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## CODE OF CONDUCT

### 1. INTRODUCTION

#### 1.1. Purpose

The Advanz Pharma Group (“**Advanz Pharma**” or the “**Company**”) and its affiliates are committed to maintaining the highest ethical standards in their dealings with all parties involved in the Company’s business activities, including employees, vendors, contractors, and third parties. This Code of Conduct (the “**Code**”) which has been approved by Advanz Pharma’s CEO and the Advanz Pharma Board of Directors has been put in place to summarize the key ethical and legal principles that everyone at Advanz Pharma is required to adhere to. While this Code does not cover every issue that may arise, it is intended to promote honest and ethical conduct among all individuals employed by or associated with Advanz Pharma.


#### 1.2. Scope

Every employee, officer, director, consultant, and contract worker (full time or temporary) is expected to read, understand, and comply with this Code and all other applicable laws, regulations, and Company policies.

Individuals acting on behalf of Advanz Pharma who engage a third-party vendor, consultant, or contract worker (collectively, “**Third Party Vendor**”) are responsible for:

- Communicating this Code and its requirements to the Third Party Vendor;
- Confirming the Third Party Vendor agrees to abide by the Code’s requirements;
- Monitoring the Third Party Vendor to verify compliance with the Code’s requirements; and
- Escalating instances of non-compliance by a Third Party Vendor to the Advanz Pharma Compliance officer.

This Code and the spirit of its purpose apply to all Advanz Pharma locations, affiliates, and subsidiaries. However, to the extent that some Advanz Pharma affiliates and subsidiaries may operate in varying industry segments or jurisdictions, this Code may be supplemented by additional policies and/or processes to address specific regulatory requirements or local laws. Employees who would like to seek further information or have questions on the information contained in the Code should speak with their supervisor or Compliance Officer.

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## 2. HUMAN RIGHTS STANDARDS

Advanz Pharma recognises that its business activities may impact human rights, particularly in relation to working and living conditions and the well-being of local communities. The Company is committed to upholding the United Nations Guiding Principles on Business and Human Rights and adhering to internationally recognised human rights standards, including the International Bill of Human Rights and the International Labour Organisation’s (ILO) Declaration on Fundamental Principles and Rights at Work.

Advanz Pharma seeks to prevent and mitigate adverse human rights impacts in its global operations and remediate any such impacts if they occur. The Company prioritises its human rights efforts based on saliency, addressing risks that could have the most severe impact on individuals, including patients, colleagues, workers in its supply chain, and the communities in which the Company operates. This approach is informed by international standards, industry best practices, and expert assessments.

Advanz Pharma is committed to addressing modern slavery, including forced labour, human trafficking, and other forms of exploitation, in its operations, supply chains, and business relationships. This includes compliance with all applicable modern slavery laws and the implementation of measures to identify, prevent, and mitigate related risks. Suppliers, partners, and stakeholders are required to adhere to these principles as outlined in Advanz Pharma’s policies, agreements, and processes.

## 3. WORKPLACE STANDARDS

### 3.1. Overview


Advanz Pharma recognizes that its people are a valuable asset and values individuals who are ethical, innovative, and dedicated. The Company aims to attract and retain top talent by offering competitive compensation, meaningful growth opportunities, and a diverse, inclusive workplace.

### 3.2. Equal Opportunity

Advanz Pharma is committed to providing equal opportunity in employment to all employees and applicants. This commitment applies to recruitment, hiring, employment, and employment-related decisions (including, but not limited to, hiring, firing, workforce reductions, work assignments, transfers, promotions, wage/salary adjustments, and/or bonuses). Advanz Pharma is also committed to complying with all applicable laws regarding nondiscrimination in employment. Advanz Pharma provides a discrimination-free work environment for all employees, regardless of race, color, religion, sexual orientation, age, gender identity or gender expression, national origin, citizenship, ancestry, marital status, disability, genetic information, veteran status, or other characteristics protected by applicable laws.

### 3.3. Discrimination and Harassment

Advanz Pharma respects diversity and the personal dignity of its employees. Advanz Pharma employees are expected to treat all colleagues with respect and dignity. As such, Advanz Pharma strives to ensure that the Company’s work environment is free of discrimination and harassment.

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Discrimination is defined as the adverse treatment of an individual based on race, color, religion, gender, sexual orientation, age, gender identity, gender expression, national origin, citizenship, ancestry, marital status, disability, genetic information, veteran status, or other characteristic protected by applicable laws, rather than individual merit.


Advanz Pharma will not tolerate any form of harassment, whether physical, verbal, or visual.

Harassment is defined as any action that inappropriately or unreasonably creates an intimidating, hostile, uncomfortable or offensive work environment or unreasonably interferes with an individual's ability to perform the duties or responsibilities of their employment.

Employees should report any type of discrimination or harassment immediately to their functional area manager, Human Resources Department, Legal Department, Global Compliance Officer, or the Compliance Hotline.

**3.4. Drugs and Alcohol**

Advanz Pharma prohibits the use of illegal drugs and the abuse of alcohol and/or over-the-counter or prescription drugs. This allows an employee's productivity and efficiency to remain at the highest level of performance and keeps a safe working environment. All employees are prohibited from working in Company facilities, operating a Company vehicle or a vehicle subsidized by the Company, or conducting Advanz Pharma business if they are under the influence of or impaired by alcohol or drugs. Occasionally, alcohol may be served in connection with an Advanz Pharma-sponsored function or event and if served, must be consumed responsibly.

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Advanz Pharma is committed to providing a safe and healthy working environment to its employees through the adherence to applicable health and safety laws. Any employee who is aware of any conditions or practices in the workplace that pose a threat to health, safety, or the environment is responsible for reporting this to their functional area manager, Human Resources Department, Legal Department, Global Compliance Officer, or the Compliance Hotline immediately.

## 4. MARKETPLACE STANDARDS

### 4.1. Overview

Advanz Pharma’s reputation for integrity and excellence requires careful adherence to all applicable laws and regulations as well as commitment to the highest standards of conduct of corporate and personal integrity. Productivity is maximized when employees act ethically, responsibly, and professionally. Advanz Pharma expects all employees to conduct Company business in an ethical manner.

Advanz Pharma operates in a highly regulated industry and is subject to the laws of various countries, provinces, states, and jurisdictions; some laws may also apply across borders. Wherever an employee conducts Company business, the employee should know the laws, policies, and work requirements that apply to that location. If local laws are more restrictive than Company policies, the employee should conduct their activities in accordance with the more restrictive requirements.


There may be situations where the ethical or legal course of action may be unclear. In such case, employees are expected to seek guidance by speaking with their supervisor or the Global Compliance Officer.

### 4.2. Compliance with Laws, Regulations and Industry Codes

Advanz Pharma employees shall abide by applicable laws and regulations in the countries where Advanz Pharma operates or otherwise conducts business. This includes, but is not limited to, laws and regulations that prohibit bribery and corruption or impose trade sanctions or protect privacy rights.

Advanz Pharma’s culture of compliance helps ensure the Company is in compliance with applicable laws (national, regional, provincial, or local). Each employee must strive to fully understand which laws pertain to their area of work and what is required to be in compliance with these laws. Since the laws are numerous and complicated, this Code does not include a summary of every relevant law. Employees who have any questions or concerns about a particular law, this Code, or any other Company policy, should discuss their questions or concerns with their supervisor or the Global Compliance Officer.

While employees are not expected to have in-depth knowledge of all applicable laws and regulations, employees should understand the underlying principles and apply them to their activities. Examples of laws and the principles that govern Advanz Pharma’s business are outlined below:

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**Anti-Bribery and Anti-Corruption Laws:** These laws prohibit bribery through the provision of anything of value to foreign government officials, and/or commercial bribery to gain or retain business or favorable treatment, and carry significant penalties for violations. Advanz Pharma prohibits the payment of any bribes regardless of recipient type and prohibits facilitation payments (even if otherwise permissible by law). All employees must keep accurate books and records, and Advanz Pharma must have an adequate system of internal accounting controls. Applicable laws in this category include:

- Canada’s Corruption of Foreign Public Officials Act
- The UK Bribery Act 2010
- The U.S. Foreign Corrupt Practices Act (FCPA)
- Australia’s Criminal Code Act 1995 (Part 10.2 – Bribery of Foreign Public Officials)
- The EU’s Directive (EU) 2017/1371 on fraud and corruption involving EU funds

**Anti-Facilitation of Tax Evasion:** Advanz Pharma maintains a zero-tolerance policy against the facilitation of tax evasion, whether under UK law or the law of any other jurisdiction. Under the Criminal Finances Act 2017, Advanz Pharma is legally required to prevent the facilitation of tax evasion by associated persons. An “associated person” includes employees, officers, directors, contractors, agents, consultants, third-party representatives, and business partners acting for or on behalf of Advanz Pharma. Advanz Pharma employees and associated persons must not knowingly facilitate tax evasion by any third party or engage in transactions that: (i) cause Advanz Pharma to commit a tax evasion offence; or (ii) facilitate tax evasion by a third party. Failure to comply may result in disciplinary action, up to and including termination of employment, and potential criminal prosecution for both the individual and the Company. Further details on Advanz Pharma’s approach to preventing the facilitation of tax evasion are outlined in Schedule 1.

**Failure to Prevent Fraud:** Section 199 of the Economic Crime and Corporate Transparency Act 2023 (ECCTA) introduces a new corporate criminal offence for failing to prevent fraud. This offence applies to organisations where fraud is committed by an employee or any “associated person” (including officers, consultants, agents, subsidiaries, third-party representatives, or business partners) who provides services for or on behalf of Advanz Pharma, with the intention of benefiting Advanz Pharma or its clients. Failure to comply may result in disciplinary action, up to and including termination of employment, and potential criminal prosecution for both the individual and the Company. Further details on Advanz Pharma’s approach to preventing the facilitation of fraud are outlined in Schedule 2.

**Anti-Kickback Statute (AKS):** AKS laws prohibit anyone from offering, paying, soliciting, or receiving anything of value (including a kickback, bribe, or rebate) in order to directly or indirectly, implicitly or explicitly, reward past prescribing or induce future prescribing, purchase, use, or recommendation of any item or service reimbursed under a federal or state healthcare program, or to unlawfully influence regulatory, pricing,

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formulary, or reimbursement decisions and/or gain or improve access to Healthcare Professionals (“HCPs”).

**False Claims Act (FCA):** The FCA in the US protects the federal government from false or fraudulent claims for payment. Violations of this law include providing false records or statements to obtain payment from the government or causing a third party to submit a false claim to the government. This statute has been used to prosecute pharmaceutical companies for encouraging prescribers to prescribe products for unapproved uses or for providing alleged kickbacks leading to improper reimbursement by federal healthcare programs such as Medicare and Medicaid.

**Australia – Therapeutic Goods Act 1989 and Medicines Australia Code:** In Australia, the Therapeutic Goods Act 1989 and the Medicines Australia Code of Conduct regulate pharmaceutical advertising, promotional practices, and engagement with healthcare professionals. These frameworks prohibit misleading conduct and require transparency around transfers of value.

**Canada – Food and Drugs Act and Health Canada Guidance:** In Canada, the Food and Drugs Act, along with Health Canada’s Guidance Documents for Advertising, governs claims related to therapeutic products and sets clear expectations for truthful, evidence-based promotion.


**UK – Human Medicines Regulations 2012 and ABPI Code:** In the UK, the Human Medicines Regulations 2012 and the ABPI Code of Practice regulate how prescription medicines may be promoted and how pharmaceutical companies interact with healthcare professionals and organizations.

**General Data Protection Regulation (GDPR):** In the EU, the GDPR requires the protection of personal data from the EU that is processed and/or used by an organization. It requires organizations to inform, and in some cases gain consent of, the individual before collecting and/or using their information and to provide transparency around the use of such data.

**UK GDPR and Data Protection Act 2018:** Following Brexit, the UK implemented its own version of the GDPR through the UK Data Protection Act 2018, which mirrors the core requirements of the EU regulation but applies independently to UK data subjects.

**Canada – PIPEDA:** Canada’s Personal Information Protection and Electronic Documents Act (PIPEDA) governs how private-sector organizations handle personal information. It requires that personal data be collected and used fairly and securely, with appropriate individual consent.

**Health Insurance Portability and Accountability Act (HIPAA):** In the US, HIPAA, as amended by the Health Information Technology for Economic and Clinical Health (“HITECH”) Act, addresses the security and privacy of health information, who is responsible for maintaining the security and privacy of such information, and who may access and/or use such information. Violations can lead to severe penalties including criminal and/or civil fines and/or imprisonment.

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**Australia – Privacy Act 1988:** Australia’s Privacy Act 1988, including the Notifiable Data Breaches Scheme, governs the handling of personal information and requires companies to notify individuals and the regulator in the event of a serious data breach.

**HHS-OIG Compliance Program Guidance for Pharmaceutical Manufacturers:** The Office of Inspector General of the Department of Health and Human Services (“HHS-OIG”) in the US has developed guidelines for pharmaceutical manufacturers to consider when developing, implementing, or evaluating a Corporate Compliance Program. HHS-OIG also reinforced the Federal Sentencing Guidelines’ seven elements of an effective compliance program. The guidance is intended to assist with the development and implementation of internal controls and procedures that promote adherence to applicable law, regulations, and rules.

**Industry Codes:** Although medical advancements and treatment options courtesy of the pharmaceutical and medical device industries have benefited countless patients by improving health and outcomes, allowing people to live longer, and advancing the practice of medicine, the industries have been criticized in the court of public opinion as a result of certain questionable practices. To address these reputational concerns, to enhance quality, and to standardize practices, industry codes were developed to provide direction on business conduct. Advanz Pharma abides by these codes and all Advanz Pharma employees shall ensure that their conduct (e.g., interactions with HCPs) is appropriate and of the highest ethical standards. Examples of industry codes that Advanz Pharma follows include:

- Code of Ethical Practices (Innovative Medicines Canada)
- AdvaMed Code of Ethics (US)
- ABPI Code of Practice (UK)
- IFPMA Code of Practice (Global)
- Farmaindustria Code of Practice (Spain)
- Apifarma Ethical Promotion Code (Portugal)
- AKG Code of Conduct (Germany)
- Pharmig Code of Conduct (Austria)
- VIPS Code (Switzerland)
- LIF Ethical Rules for the Pharmaceutical Industry (Sweden)
- ENLI Promotion and Interaction Code (Denmark)

**Australia – Sunshine Reporting via Medicines Australia Code:** In Australia, pharmaceutical companies must disclose certain transfers of value to healthcare

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professionals as required by the Medicines Australia Code. These disclosures are posted publicly to ensure transparency.

### 4.3. Anti-trust and Fair Competition

In a competitive marketplace, Advanz Pharma understands the importance of complying with all applicable anti-trust and fair competition laws. Anti-trust and fair competition laws are meant to prevent restraints on trade or the abuse of a dominant market position, and a competitive marketplace ensures that the greatest benefit can be realized by both consumers of healthcare products and services (i.e., patients and HCPs) and suppliers of those products/services. Each employee is expected to understand and comply with anti-trust and fair competition laws and not to enter into business contracts or engage in activities that violate, or give the appearance of violating these laws. Specifically, when dealing with competitors:

- Advanz Pharma will not enter into agreements or understandings which propose, or give the appearance of, limiting competition; and
- Advanz Pharma will not enter into agreements or understandings which propose, or give the appearance of, sharing price, price-related terms, sales terms, or other conditions.

Violations of these laws by any Advanz Pharma employee carry the risk of severe penalties for both the Company and the individual. Anti-trust and fair competition laws are complex; therefore, employees must contact the Legal Department for approval of any business practice conducted on behalf of the Company that may involve an interpretation of these laws.


### 4.4. Standards for Product Development, Marketing, and Promotion

Advanz Pharma complies with all applicable laws and regulations governing the development, manufacturing, labeling, marketing, sale, and promotion of its pharmaceutical and medical device products. These activities are subject to oversight by regulatory authorities such as the FDA (US), EMA (EU), MHRA (UK), TGA (Australia), and Health Canada, among others. To support compliance, Advanz Pharma maintains specific internal policies that guide each of these areas including Q-PO-1002 Global Healthcare Compliance Policy and Q-PO-1004 Global Healthcare Engagement Policy.

### 4.5. Privacy

Advanz Pharma safeguards and takes steps to protect the privacy of our employees, customers and others. This includes complying with applicable laws when we process personal data. Personal data is disclosed to third parties only when legitimate grounds to do so have been established and appropriate measures have been taken to protect the information to be transferred.

On occasion, Advanz Pharma may receive personal information for legitimate business purposes, including, but not limited to, information concerning colleagues, job applicants, research study subjects, research investigators, patients, consultants, HCPs, vendors, and suppliers. This personal information may or may not be considered Protected Health Information (“PHI”). Advanz Pharma is committed to compliance with applicable legal and regulatory requirements protecting the privacy of persons, including but not limited to PHI, and to safeguarding this information in a

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manner consistent with applicable laws.

PHI refers to individually identifiable health information transmitted or maintained by a covered entity (healthcare provider, healthcare clearinghouse, or health plan) or its business associates in any form or medium. This includes medical, mental, dental, vision, and benefit records, or other data that contains any type of health-related information that that relates to the individual’s past, present or future physical or mental health or condition and identifies the covered person by either name, social security number, birth date, address, age, other identifiers etc., that is either stored or transmitted by Advanz Pharma in any form, such as electrical, paper, or oral transmission.

Advanz Pharma respects individual privacy and adheres to applicable data privacy/data protection laws and regulations. All Advanz Pharma employees are expected to protect individually identifiable information as it pertains to employees, applicants, clinical trial and research study patients, and customers.

**4.6. Product Complaints and Adverse Event Reporting**


Advanz Pharma strives to ensure that all Advanz Pharma products are safe and effective. In furtherance of this, it is crucial that the Company closely monitors the safety of its products and immediately evaluates any concerns that arise. Any employee who learns of an adverse event, product quality complaint, or obtains safety information must report it within one business day to [medicalinformation@advanzpharma.com](mailto:medicalinformation@advanzpharma.com) (global). *For more information, see Contact details for Medical Information Q-FO-1128.*

**4.7. Corporate Opportunities**

Employees are prohibited from (a) taking corporate opportunities that are discovered through the use of Advanz Pharma’s property, information, or position and using them personally; (b) using Advanz Pharma’s property, information, or position for personal gain; and (c) competing with Advanz Pharma. Employees owe a duty to Advanz Pharma to advance its legitimate interests when the opportunity to do so arises.

**4.8. Fair Dealing**

Each employee should endeavor to deal fairly with Advanz Pharma’s shareholders, customers, suppliers, competitors, and employees. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

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## 5. BUSINESS STANDARDS

### 5.1. Overview

At Advanz Pharma, employees work together to adhere to applicable laws and regulations. This includes a personal responsibility to protect corporate assets and integrity. To achieve such high standards, Advanz Pharma employees must adhere to all applicable laws and regulations. In doing so, they must steer clear of any conflicts of interest that may affect Advanz Pharma's reputation. Employees must uphold Advanz Pharma's values while conducting business within the letter and spirit of the law.

### 5.2. Conflicts of Interest

Advanz Pharma employees have a responsibility to the Company, their co-workers, and themselves to avoid conflicts of interest. A conflict of interest may arise when personal interests compromise, or have the appearance of compromising, judgment. Advanz Pharma employees have a duty to avoid conflicts of interest whenever possible, always keeping the Company's best interest in mind. Employee decisions that conflict with their professional or ethical obligations to Advanz Pharma, or are solely for personal gain, should not be made. Three general rules in avoiding conflicts of interest are:


- a) Business activities with suppliers, customers, and other individuals or entities should be conducted in a fair and objective manner;
- b) Do not personally profit, in kind or in cash, from Advanz Pharma business transactions; and
- c) Avoid any conflict of interest with family members when conducting business activities for Advanz Pharma (e.g., do not recommend or use family members' businesses, services, or products in your capacity as an Advanz Pharma employee).

In the event that an actual conflict of interest arises between the personal, professional, or financial duties of an Advanz Pharma employee, the employee involved in this conflict of interest should address, disclose, and handle the matter in the utmost ethical manner and in accordance with this Code, including disclosing such conflict of interest to their supervisor or the Compliance Officer.

Employees are required to complete an annual conflict declaration.

### 5.3. Hedging Prohibition

Directors, officers, and employees of Advanz Pharma are not permitted to purchase financial instruments, including, for greater certainty, prepaid variable forward contracts, equity swaps, collars, or units of exchange funds, that are designed to hedge or offset a decrease in market value of equity securities granted as compensation or held, directly or indirectly, by any director, officer, or employee other than solely in connection with the exercise of options or vesting of restricted share units held by a director, officer, or employee to pay the required amount of withholding taxes and/or the exercise price to acquire common shares of Advanz Pharma under stock options granted to such directors, officers, and employees.

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#### 5.4. Insider Trading

Insider trading involves the purchase or sale of securities of a reporting issuer with knowledge of a material fact or material change with respect to the reporting issuer that has not been generally disclosed. The prohibition against insider trading also applies to trading in the securities of any publicly traded company about which an Advanz Pharma employee, director, or agent may receive inside information during the course of his or her relationship with Advanz Pharma. Employees, officers, stockholders, and directors (and their families) are obligated to abide by applicable laws and regulations prohibiting trading in the securities markets based on inside information or communicating inside information about Advanz Pharma or its business partners, competitors, customers, or suppliers. Any Advanz Pharma employee, officer, or director who has a question regarding stock trading or the sharing of Advanz Pharma information with third parties should review the Disclosure, Securities Trading and Confidentiality Policy and/or contact Advanz Pharma's Compliance Officer.


In addition, only designated persons within Advanz Pharma are authorized to discuss Advanz Pharma business with brokers, analysts, stockholders, and the media. All Advanz Pharma employees, officers, and directors must exercise reasonable care not to disclose inside information to outsiders, either intentionally or inadvertently, under any circumstances. If questioned by the media, an analyst, or an investor, all Advanz Pharma employees are to direct inquiries to Investor Relations or the Legal Department. Any employee who becomes aware of information that may be considered material should advise Investor Relations or the Legal Department so that a proper determination can be made about whether the information should be publicly disclosed.

#### 5.5. Competitive Intelligence

Advanz Pharma believes in free and open competition in the marketplace. Keeping up with the competition means having the ability to produce proper business plans, which sometimes include an assessment of competitors' products, services, or business. However, Advanz Pharma respects the privacy and confidentiality of its competitors' information and only wishes to gather such information pertaining to competitive advantages in a reasonable and ethical manner.

Any information gathered regarding a competitor should be sourced from the public domain. Publicly available sources for such information include:

- Regularly published materials such as newspapers, business journals, etc.;
- Filings such as those made with stock exchanges or pursuant to corporate statutes (e.g., with the Registrar of Companies in the United Kingdom) or pursuant to securities laws [e.g., on the System for Electronic Document Analysis and Retrieval ("**SEDAR**"), [www.sedar.com](http://www.sedar.com), in Canada and on the Electronic Data Gathering, Analysis, and Retrieval System ("**EDGAR**"), [www.sec.gov](http://www.sec.gov), in the United States];
- Financial disclosure such as a company's annual reports and financial statements (which may be found on SEDAR, EDGAR, or the Company's website);
- Third party analyses, such as market surveys or reports prepared by analysts who cover the Company; and

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- Information disclosed by the Company at trade shows or conferences.

Obtaining a competitor’s confidential, non-public information through unlawful practices is not permitted. The improper gathering of competitive information could subject Advanz Pharma and the employee to criminal and civil liability. Any Advanz Pharma employee who has acquired a competitor’s private and confidential information unlawfully will be required to immediately destroy the confidential information and is subject to disciplinary action and if necessary, legal action.


**5.6. Confidential Information**

The release of confidential information about Advanz Pharma or its business or products may harm the Company. It is imperative that any confidential scientific and business information regarding Advanz Pharma, as well as the Company’s trade secrets, be protected to ensure the Company’s success. It is the duty of Advanz Pharma employees to safeguard this confidential information. Confidential information includes, but is not limited to:

- Unpublished financial information including, but not limited to, financial models, sales and revenue information, and pre-commercial product launch information;
- Inventions, trade secrets, know-how;
- Operational and/or marketing plans, systems, techniques, information, and budgets;
- Personal information including, but not limited to, compensation, wage, and benefits information;
- Information pertaining to specific customer, customer information, and customer requirements;
- Personal information or PHI (e.g., individually identifiable health information such as name, address, birth date, social security number, etc.);
- Information pertaining to Advanz Pharma’s relationship with existing or potential strategic partners, suppliers, distributors, consultants, or any other information that is not publicly available; and
- Information that might affect Advanz Pharma’s competitive position.

Employees must maintain the privacy of confidential information pertaining to Advanz Pharma’s business at all times. Confidential information known by an employee must remain confidential both during and after employment with the Company (whether such termination is voluntary or involuntary). Any Advanz Pharma employee who improperly uses or discloses confidential information will be subject to disciplinary action, up to and including termination of employment without notice and legal action, even if they do not personally benefit from the disclosure. When leaving the employ of Advanz Pharma, an employee must return all confidential information in any form and all copies which are, or may have been, in his or her possession.

If an employee has any doubt as to the confidentiality of specific information, he or she should discuss it with the Legal Department.

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### 5.7. Company Assets

Advanz Pharma offers employees access to a variety of the Company's resources such as Company property, information, resources, systems, and many other supplies. These resources are intended to be used by employees for Company business and the employee assumes the responsibility to protect against theft, loss, misappropriation, and misuse. These resources should be used only for Company business and not for any personal use, though incidental personal use may be permitted at times.

It is important to recognize that any and all data and/or other information linked to these assets, such as email, documents and any other files, are the property of Advanz Pharma. The Company reserves the right to retain and inspect this data and/or information, including any electronic communications transmitted over any Advanz Pharma network, with or without an employee's or third party's knowledge, consent or approval, in accordance with applicable law, except in each case as may be limited by applicable foreign laws.

All Advanz Pharma employees shall provide reasonable and appropriate care when dealing with Advanz Pharma's assets, resources, and property. Any misuse of Advanz Pharma's assets, resources and/or property that an employee becomes aware of should be reported to his or her supervisor, and if appropriate, the Legal Department.


### 5.8. Training

Keeping up with any additions, changes, removals, or implementations of laws, regulations, guidance, and standards is imperative to ensure that Advanz Pharma is performing its operations compliantly. In order to inform our employees of such changes, we will conduct trainings, which may be live, via video or teleconference, via read and certify, or utilizing Advanz Pharma approved training platforms. Attendance at all training sessions is mandatory as is completion of all training requirements. If an employee is unable to attend a training session, they must provide their supervisor notice prior to the date of the training session and make other arrangements to receive the training. An attendance sheet must be signed by each employee in attendance containing the training topic, date, and instructor.

### 5.9. Record Retention and Documentation

On a daily basis, new information is being discussed, shared and generated by Advanz Pharma employees, in paper form, electronic form through emails, voicemails, CDs, DVDs, audio clips, and more. Only information and records that are complete and accurate provide benefit to the Company. It is the responsibility of each Advanz Pharma employee to properly capture accurate and complete records in line with any regulatory, legal, and financial requirements.

It is also our duty to make sure that the information is stored in a secure manner and complete records are identified, indexed for retrieval, securely stored, and disposed of in the appropriate manner. Advanz Pharma must retain records for immediate use, as well as possible long-term use for litigation purposes, historical reference, contractual obligations, regulatory or legal requirements, or for other purposes as determined by Advanz Pharma. When a record supersedes the necessary retention period or is simply no longer needed, it may be discarded. Should a current or potential lawsuit, audit, or internal investigation be initiated, discarding of records should be suspended in accordance with the applicable legal hold. If an Advanz Pharma employee is

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unsure as to whether a document should or should not be disposed of, he or she should contact the Legal Department.

### 5.10. Artificial intelligence

Advanz Pharma uses artificial intelligence responsibly and ethically, with awareness of the inherent risks in using artificial intelligence. We only use vetted and approved artificial intelligence for the completion of work related tasks.

For more information, see our *Artificial Intelligence Usage Guidelines (available on Connect)*.

## 6. PUBLIC STANDARDS

### 6.1. Overview

Advanz Pharma is committed to being a good corporate citizen in the communities in which it does business. Advanz Pharma employees must provide an accurate and consistent message to the public when speaking of, or representing, Advanz Pharma.

### 6.2. Charitable Contributions

Advanz Pharma employees are encouraged to give back to the community through charitable contributions. While such contributions to the community can make a difference, Advanz Pharma must ensure that these contributions are provided in accordance with Company policies and applicable laws and regulations. Questions with regards to charitable contributions may be directed to the Compliance Officer.


### 6.3. Political Contributions and Activities

Advanz Pharma encourages its employees to engage in political activities, such as the right to vote. However, it is imperative that all employees understand that these engagements should not be conducted on behalf of the Company or in any way that is likely to give the impression that the Company is taking a stance to support or endorse any candidate, political party, or cause. Such activities must also be done on personal time and without the involvement of any Advanz Pharma resources. Questions with regards to political contributions and activities may be directed to the Compliance Officer.

### 6.4. Media and Public Inquiries

It is extremely important that any message to the public be accurate, consistent, and authorized by the appropriate person at Advanz Pharma. All employees must be aware of, and adhere to, Advanz Pharma's guidelines on communicating with the public through the media, press releases, promotional materials, or other means. Any requests for information from Advanz Pharma by an outside party should be immediately referred to Corporate Communications at [globalcorporatecomms@advanzpharma.com](mailto:globalcorporatecomms@advanzpharma.com).

### 6.5. Social Media

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When using social media, employees must avoid creating the impression that they are speaking on behalf of the Company unless they are explicitly authorized to do so. Employees are expected to take reasonable steps to ensure they are not perceived as representing Advanz Pharma, and that any content they share is appropriate and aligned with professional standards. All use of social media must also comply with Q-PO-0002 Social Media Global Policy, as well as all applicable laws and regulations governing communications, advertising, data privacy, and industry-specific requirements.

## 7. ENVIRONMENTAL SUSTAINABILITY

We conduct our business in compliance with applicable environmental laws and regulations and we integrate sustainability considerations into our business strategy and value creation plans.

We recognize that climate change mitigation and climate change adaptation are fundamental for any company’s long-term business success. We continuously strive to ensure that our operations are conducted with the least possible negative impact on the environment, climate, water, and ecosystems and strive to adapt as needed.

In our day-to-day operations, we create plans to meet our climate and environmental targets. This includes finding ways to take preventative action to lower our greenhouse gas emissions, mitigate the impact of our products, components (such as APIs), and services to the environment, and to choose sustainable materials when sourcing. The environmental impact of travel is always considered and we organise business travel with sustainability considerations. Ideas from employees that reduce the climate and environmental impact of our activities are supported and encouraged.


## 8. ADVANZ PHARMA COMPLIANCE PROGRAM

### 8.1. Compliance Program and Leadership

Advanz Pharma has adopted policies, procedures, training programs, and mechanisms to promote an atmosphere of open, honest, and ethical communication throughout Advanz Pharma. Constantly monitoring the compliance of Advanz Pharma through audits and other reviews allows Advanz Pharma to investigate any allegations of non-compliance with Advanz Pharma policies and/or applicable laws and regulations and the opportunity to correct any systems or discipline employees associated with such non-compliance. These audits and reviews allow Advanz Pharma to uphold the ethical principles described above. These and any similar processes or systems adopted in the future constitute our Compliance Program.

Advanz Pharma has designated a Global Compliance Officer. In this role, the Global Compliance Officer is primarily responsible for oversight of the Compliance Program, but each employee plays an important role in building and supporting the Compliance Program for Advanz Pharma. Employees should refer to Advanz Pharma’s Ethics and Compliance Charter for further information regarding the Company’s Compliance Program and the role of the Global Compliance Officer, and Compliance Committee.

### 8.2. Reporting of Any Known or Suspected Violations

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As one Company working together, Advanz Pharma is committed to ensuring compliance with Company policies and applicable laws and regulations to preserve the Company's reputation, ensure the safety of its customers, and to continue to be successful. This is all possible because of the Company's dedication to compliance with all applicable laws and regulations and Company policies.

If an Advanz Pharma employee knows of or suspects a violation of a Company policy, procedure, law, or regulation or of unethical conduct, he or she has a responsibility to report this. Examples of issues that require reporting include financial improprieties, accounting or audit matters, ethical violations, illegal practices, or violations of Advanz Pharma's Code or policies. The failure to report such a violation will itself be viewed as a violation of this Code. Appropriate channels to report a concern include your supervisor or another supervisor, the Human Resources department, the Compliance Officer, the Legal Department, or through Advanz Pharma's reporting mechanisms (e.g., the Compliance Hotline). Advanz Pharma expects employees to report concerns with as much information, facts, and details as possible related to the known or suspected issue so that the Company can evaluate the reports and identify and correct any problems promptly.


### 8.3. Compliance Hotline

Advanz Pharma has established a compliance reporting mechanism for anyone who wants to report a good faith concern related to unethical or illegal conduct or violations of this Code. Good faith means a sincere and honest belief that is not motivated by malice or the desire to defraud others for personal gain. The hotline may be used to anonymously report violations or suspected violations of the law of this Code. Local compliance hotlines by country are available at any time of the day or night and contact information is available via Connect or at <https://secure.ethicspoint.com/domain/media/en/gui/39867/index.html>.

### 8.4. Investigation and Enforcement

Reports of suspected misconduct and compliance violations made in good faith will be subject to investigation promptly and thoroughly by the appropriate persons. This information will be treated as confidential and remain anonymous unless disclosure to a third party is deemed necessary for the investigation. The Global Compliance Officer is responsible for determining the resources that will conduct the investigation, depending on the nature of the reported concern. Cooperation is imperative during internal investigations by each Advanz Pharma employee involved in such investigations.

If you suspect a person has violated the Code of Conduct, or engaged in other serious misconduct, and you would prefer to file an anonymous report, you may report a concern through the whistleblowing system. *See the Whistleblower Policy (available on Connect).*

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**8.5. Retaliation is Prohibited**

Advanz Pharma strictly prohibits intimidation or retaliation of any kind against an employee who seeks advice, raises a concern, reports known or suspected violations or unethical conduct, or provides information in an investigation, even if the good faith report is not substantiated. If an employee believes they have been subject to retaliation, or know of someone who has, they should notify their supervisor or the Global Compliance Officer.

**8.6. Disciplinary Actions**

This Code is provided to give Advanz Pharma employees the tools to understand and adhere to the laws, regulations, and internal policies that guide our Company and allow us to achieve the highest standards of conduct. Therefore, employees are subject to disciplinary action for authorizing or participating in an activity that results in a violation of the law, Company policies, or any other applicable standard or procedure.

Each situation will be evaluated and handled individually by Advanz Pharma. Disciplinary action will depend on the circumstances of each specific incident. If disciplinary action is warranted, subject to local law, it may range anywhere from a warning to termination of employment. In certain circumstances, subject to local laws, an employee may be subject to criminal fines, imprisonment, and/or an official prohibition on working in the pharmaceutical industry.


**8.7. Waivers and Amendments**

This Code may be amended at any time without prior notice. If necessary, amendments to the Code will be provided by the Compliance Officer. Amendments to this Code will be promptly disclosed to Advanz Pharma employees.


**8.8. Expectations of Advanz Pharma Employees**

Employees are expected to be a part of Advanz Pharma’s achievements. Compliance with applicable laws, regulations, Company policies, and industry best practices is essential to that success. All Advanz Pharma employees are required to certify that they have read and understood the Company’s Code of Conduct, demonstrating their commitment to the highest standards of ethical and professional behavior.


**9. APPROVALS**

Approved by	Title	Signature	Date
Eve-Anadel Coronado	General Counsel	DocuSigned by:  70D003C3DC5B4B0...	November 28, 2025   10:53 GMT

**10. DOCUMENT HISTORY**

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Version #	Effective Date	Author	Revision Summary
8	Nov 28, 2025	Robert Ford, Amman Ayub	<ul style="list-style-type: none"> <li>Addition of Schedule 2- Failure to Prevent Fraud offence</li> </ul>
7	May 19, 2025	Robert Ford, Amman Ayub, Vinod Koshy	<ul style="list-style-type: none"> <li>Addition of new Section 2 (Human Rights and Section 7 Environmental Sustainability, and other update amendments and clarifications</li> </ul>
6	August 11 <sup>th</sup> , 2020	Emilie Pages	<ul style="list-style-type: none"> <li>Consolidated version following Correvio acquisition</li> </ul>
5	November 29, 2018	Julian Shellard	<ul style="list-style-type: none"> <li>Rebranding Concordia International to Advanz Pharma</li> </ul>
4	May 08, 2018	Andrew Teehan	<ul style="list-style-type: none"> <li>Revisions to Section 4.5 other minor amendments and certain clarifications.</li> </ul>
3	March 07, 2017	Stephanie Wisdo	<ul style="list-style-type: none"> <li>New document control and numbering system implemented. Code of Conduct is now GPOL-GEN-001</li> <li>Changed from Advanz Pharma Healthcare Corp. to The Advanz Pharma Group</li> <li>Letter from the new CEO</li> <li>Changes made to various sections to harmonize with new global policies</li> </ul>
2	April 19, 2016	Andrew Teehan	Added new section "Prohibition Against Hedging"
1	July 7, 2014	Francesco Tallarico	New Policy Number 1

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## Schedule 1 – Prevention of Tax Evasion Facilitation

### 1. Introduction

Advanz Pharma is committed to conducting business ethically and transparently. We maintain a zero-tolerance approach to tax evasion and its facilitation, wherever we operate.

### 2. The Criminal Finances Act 2017 and Corporate Criminal Offence (CCO) Regime

The Criminal Finances Act 2017 introduced the corporate criminal offence for failing to prevent the facilitation of tax evasion, whether involving UK or foreign taxes. Advanz Pharma may be guilty of an offence if:

- a taxpayer commits tax evasion;
- an associated person criminally facilitates the evasion; and
- Advanz Pharma fails to have reasonable prevention procedures in place.

The definition of “associated person” includes employees, officers, consultants, third-party representatives, and business partners, among others.

### 3. What Constitutes Tax Evasion and Its Facilitation?


“Tax Evasion”: A deliberate act to avoid paying tax that is due under the law.

“Facilitation of Tax Evasion”: Knowingly assisting another person or entity in committing fraudulent tax evasion, including aiding, abetting, or conspiring to evade tax liabilities.

### 4. Preventive Measures and Responsibilities

Advanz Pharma has implemented the following preventative measures:

- Due Diligence: Vetting third parties to identify potential tax evasion risks.
- Contracts and Agreements: Ensuring agreements with third parties include anti-tax evasion provisions.
- Training and Awareness: Mandatory compliance training on tax evasion risks for employees and third-party representatives.
- Internal Monitoring and Auditing: Regular compliance checks to detect and prevent tax evasion.
- Whistleblowing and Reporting: Encouraging employees to report any suspicious activity through Advanz Pharma’s Whistleblowing Policy and process.

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## 5. What Employees and Associated Persons Must Not Do

Employees and associated persons must not:

- Engage in any form of tax evasion or its facilitation.
- Knowingly assist in the fraudulent evasion of tax by any individual or business.
- Ignore signs of tax evasion within business transactions.
- Retaliate against anyone who reports a potential breach of this policy.

## 6. How to Identify Suspicious Activity

The following are indicators of potential tax evasion by a third party:

- False or misleading tax statements.
- Requests for cash payments without invoices or contracts.
- Requests to make payments to an offshore account unrelated to the business transaction.
- Attempts to misclassify employees as self-employed contractors to avoid tax obligations.
- Refusal to provide tax registration details (e.g., VAT number).
- Requests to backdate contracts or issue misleading invoices.

## 7. How to Report Concerns

Employees and associated persons must report any suspicions of tax evasion facilitation to:


- their line manager;
- the Legal and Compliance team; or
- the Whistleblowing Hotline (confidential reporting mechanism).

Reports will be treated confidentially and in line with Advanz Pharma's non-retaliation policy.

## 8. Consequences of Non-Compliance


Breaches of this policy may result in:

- Internal disciplinary action, including termination of employment.
- Legal liability, including fines and imprisonment.
- Corporate liability for Advanz Pharma, with significant financial and reputational consequences.

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## 9. Key Contacts

If you have any questions or concerns, please contact the Legal and Compliance team. Should it be deemed appropriate, they will escalate any concerns to the Ethics and Compliance Committee.

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## Schedule 2 - Prevention of Fraud

### 1. Introduction

Advanz Pharma is committed to conducting business ethically and transparently. We maintain a zero-tolerance approach to fraud, wherever we operate.

### 2. The Economic Crime and Corporate Transparency Act 2023 (ECCTA) and the "Failure to Prevent Fraud" Offence

Section 199 of the **Economic Crime and Corporate Transparency Act 2023 (ECCTA)** introduces a new corporate criminal offence for **failing to prevent fraud (FTPF)**. This offence applies to organisations where fraud is committed by an employee or any "associated person" (including officers, consultants, agents, subsidiaries, third-party representatives, or business partners) who provides services for or on behalf of Advanz Pharma, with the intention of benefiting Advanz Pharma or its clients.

Key points:

- **No requirement for senior management knowledge or involvement:** It does not need to be shown that Advanz Pharma's Directors or Senior Managers ordered or were aware of the fraud.
- **No requirement for actual benefit:** The offence can apply even if Advanz Pharma did not ultimately benefit- the intention alone is sufficient.
- **Corporate liability only:** The offence does not create individual liability for failing to prevent fraud, but Advanz Pharma can be prosecuted corporately for failing to have reasonable prevention procedures in place.

### 3. Aims of the Legislation and Background


Under ECCTA, the FTPF offence sits alongside existing law. For example, the person who committed the fraud may be prosecuted individually for that fraud, while Advanz Pharma may be prosecuted for failing to prevent it. The Act makes it easier to hold Advanz Pharma to account for fraud committed by employees, its agents, or other associated persons working on behalf of Advanz Pharma, which may benefit Advanz Pharma, or, in certain circumstances, its associated persons. The offence is designed to encourage more companies to implement or improve prevention procedures, driving a major shift in corporate culture to help prevent fraud.

### 4. What constitutes "Fraud"?

**"Fraud":** A deliberate act of deception intended to secure an unfair or unlawful gain, or to cause a loss to another party. This includes, but is not limited to, fraud by false representation, fraud by failing to disclose information, and fraud by abuse of position. Crucially, there would have to be dishonest intent for an offence to be committed.

Specified offences under the act include:

- fraud by false representation (section 2, Fraud Act 2006)
- fraud by failing to disclose information (section 3, Fraud Act 2006)

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- fraud by abuse of position (section 4, Fraud Act 2006)
- obtaining services dishonestly (section 11, Fraud Act 2006)
- participation in a fraudulent business (section 9, Fraud Act 2006)
- false statements by company directors (Section 19, Theft Act 1968)
- false accounting (section 17, Theft Act 1968)
- fraudulent trading (section 993, Companies Act 2006)
- cheating the public revenue (common law)

## 5. Preventive Measures and Responsibilities

Organisations can avoid liability under ECCTA, if they can prove they had reasonable fraud prevention procedures in place at the time of the offence.


What is considered reasonable will vary depending on the size, structure and risk profile of the organisation, and the size and complexity of its operations. Advanz Pharma has implemented the following preventative measures:

- **Top Level Commitment:** By adopting this Schedule 2, Advanz Pharma's Board and Executive Leadership Team actively endorse and oversee fraud prevention measures by visibly communicating a zero-tolerance stance on fraud, allocating resources and budget for compliance activities, appointing a team to review fraud risk assessments and prevention controls, and embedding fraud prevention objectives into governance and leadership reporting.
- **Risk Assessment:** Regular assessment of our fraud risk exposure across business activities and geographies.
- **Due Diligence:** Vetting of third parties, clients, and business partners to identify potential fraud risks.
- **Contracts and Agreements:** Ensuring agreements with third parties include anti-fraud and compliance provisions.
- **Training and Awareness:** Mandatory compliance training on fraud risks and prevention for employees and third-party representatives.
- **Internal Controls and Monitoring:** Implementing financial and operational controls, with regular audits to detect and prevent fraudulent activity.
- **Whistleblowing and Reporting:** Encouraging employees to report any suspicious activity through Advanz Pharma's Whistleblowing Policy and process.

## 6. What Employees and Associated Persons Must Not Do

Employees and associated persons must not:

- Engage in any form of fraudulent activity.
- Knowingly make false or misleading statements, or fail to disclose information, for personal or corporate gain.

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- Falsify any records, documents, or data.
- Ignore signs of fraud within business transactions.
- Retaliate against anyone who reports a potential breach of this policy.

**7. How to Identify Suspicious Activity**

The following are indicators of potential fraudulent activity:

- Requests to process invoices or payments that lack proper supporting documentation or approval.
- Requests to make payments to a country or bank account that has no clear connection to the business transaction.
- Pressure to bypass standard approval processes or internal controls for a transaction.
- Offers of, or requests for, unusual or excessive commissions, fees, or gifts.
- An associated person living beyond their means or showing unusual interest in circumventing controls.
- Unexplained discrepancies in records, invoices, or financial statements.

**8. How to Report Concerns**

All employees and others associated with Advanz Pharma are required to promptly report any concerns that they may have regarding potential breaches of this Code of Conduct and Schedule 2, including incidents relating to external agencies and third parties. This includes any instances where you may be the victim of attempted fraud and fraud against Advanz Pharma as well as fraud intended to benefit Advanz Pharma or its associated persons. Employees and associated persons must report any suspicions of fraud to:

- their line manager;
- the Legal and Compliance team; or
- the Whistleblowing Hotline (confidential reporting mechanism).

Reports will be treated confidentially and in line with Advanz Pharma's non-retaliation policy.


**9. Consequences of Non-Compliance**

In line with our Non-Compliance and Conducting Internal Investigations Policy, any breach of this policy, allegation, or suspicion of fraud will be promptly investigated by the Global Compliance Officer, in conjunction with the Legal Department, who will ensure all details of the suspected incident are recorded and verified with the individual who raised the concern.

Depending on the nature and severity of the allegation, the Legal Department will determine whether the matter should be reported to law enforcement or other relevant authorities.

Confirmed breaches of this policy may result in:

- Internal disciplinary action, including termination of employment.

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- Personal criminal liability for the individual committing the fraud, including fines and imprisonment.
- Corporate criminal liability for Advanz Pharma, with the potential for unlimited fines and significant reputational damage.

**10. Key Contacts**

If you have any questions or concerns, please contact the Legal and Compliance team. Should it be deemed appropriate, they will escalate any concerns to the Ethics and Compliance Committee.