

TOLERANCE, EXPERTISE, INNOVATION, QUALITY

Code of Conduct



BIOSPRING
THE NUCLEIC ACID COMPANY

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General information on BioSpring

Who We Are

BioSpring is a medium-sized, owner-managed biotech company based in Frankfurt am Main. Since 1997, customers from around the world have relied on our specialized production and analytical services. We are one of the world's leading manufacturers of synthetic oligonucleotides for therapy, diagnostics, as well as research and development. With passion and commitment, we collaborate with our customers to create success stories in treating genetically determined diseases. Since 2007, we have been certified for therapeutic oligonucleotide production under GMP. The therapeutic oligonucleotides we produce for the pharmaceutical industry are used in clinical trials to successfully treat numerous diseases.

What We Do

We work with the building blocks of life. Oligonucleotides are short, synthetically produced nucleotide sequences ranging from 2 to 200 units in length. Nucleotides (A, C, G, T) carry the genetic information of all living beings on our planet. Certain segments of DNA function as cellular "blueprints" for the expression of all traits of a living being and are called genes. Changes in the sequence of nucleotides within a gene can cause severe diseases. Synthetic oligonucleotides are indispensable in many areas of biotechnology and pharmaceuticals, are increasingly used in developing novel drugs for numerous diseases and are one of the most promising classes of molecules for new therapeutic approaches.

What We Value

As a company in the biotechnology industry that is internationally active and rapidly growing, we place high importance on quality, knowledge, and innovation. These are the main pillars of our success. Each of us makes a crucial contribution and is an essential part of BioSpring. Our work life is characterized by mutual respect and appreciation, creating a harmonious work atmosphere with open communication. We aim to create a professional, dynamic, and familial environment for our employees where they can fully develop and contribute.

How We Operate

With a strong scientific team of almost 650 employees, we at BioSpring are continuously working on developing new processes and methods. State-of-the-art facilities enable us to realize and provide the best technical solutions. This allows us to synthesize oligonucleotides in scales from milligrams to multi-hundred kilograms. The therapeutic oligonucleotides we produce for the pharmaceutical market are active pharmaceutical ingredients, used in diagnostics or research, and must meet high-quality standards. For this reason, we manufacture active pharmaceutical ingredients according to GMP guidelines (Good Manufacturing Practice) and are regularly audited by customers and inspected by authorities. Our high-quality standards ensure a flawless product, which guarantees patient safety and high customer satisfaction. Diagnostic oligonucleotides are produced within the ISO13485 quality system.

What Drives Us

Synthetic oligonucleotides have enormous potential to provide therapeutic approaches for a variety of previously untreatable, severe diseases. Numerous clinical studies are investigating oligonucleotide-based active substances. Each one of us can make an important contribution in the fight against genetic disorders in one of the fastest growing and most promising areas of biotechnology with our knowledge and skills.

Contents of the Code of Conduct

Quality awareness, expertise, and innovation are the cornerstones of our success. These qualities, combined with tolerance, are also important in our daily work life. Thus, these values determine both our business actions and collegial interactions, ensuring ethical standards are maintained. This creates a work environment characterized by entrepreneurial thinking, integrity, respect, and fair behavior. Based on our values, philosophy, and legal requirements, the Code of Conduct establishes fundamental rules, norms, and behaviors for our daily work. Employees are encouraged to act responsibly and are given the necessary guidance.

Equal Treatment

We are committed to tolerance and equality at all levels of the company. This applies to personnel decisions such as recruitment, promotions, personal development, compensation, and all interpersonal relationships. There should be no disadvantage, exclusion, favoritism, or inappropriate behavior, based on age, race, skin color, gender, sexual orientation, origin, religion, or disability. Additionally, sexual harassment or similar conduct in the workplace is strictly prohibited. We promote a diverse and inclusive work environment where all employees are treated with respect and dignity. All employees must respect the rights of others and the specific and cultural differences in business interactions. BioSpring condemns illegal discrimination or harassment of any kind and particularly respects the principles of the International Charter of Human Rights.

Appreciation and Interaction with Each Other

As a socially responsible employer, BioSpring values its employees highly. Together, we are BioSpring. Each one of us makes an important contribution to the company's success. Therefore, every employee is valued for their knowledge and skills. Our personnel policy aims to provide every employee with the opportunity for professional and personal development. Open exchange of opinions, expression of criticism, and contribution of ideas are encouraged. We foster a culture of fairness and mutual appreciation. Respectful and tolerant interaction creates a harmonious working climate. We expect our employees to always be helpful and communicate openly. Managers are encouraged to promote these values within their teams and lead by example. Regular employee meetings should provide space for open discussions to enhance satisfaction, cooperation, and effectiveness.

Communication

A competent and quality-conscious work approach can only be ensured through smooth information exchange. All information must be correctly and fully passed on to the relevant areas. Relevant knowledge must not be withheld, falsified, or selectively shared unlawfully. We promote an open error culture, as this is the only way to ensure the quality of our products and work. We want to learn from mistakes and take measures to avoid repeating them in the

future. We manufacture products that can potentially impact human health. Therefore, an unreported error could threaten lives. Safety and hazard prevention always take top priority.

Quality Awareness

Every drug/active substance and every product used in diagnostics must meet high-quality standards. Any deficiency can have a direct impact on patient health. As a manufacturer, we are obligated to have a quality assurance system that ensures consistent production, including the testing of each batch. Therefore, manufacturing according to GMP guidelines (Good Manufacturing Practice) is mandatory. We are regularly audited by customers or authorities for this purpose. Our high-quality standards ensure a flawless product to guarantee patient safety and high customer satisfaction. Our compliance team continuously works on developing an effective quality system. At all work steps, the requirements of the GMP guidelines, safety regulations, laws, and internal policies must always be followed. Only after proper training and careful study of the SOPs can one work independently. Regular training solidifies and further develops both professional and personal skills. Quality concerns everyone. Each employee must ensure the correct implementation of quality measures and report any deficiencies.

Safety, Health, and Environment (SHE)

A safe work environment can only be ensured through the responsible participation of everyone. Safety regulations, such as wearing prescribed protective equipment and providing first aid in emergencies, must be strictly followed. BioSpring qualifies sufficient first responders, fire protection helpers, evacuation helpers, and safety officers. Employees also receive training and safety information regarding hazardous materials to protect themselves from potential dangers. Hazardous materials can include, but are not limited to, raw materials, intermediates, products, solvents, cleaning agents, and waste. All employees are co-responsible for their safety and the safety in their area. BioSpring and each employee see themselves obliged to act economically, sustainably, and environmentally consciously. This includes careful use of working materials, chemicals, and products, as well as proper disposal of waste. We have procedures and systems in place to ensure the safe handling, transport, storage, recycling, reuse, or disposal of waste. Any generation and disposal of waste, emissions into the air, and discharges into water that may adversely affect human health or the environment must be appropriately minimized, managed, controlled, and/or treated before release. All employees are co-responsible for ensuring and implementing the system and are trained accordingly. Everyone can and should participate in the sustainable optimization of resources used, such as energy, water, and materials. Employees are responsible for the proper and careful handling of company property and are obliged to protect it against loss, damage, misuse, theft, embezzlement, or destruction. Everyone must also contribute to maintaining a tidy and clean workplace and surroundings.

Conflict of Interest

Employees are expected to act in BioSpring's best interests and uphold the company's reputation. This means employees should avoid conflicts of interest and ensure their personal interests do not influence or contradict their business activities. For example, employees should not make investments, take on interests, or join organizations that could raise doubts about their fairness, integrity, or objectivity among third parties. Any existing or potential conflicts of interest should be reported to the supervisor to seek a solution together to avoid

or at least minimize the conflict. Integrity and honesty promote fair competition, also in relations with our customers and suppliers.

Fair Competition

Fair competition is an important part of our market economy and must be protected by complying with applicable laws on antitrust, competition, and competition restrictions. Unfair advantages over customers, suppliers, or competitors are to be avoided. Small gifts, business meals, and events for informational, representational, or entertainment purposes can be used as legitimate means to build and support our business relationships. However, they must never be used to gain unfair business advantages and should not occur in a scope or manner that questions the professional independence and judgment of the participants. We do not bribe employees of other companies, authorities, or private individuals, nor do we accept bribes. No intermediaries such as representatives, consultants, dealers, or other business partners should be used to commit acts of bribery. Gifts and hospitality should never be offered, promised, or provided, to induce the recipient to act in favor of either the business partner or BioSpring, to reward such behavior, or to refrain from something that disadvantages the business partner or BioSpring. Gifts and hospitality must be modest, appropriate, and rare for each recipient. Grants and donations are only given if the business partner or BioSpring receives no specific consideration in return and are not recognized as such. Grants and donations are not considered rewards for specific considerations. Sponsorship should not be used (or perceived as used) to gain improper economic advantage. Sponsorship should never reward (or be perceived as rewarding) improper commercial advantages.

Customer Orientation

We are a contract manufacturer and only produce on behalf of our customers. Meeting customer needs and requirements is crucial for project planning. This includes adhering to specified timelines. Only by ensuring the timely delivery of our high-quality product/service can we achieve high customer satisfaction and long-term business relationships. Our product is mostly used in clinical trials, so a delayed provision of the active ingredient can have significant and costly consequences for our customers. For approved medications, there is a risk that patients cannot be supplied if we do not provide our services on time.

Internet, Email, and Attachments Usage

Employees are prohibited from using company computers for personal purposes, participating in private email traffic (reading, creating, sending private emails, or using the company email address for private purposes), or downloading or uploading software on company computers. This does not apply if the employee is expressly authorized by management in each case. Appropriate use of the internet and emails outside working hours is only allowed on computers designated by the employer, provided the employee does not violate their contractual duties or other general obligations, such as using illegal sites. Even on employer-designated computers for internet use outside working hours, downloading or installing software is prohibited. Likewise, any non-business file sharing and similar applications are prohibited. When opening email attachments, the trustworthiness of the sender and/or file must be ensured. Always be aware of potential threats from malicious attachments, links, or fake messages. Email links should only be opened if a threat can be absolutely excluded. Employees are obligated to handle such processes carefully. No third party should be given access to confidential data, starting with locking the computer when leaving the workplace.

Trade Secrets

The intellectual property of our company is our most valuable asset and must be protected by all employees. Likewise, we respect the intellectual property of others. Intellectual property includes copyrights, trademarks, know-how, or other proprietary information. Trade secrets about our manufacturing processes and procedures, as well as customer data and their research results/project data, are important internal information and thus company resources. Each employee is therefore obliged to protect them. The employee also agrees to keep confidential all business and trade secrets, as well as other business and operational circumstances and facts that become known during the employment relationship, even after the employment relationship ends. All BioSpring documents and records, as well as all other business documents, drawings, notes, books, samples, models, tools, materials, etc., are the sole property of the company and must be returned promptly and without request after the employment relationship ends. Retention rights are excluded. The employee further agrees not to use or disclose trade secrets known due to their activity after the employment relationship ends.

Protection of Personal Data

We strictly adhere to regulations on protecting personal data and the general right to privacy regarding personal data. Confidential information and documents about customers or employees must be adequately protected from third-party access. Personal data may only be collected, processed, or used as necessary for specified, explicit, and legitimate purposes. Data usage must be transparent to the individuals concerned. Their rights to information and correction, and, if applicable, objection, blocking, and deletion, must be respected.

Right to Free Choice of Employer

BioSpring respects employees' human rights and treats them with respect and dignity, according to the fundamental rights of every human being. This is also expected from all employees towards each other. We condemn forced labor, including debt bondage, involuntary prison labor, slavery, and human trafficking. The human resources department ensures that all employees on site have freely chosen to be there and are fully paid for their work. Working hours and break times follow customary company practice and needs, in compliance with German working time laws. Employees can move freely during their break times. Employees are free to resign within a reasonable notice period while continuing to receive all employer benefits. Employees do not pay "deposits" to secure a job or employer-provided accommodation, nor do they pay excessive "deposits" for tools, training, or personal protective equipment required for their safe work performance.

Child Labor and Young Employees

BioSpring does not employ children under 15 years of age. Employees under 18 are only employed in non-hazardous work and only if they exceed the country's legal employment age and the age set for completing compulsory schooling. Hazardous work includes handling chemicals or strenuous physical work and night shifts. BioSpring complies with the Youth Employment Protection Act requirements.

Compensation

Employees receive appropriate compensation for their work according to applicable laws. Compensation is agreed upon in the employment contract between BioSpring and the

employee. Payment is due on the last day of the month and is electronically transferred by BioSpring to the domestic account provided by the employee. Monthly compensation is at least the statutory minimum wage. Any allowance, gratuity, bonus, premium, or other special compensation is voluntarily paid without any legal entitlement. Even repeated payment does not create a future legal claim. Employees receive a written payslip. They can contact the human resources department anytime with questions.