Gerolymatos International

Code of Conduct & Ethics

Gerolymatos International®

Serving health care since 1923

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1. Introduction

1.1. The Company

Gerolymatos International has been active in the health sector since 1923 and is one of the oldest, traditional, well-established family businesses in the Greek pharmaceutical market. Based in Athens, with a network of subsidiaries in France, Italy and Cyprus, it has a significant presence in more than 50 countries worldwide through its network of representatives distributing its proprietary products.

The Company has a strong presence on the Greek domestic market, serving customers through the OTC sector, Pharmacies, supermarkets and organic stores, representing the Company's proprietary products and a wide range of recognisable products for which it is the exclusive distributor. It also holds a leading position in the Optics Sector in Greece with the exclusive distribution for Alcon Eye Care products, as well as in the Veterinary sector where it is the exclusive distributor of Boehringer Ingelheim pharmaceutical products and Affinity Petcare clinical nutrition products.

In addition to its emphasis on corporate responsibility, sustainable development and sound corporate governance, Gerolymatos International focuses on cultivating a corporate culture based on trust, respect, responsibility and integrity, while focusing on people, social well-being, excellent customer service and environmental protection.

1.2. About the Code

The Company's priority is the creation of a competitive, diverse and meritocratic working environment, which is driven by the employees themselves, while its long-term objective is to operate on the basis of high standards of ethical and responsible professional conduct. The purpose of this Code of Conduct and Ethics (hereinafter "Code") is to promote a sound, responsible and transparent corporate culture at Gerolymatos International, which encourages behaviours and practices that are in line with the best principles of business ethics and conduct, as well as with the applicable legislation. The Code includes the fundamental principles and standards of ethical conduct that frame the daily behaviour and practice of Gerolymatos International's staff, as well as the way in which the Company conducts its business activities with its partners and the stakeholders of the Company.

The Code is addressed to, concerns and binds the Company's employees, the Board of Directors as well as its direct partners, who operate on behalf of the Company, either through the outsourcing of services or through an exclusive cooperation relationship. This code has been developed based on the OECD guidelines for multinational enterprises and is in line with the guidelines of the international standard for Social Responsibility ISO 26000. Some references or articles in this Code may also derive from laws or relevant regulations.

2. Principles of responsible operation

Where Gerolymatos International is concerned, responsible and ethical professional conduct is not only linked to regulatory and legislative compliance, but is also governed by a framework of principles that

are a vital part of the organisation and its responsible operation and development, in a spirit of trust, respect, ethics and integrity.

The Company's framework of principles, which is described below, reflects the way we operate and evolve, while also defining the way we collaborate and interact with partners, suppliers and other stakeholders of the organisation.

- **Trust:** Trust is a key principle for us, built through the development of mutually respectful partnerships. The relationships we develop with our customers, partners and other stakeholders are governed by transparency, honesty and mutual trust.
- **Respect:** Respect for Gerolymatos International's employees, first and foremost, but also for our customers and all our partners, is of utmost importance in developing and maintaining healthy and open relationships.
- **Integrity and ethics:** Integrity and ethics are qualities that characterise us in all our business activities. We operate on the basis of honesty and consistency in word and deed, and with accountability for our commitments.
- **Transparency:** We operate in a responsible and transparent manner, in terms of our practices and governance, seeking to safeguard the interests and therefore the trust of our stakeholders.
- **Responsibility:** We act responsibly in all aspects of our activities. We demonstrate responsibility towards people, society and the environment. Our actions and activities are aligned with the needs of the local and global communities in which we operate. We base our operations on sustainable growth and accountability to our stakeholders and our people through a resilient business model.
- **Quality, excellence and innovation:** We strive to be the best, maintaining our competitive advantage, with our high quality and innovation of our products at the forefront. We adopt and implement standards and reliable policies and procedures. We work as a team, while recognising excellence at an individual level.
- **Meritocracy:** As well as being a principle, promoting meritocracy is a commitment for us, as it is directly linked to fair pay, equal treatment and offering equal opportunities to all our employees. In addition, we are committed to pursuing fair transactions with our customers, suppliers and other partners, with meritocracy and always respecting the principles of fair competition.
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- **Teamwork:** We seek continuous and seamless cooperation and synergy between colleagues and teams from all our departments. Our ultimate goal is continuous improvement and personal and professional development through the valuable exchange of information and the diffusion of know-how among our highly qualified

3. Standards of ethical and professional conduct

In accordance with Gerolymatos International's operating principles, within the framework of this Code the Company has set specific standards of ethical and professional conduct that will ensure the company operates responsibly and seamlessly.

3.1. Regulatory compliance issues

Fraud prevention

In accordance with the Company's operating principles which are based on the achievement of integrity and responsibility, Gerolymatos International is committed to maintaining a culture of ethical behaviour and, therefore, does not tolerate any fraud. The Company implements specific ways through which employees or other stakeholders of the organisation can report suspected fraud. The ultimate responsibility for ensuring the above lies with the Company's Management, while the individual directorates, departments and employees of the Company must comply with the aforementioned.

Conflict of Interests

Gerolymatos International defines conflict of interest as any situation in which the ability of an employee of the Company to independently and fairly evaluate, judge or make a decision is or may be affected by a personal interest, or the authority or pressure of a third party, resulting in a potential risk to the interests and reputation of the Company.

All employees, including management, must regulate their personal or other external activities and financial interests in such a way as to ensure that there is no conflict of interest of any kind with Gerolymatos International. Employees are required to inform their supervisors in a timely manner of any relationship with individuals or companies with whom Gerolymatos International has business dealings that could lead to a conflict of interest. These relationships include blood or family ties, cooperation or investment.

Bribery and corruption

Workplace conduct and practices that involve bribery and corruption are not only serious criminal and civil offences, but are also contrary to Gerolymatos International's principles of responsible operation. Displaying such conduct may result in high fines and civil liability for the individuals involved, and may also significantly damage the Company's reputation and value in the marketplace.

Therefore, in our Company it is strictly prohibited to engage directly or indirectly in any practice of corruption, or illegal professional activity or bribery. In compliance with the applicable laws and regulations, we do not offer or accept any financial inducement, gift, reward or bribe to influence or reward the decisions of our business partners. In addition, the Company does not allow any kind of activity related to money laundering or illegal financing.

Gifts and other types of donations

A bribe is the acceptance of any item or amount of money intended to influence a decision or to provide an unfair advantage. With regard to other types of gifts or donations, which may be in the form of gifts or invitations, the Company does not allow them to be accepted in any case where the integrity and

honesty of the organisation and the employees may be questioned or their professional judgment and decisions may be affected.

3.2. Information Management

Data and confidential information protection

Gerolymatos International takes its information seriously and protects it, and respects the information provided by third parties. The Company uses the term "confidential information" to define all information which has not been disclosed or is not available to the general public and which concerns, by way of a non-limiting example, financial, technical, contractual, personal data of employees and customers/partners, plans for acquisitions/mergers and significant management changes or generally information concerning the development and strategy of the Company. Gerolymatos International employees must handle confidential information and personal data with care, honesty and discretion, both during and after their cooperation with the Company.

Information System Safety

The Company offers the highest level of protection for corporate information to ensure that the interests of the organisation and of its stakeholders, and the broader competitiveness and sustainability of the Company are protected. In view of the above, for Gerolymatos International the integrity of its information systems is of fundamental importance as they ensure any data, personal or professional, are protected from unauthorised access, loss or manipulation. In this context, the protection of the security of information stored and circulated in the Company's IT systems is a duty of all employees of the Company, including at an individual level. Gerolymatos International applies all necessary practices and measures to ensure the above.

Respect for natural and intellectual property rights

Gerolymatos International applies a framework of specific procedures for the respect of rights relating to physical and intellectual property. In particular, through specific references in the contracts and agreements that it draws up and mutually accepts with its partners, it ensures that these rights are properly managed and respected, and - where applicable - seeks to obtain fair compensation for the property it purchases or uses.

3.3. Protecting the Company's assets

In order to protect corporate assets the Company expects its employees to manage the organisation's assets responsibly and properly and only for the intended business purposes. Each employee must protect the Company's property from loss, damage, misuse, theft or destruction, and report immediately to the appropriate parties any events that may lead to loss, damage, misuse, theft or destruction of Gerolymatos International's assets.

3.4. Responsible working environment

Occupational Health and Safety

Protecting health and providing a safe working environment is of vital importance to Gerolymatos International. The Company ensures the correct and systematic implementation of health and safety measures, in accordance with the existing national legislative framework and best practices. In this context, the Company focuses both on the effective response to health and safety incidents and the timely preventive management of health and safety risks, while, at the same time, it conducts systematic training for employees on relevant issues.

Human rights, equality and diversity

Our employees are the driving force behind Gerolymatos International. In today's competitive business environment, it is important for us to staff our organisation with people with a variety of skills, talents and abilities, and a work ethic that is consistent with our principles. With this in mind, the Company supports diversity in the workplace, and seeks to understand the diversity of its people. At the same time, we are committed to respecting and promoting human rights in accordance with the 10 Principles of the United Nations (UN Global Compact). The Company does not discriminate on the basis of gender, religion, age, disability, nationality, beliefs and other personal characteristics in the recruitment, evaluation and further development of its employees.

Combating discrimination, violence and harassment at work

The Company expresses its explicit and unconditional commitment to addressing and eliminating discrimination, violence and harassment in the workplace, with the ultimate goal of a meritocratic working environment where respect for human dignity prevails. The Company strictly prohibits all forms of discrimination, violence and/or harassment which occur during the course of work and any misconduct that is related to or may result from it. If any Gerolymatos employee or associate believes that he or she has been subjected to discrimination, violence or any form of harassment, or if he or she has witnessed such behaviour taking place in the work environment, he or she must follow the steps of the Company's Reporting Procedure to report the incident.

We have developed and put in place the appropriate mechanisms to conduct a fair, timely, thorough and objective investigation, following our Management and Internal Reporting Investigation Procedures. In this context, we take all necessary measures to ensure the cooperation of all parties involved, employees or third parties, in accordance with this procedure.

More information is available in the Company's Internal Working Rules.

Training and development of employees

The Company encourages continuous professional training and provides personal development opportunities to all its employees, aligning their personal needs and expectations with the organisation's goals. In this context, it offers training and development programmes for its people so that they can achieve their personal goals and provide maximum value to the Company.

3.5. Corporate responsibility and social contribution

Corporate responsibility is not just a principle of responsible operation for Gerolymatos International, but a necessary condition for the responsible operation and sustainable development of the Company. It is important for our organisation to align its actions with the needs and expectations of its stakeholders

and the societies in which it operates. For this reason, we develop a systematic and constructive dialogue with them, with the aim of creating stable trust-based relationships, in order ensure they are informed in a timely manner about the issues that concern them.

At the same time, with a sense of responsibility towards people and the society in which we operate and develop, we plan actions to actively contribute to addressing social problems, in cooperation with recognised social institutions and organisations.

3.6. Protection of the Environment

We seek to thrive in a competitive and changing global business environment by anticipating and effectively managing current and future challenges and opportunities. We aim to protect the natural environment and create value through positive environmental outcomes, minimising the impact of Gerolymatos International's activities on the environment and taking initiatives to promote environmental responsibility. We monitor and control on a systematic basis any environmental risks arising from our activities.

3.7. Transparency and accountability

The Company seeks transparency in its financial and non-financial disclosures, providing timely, truthful information that is transparent, relevant, comprehensive and accurate. All Company financial transactions are always recorded and published in accordance with generally accepted accounting standards and principles and the accounting records present the nature of the transactions fairly and not misleadingly. In addition, the Company ensures the publication and integrity of non-financial information on an annual basis, which is vital for transparency in relations with the organisation's stakeholders and for proper communication with them.

4. Implementation, monitoring and amendment of the Code

4.1. Distribution of the Code

The Code is available to all employees of Gerolymatos International, members of the Board of Directors and all direct associates and is given to them at the time of their recruitment, approval and commencement of their cooperation with the Company, respectively. All employees, representatives and associates of the Company, as defined in paragraph 1, must respect and follow the provisions of this Code of Conduct and Ethics.

4.2. Violations

The Company expects its employees, as well as those covered by this Code, to report any violations of the Code when they become aware of them or when they are brought to their attention. Stakeholders

may anonymously express any concern or worry or report a violation of the Code through the complaints and grievance procedure as described in the Rules of Procedure.

In cases of violations of the Code, an investigation of any incident will be carried out, while maintaining the confidentiality of the relevant information, unless otherwise provided by the applicable law. Please note that any violations of this Code found may even lead to administrative actions, as defined by law, including the termination of the relationship with the Company.

4.3. Monitoring and amending the Code

The Code is reassessed and updated in accordance with the current legal framework and national and international standards. The Human Resources Department, in cooperation with the Company's Management, is responsible for its monitoring and review.