systems, with appropriate processes that include: timelines for processing complaints; response procedures for unresolved grievances or those of significant severity; defined scope and powers of operational-level grievance mechanisms; stakeholder consultations to adapt mechanisms to cultural conditions and accessibility; allocation of adequate resources and personnel for operational-level grievance mechanisms operations; monitoring and tracking actions taken based on grievances.
Violations of this Code can also be reported directly to Polpharma Biologics. Polpharma Biologics ensures the safety and confidentiality of all information provided, including personal data, for all reports submitted through the communication channels specified above. When possible and appropriate, Polpharma Biologics will provide feedback to the whistleblower regarding the reported issue, including how it has been addressed.

11. INFORMATION DISCLOSURE

Business Partners are required to provide Polpharma Biologics with information and data, within the scope and timelines specified by Polpharma Biologics, related to sustainability (ESG) issues. This information may be necessary for Polpharma Biologics's sustainability reporting in compliance with Chapter 6c (Sustainability Reporting) of the Accounting Act of September 29, 1994, and Directive (EU) 2022/2464 of the European Parliament and of the Council of December 14, 2022, amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC, and Directive 2013/34/EU regarding corporate sustainability reporting.

Polpharma Biologics may require Business Partners to undergo third-party audits or provide independent verification of ESG, compliance, or quality-related claims. Business Partners shall cooperate fully and bear the cost of such verification where non-compliance is suspected or confirmed.

The terms and conditions for providing the above-mentioned information and data, including confidentiality agreements, may be specified in a contract between the Business Partner and Polpharma Biologics.

12. ATTACHMENTS

12.1. Information and documents referred to in this Code

12.2. Anti-Corruption Policy

13. DOCUMENT SPECIFICATION

Order Number	PB/PC/POL/1/2025	
Approval of the Management Board	Document approved by the Management Board of Polpharma Biologics S.A. by a resolution no 23/12/2025	
Effective date	23/01/2026	
Version	1	Only the versions available on the Intranet sites are up-to-date. Check if you are using the current version of the document.

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INFORMATION AND DOCUMENTS REFERRED TO IN THIS CODE

International Bill of Human Rights, comprising:

Polpharma Biologics Code of Conduct

Available to download at: https://rezonbio.com

1. **Universal Declaration of Human Rights**

PL: https://www.ohchr.org/en/human-rights/universal-declaration/translations/polish-polski

EN: https://www.un.org/en/about-us/universal-declaration-of-human-rights

2. **International Covenant on Civil and Political Rights**

PL: https://www.amnesty.org.pl/wp-content/uploads/2016/04/Miedzynarodowy_Pakt_Praw_Obywatelskich_i_Politycznych.pdf EN: https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights

3. **International Covenant on Economic, Social, and Cultural Rights**

PL: https://www.amnesty.org.pl/wp-content/uploads/2016/04/Miedzynarodowy-Pakt-Praw-gosp-spol-kult.pdf

EN: https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-economic-social-and-cultural-rights

European Convention on Human Rights

PL:https://www.echr.coe.int/documents/d/echr/convention_pol

EN: www.echr.coe.int/Documents/Convention_ENG.pdf

Convention on the Rights of the Child

PL: https://www.gov.pl/web/rodzina/konwencja-o-prawach-dziecka

EN: https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child

Declaration of Helsinki

PL: https://nil.org.pl/uploaded_files/art_1585807090_deklaracja-helsinska-przyjeta-na-64-zo-wma-pazdziernik-2013-pelny-tekst.pdf

EN: https://www.wma.net/policies-post/wma-declaration-of-helsinki-ethical-principles-for-medical-research-involving-human-subjects/ ?

UN Guiding Principles on Business and Human Rights („UNGPs")

PL: https://pihrb.org/wp-content/uploads/2021/09/Wytyczne-ONZ-UNGPs-BHR-PL_web_PIHRB-2.pdf

EN: https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf

OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023 edition)

PL: https://www.oecd.org/pl/publications/2023/06/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_a0b49990.html EN: https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html

ILO Declaration on Fundamental Principles and Rights at Work and Related Core Conventions

PL: https://www.ilo.org/media/267781/download

EN: https://www.ilo.org/ilo-declaration-fundamental-principles-and-rights-work

1. **Convention No. 29 on Forced or Compulsory Labor:**

PL: https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU19590200122 EN: https://www.ilo.org/media/21026/download

2. **Convention No. 87 on Freedom of Association and Protection of the Right to Organize:** PL: https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU19580290125 EN: https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C087

3. **Convention No. 98 on the Right to Organize and Collective Bargaining:**

PL: https://www.mop.pl/doc/html/konwencje/k098.html

EN: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_INSTRUMENT_ID:312243

4. **Convention No. 100: Equal Remuneration for Men and Women Workers for Work of Equal Value**:

PL: https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU19550380238

EN: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_Ilo_Code:C100

5. **Convention No. 105: Abolition of Forced Labor:**

PL: https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU19590390240

EN: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C105

6. Convention No. 111: Discrimination in Respect of Employment and Occupation:
PL: https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU19610420218
EN: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C111

6. Convention No. 138: Minimum Age for Admission to Employment:
PL: https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU19780120053
EN: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138

7. Convention No. 182: Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour: PL: https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20041391474

EN: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182

Transforming our World: The 2030 Agenda for Sustainable Development PL: http://www.un.org.pl/fi les/170/Agenda2030PL_pl-5.pdf

EN: https://sustainabledevelopment.un.org/post2015/transformingourworld/publication

Paris Agreement
PL: https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20170000036 EN: https://unfccc.int/sites/default/files/english_paris_agreement.pdf

Directive 2022/2464 on Corporate Sustainability Reporting (CSRD)
PL: https://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX%3A32022L2464
EN: https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32022L2464

Regulation 2020/852 on the Establishment of a Framework to Facilitate Sustainable Investments (EU Taxonomy PL: https://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX%3A32020R0852

EN: https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32020R0852

Regulation 2023/1115 on EU Market Access and Export of Products Associated with Deforestation (EUDR (European Union Deforestation Regulation))
PL: https://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX:32023R1115
EN: https://eur-lex.europa.eu/eli/reg/2023/1115/oj

Council for International Organizations of Medical Sciences (CIOMS)
PL: [Polska wersja językowa nie jest dostępna/Polish language version not available]
EN: www.cioms.ch/images/stories/CIOMS/IGP2012.pdf

Good Clinical Practice (GCP)
PL:https://www.gcppl.org.pl/Portals/2/advertisings/ICH_GCP_E6_R2_wersja_polska_FINAL.pdf EN: https://database.ich.org/sites/default/files/E6_R2_Addendum.pdf

Good Manufacturing Practice (GMP)
PL:https://sip.lex.pl/akty-prawne/dzu-dziennik-ustaw/wymagania-dobrej-praktyki-wytwarzania-18243680 EN: www.ec.europa.eu/health/documents/eudralex/vol-4/index_en.htm

Good Distribution Practice (GDP)
PL: https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20150000381
EN:https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52013XC1123%2801%29&qid=1701957204800

Data integrity

-	MHRA GXP Data Integrity Guidance and Definitions; Revision 1: March 2018
-	WHO Guidance Document on Good Data and Record Management Practices
-	MHRA GMP Data Integrity Definitions and Guidance for Industry, March 2015
EMA Annex 11	Computerised Systems
EMA/INS/GCP/112288/2023	Guideline on computerised systems and electronic data in clinical trials
EMA/INS/GCP/467532/2019	Notice to sponsors on validation and qualification of computerised systems used in clinical trials
EMA/INS/GCP/856758/2018	Guideline on the content, management and archiving of the clinical trial master file (paper and/or electronic)
FDA CFR 21 Part 11	Electronic Records; Electronic Signatures
FDA-2018-D-3984	Data Integrity and Compliance with Drug CGMP