

Code of Conduct for Employees of STADA Group



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Message from the STADA Executive Board

Dear colleagues,

The care of health and well-being of people is the center of our business. Our standards of business conduct express the high standards of integrity that we require from all of our employees and colleagues worldwide. We all have a personal responsibility to uphold and foster the standards that we set for ourselves and to act in a way that maintains and improves the reputation of STADA Group (STADA). Each employee needs to act in accordance with the values and principles set out in this Code of Conduct and in doing so to contribute to our ongoing success. We all can help to ensure our company to be an organization for which we are proud to work.

For a globally acting company such as STADA, it is essential to combine success and responsibility as only this combination ensures that we remain a valued long-term business partner and an attractive employer.

With this Code of Conduct, we have defined a set of values and principles to guide us in acting responsibly and in making decisions in our day-to-day work.

Yours sincerely



Peter Goldschmidt
(Chairman of the Executive Board)



Mark Keatley
(Chief Financial Officer)



Miguel Pagan Fernandez
(Chief Technical Officer)

About this Code / Introduction

This Code of Conduct is applicable to all employees and members of the Executive Board (“employees”) of STADA Arzneimittel AG and all national and international affiliated companies controlled directly or indirectly by STADA Arzneimittel AG (“STADA”). It shall serve as a guideline for our daily work and stipulate an essential framework of conduct.

STADA is committed to comply with all applicable laws and regulations. As these may vary from this Code of Conduct in some countries, as a matter of principle, the stricter provision needs to be followed. In addition, STADA’s global policies provide further details and specifications to many of the topics covered in a general manner by this Code of Conduct. Knowledge of these policies and adherence to them is mandatory as well.

Violations of this Code of Conduct can result in loss of trust, reputational and economic damage but also in criminal prosecution. Within STADA, we will not tolerate any violation of this Code of Conduct and it may result in disciplinary measures up to the termination of the employment.

In general, always ask yourself:

- Is my conduct or decision lawful?
- Is it in keeping with our Code of Conduct?
- Is it correct and free from personal conflicts of interest?
- Do my actions protect the role STADA plays in society?
- Would I feel comfortable if my personal conduct were made public?

If your answer is NO to any of these questions or in case you have any other questions on this Code of Conduct please do not hesitate to contact the departments or persons mentioned as contact information at the end of this Code of Conduct (“Point of Contact”).

Principles of Conduct for Employees of STADA

Fairness and Respect

The interaction of employees and management is characterized by tolerance, respect, objectiveness and fairness towards one another. Appreciation of all employees is a sign of our openness and tolerance – and absolutely indispensable for STADA as an international company.

We respect the individual personality of each employee and reject any kind of discrimination or harassment. We promote equal opportunities within our company and reject any kind of discrimination.

Protection of the Environment, Health and Safety

STADA is committed to protecting people and the environment and continually works towards improving procedures and processes in order to minimize any environmental impact and health risks. Every employee of STADA shares such responsibility of ensuring the careful management of these resources and must comply with all relevant laws. If, despite all precautionary measures, people or the environment are harmed, every employee must immediately report this to his Point of Contact, so that appropriate countermeasures can be taken and/or the competent authorities can be informed.

Quality and Safety of Products

As a company belonging to the pharmaceutical industry, we mainly focus on the production and supply of safe and effective products, which aim to help patients.

The excellent reputation of STADA within the market relies on the high quality products we produce and sell. For the maintenance of this reputation in the future, we expect STADA employees to support the quality and the safe use of our products. In particular, this means that the regulatory obligations towards the respective authorities have to be observed, that any complaints with regard to product quality are reported to the responsible unit (e.g. Quality Assurance Department) and that safety-related information (e.g. adverse reactions, abuse/misuse, overdose, exposure during pregnancy) is immediately reported to the Pharmacovigilance Unit.

Personal Data Protection

We respect privacy rights of our employees, customers and other stakeholders and process personal data for specific business purposes only and secure those data against unauthorized access. STADA takes all necessary action to treat personal data confidentially and only collect, process and store data according to the provisions of the applicable data protection laws.

Protection of Assets and Information Security

The property of STADA is crucial to the success of the company and is, therefore, especially worthy of protection. The property of the company does not only include tangible assets such as machinery and buildings, but also intangible assets such as patents, know-how, trademarks, copyrights, scientific and technical expertise, business processes, etc.

Many of these assets are confidential and are considered business secrets of the company. These business secrets must be protected especially against access by a third party. The same applies to information that STADA receives from a third party and uses for its business operations; this information, too, must equally be kept confidential and protected against access by a third party.

Therefore, every employee must treat the property of the company and the property of a third party that was made available to or was entrusted to STADA with care, to protect it against access by any third party and to use it only for the legitimate purposes for which it was intended. All employees must use confidential information that they become aware of in the course of their work only for the purposes of their professional activity for the company and not for personal purposes.

Information, processes and the supporting systems are of significant value to the STADA Group. The protection of information is an important duty of all STADA employees. Each member of STADA must protect any information that is not in the public domain without need of establishing further obligations such as marking-up such information as confidential.

All of STADA's employees are to report any situation that suggests that the protection or confidentiality of sensitive information may have been compromised.

Antitrust and Fair Competition

STADA is committed to a free, fair and undistorted competition. As a result, STADA expects its employees to act in accordance with antitrust laws. Such laws prohibit, in particular, agreements and concerted practices between competitors that may limit, prevent or falsify competition unlawfully (e.g. price-fixing agreements, improper restrictions of quantities to be produced or markets to be entered, undue customer allocations, division of markets etc.).

No matter the business situation, STADA employees must always be aware and comply with applicable laws and regulations and adhere to the principle of fair competition.

Interaction with Third Parties

Just as in our day-to-day behavior to one another, we expect the same conduct towards and from all of our stakeholders. Business relations with a third party are to be based on quality, reliability, competitive pricing and other objective factors, but not on unlawful behavior. This includes – among others - that we market and sell our products in accordance with all applicable rules and regulations and that we refrain from any use or support of compulsory labor and exploitative child labor.

We also expect our business partners to comply with the law and therefore select all of our business partners carefully. In this regards, our employees are expected to comply with all applicable law and regulations, in particular regarding embargos, sanctions and anti-money laundering.

Anti-Corruption

Employees are forbidden to unlawfully demand, let promise, accept, offer, promise or grant any benefits in direct or indirect connection with their professional activities. This is especially true with respect to the initiation, awarding or execution of contracts of any kind.

STADA will not tolerate any kind of corruptive behavior.

Special caution is necessary when dealing with healthcare professionals (HCPs), such as physicians, pharmacists, nurses or others who may influence the use of our products. As a pharmaceutical company, STADA strongly emphasizes the collaboration with doctors and pharmacists and members of expert groups and their institutions. Our collaboration has several facets and ranges from the evaluation of the secure and efficient use of our products to the enlistment of doctors regarding specific medicinal questions by means of consultancy agreements.

What is permitted depends to a high extent to national rules and regulations, which need to be strictly followed and specified in internal policies. Depending on national laws, we may provide e.g. modest meals or occasional gifts of small value.

The overall principle is that our business must be carried out in an open and transparent manner in order to avoid even the mere impression of inappropriate influence.

As part of this, any kind of grants to HCPs may be subject to disclosure obligations according to applicable rules and regulations.

Avoidance of Conflicts of Interest

STADA employees have to clearly and unmistakably separate their own, private interests and those of the company at all times. In particular, this separation has to be taken into account with regard to the selection of business partners and in case of any staffing decisions.

Each employee must act in the best interest of STADA and not pursue any business opportunities for personal advantages. Any situations when personal or financial interests of the employee or third parties close to the employee interfere with STADA's interest need to be reported to the supervisor and documented.

Insider Trading

If confidential information involves information that, should it become public knowledge, could substantially affect the trading or market price of STADA shares, such information is known as insider information, the exploitation or passing on to third parties of the same is forbidden by law. The term of "third parties" also includes e.g. family members or friends.

Relationships with governments, community and the Public

All press inquiries regarding STADA as a group or affecting it must be referred to the department "Corporate Communication". As a matter of principle, inquiries regarding group matters may be answered only by employees, which have the explicit permission to do so.

Inquiries regarding individual subsidiaries and/or their business operations may be answered independently by their managing directors or their specifically authorized spokespeople in compliance with the internal corporate policy provided that any impact on the interests of the group can be ruled out.

In case of significant inquiries or investigations from public authorities, the respective legal department or, on a STADA group level, the Corporate Legal Department, must be involved as early as possible. In coordination with said legal department and as a general rule we expect full cooperation with the authorities.

All direct or indirect donations to political organizations, parties or individual politicians must be within the boundaries set by law and must be approved by Corporate Communications.

Communications and Social Media

It is important that our private activities do not interfere with our responsibilities to STADA. Expressing personal opinions must not imply any connection with the opinion or position of STADA. This applies regarding all statements of employees, especially on Social Media platforms. Also regarding social media, the conduct of STADA employees must always be based on respect, confidentiality, authenticity, transparency, loyalty and honesty and be free of any discrimination.

Financial Integrity

For corporate purposes we provide accurate and transparent financial information in accordance with International Financial Reporting Standards (IFRS). On the country level the same quality of information is given pursuant to local generally accepted accounting principles. We maintain effective controls over financial reporting to ensure an accurate record of our financial transactions.

Being a globally operating company, we are obliged to comply, both with national and international tax regulations.

We explicitly oppose any kinds of misuse of tax evasion structures and are not supporting any acts of customers, business partners and employees to mislead tax authorities.

Contact information

If you have any questions regarding one of the principles outlined in this Code of Conduct, please don't hesitate to contact the following contact points ("Point of Contact"):

- Your Manager
- Corporate or local Compliance Department
- Corporate or local HR Department
- Corporate or local Legal Department

If you have observed or suspect a violation of the provisions of this Code of Conduct, please also contact the above-mentioned persons / departments.

For all employees in Germany, there is also an ombudsman available. He may take your report anonymously and advise you on possible further steps.

His contact details are available on STADA Intranet or Internet.

STADA is committed to treat all reported incidents confidential and serious. Your report will be reviewed and evaluated. There will be no any retaliation for making a good faith report of actual or potential misconduct.