

Sustainability Code of Conduct for Business Partners of Gedeon Richter Plc.

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1. Introduction

Gedeon Richter Plc. (hereinafter: the "Company" or "Richter"), together with its subsidiaries and affiliates, conducts its operations in alignment with consistently high ethical, social, and environmental standards. Its business activities are governed by applicable laws, relevant industry requirements, and internal policies. The Company's mission is to serve human health, which guides decision-making and defines the responsibility it bears toward society, patients, and all stakeholders.

Richter believes that long-term success is grounded in integrity, responsible business conduct, and trust. Accordingly, the Company collaborates exclusively with partners who comply with laws and regulations, respect human rights, adhere to environmental and labour standards, and strive to meet the highest expectations for quality and safety.

2. Aim of the Policy

To promote responsible and sustainable business practices and ensure consistent and transparent expectations towards business partners, the Company considers the principles set out in this document as the foundation of cooperation. Business partners are expected to comply with these principles in their own operations and, where feasible, throughout their supply chains.

3. Principles of the Policy

3.1. Ethical Business Conduct

3.1.1. Anti-corruption and Bribery

Richter expects its partners to actively prevent and reject all forms of corruption in their operations and to maintain appropriate measures and internal procedures to manage corruption risks. The Company does not tolerate corruption of any kind, including bribery, extortion, influence peddling, or the granting of undue advantages.

Richter expects its business partners to:

- Prohibit offering, accepting, or requesting any undue advantage on behalf of Richter;
- Ensure that payments made by Richter are never used to improperly influence decisions;
- Act transparently and free from inappropriate influence, including in relation to gifts and hospitality.

Richter reserves the right to verify compliance with these requirements. Adherence is mandatory even if such measures may result in a competitive disadvantage.

3.1.2. Conflict of Interest

Richter's partners shall not establish or maintain relationships with individuals employed by Richter (hereinafter: "employees") that may result in a conflict of interest. In particular, they shall:

- Refrain from any relationship with Richter employees or other parties that could jeopardize the Company's legitimate economic interests create a conflict of interest or give the appearance of improper influence over business decisions;
- Avoid employing Richter employees except where agreed as dual employment and avoid providing them investment or ownership interests in the partner's company except where publicly traded shares are acquired.

Business partners are responsible for avoiding and disclosing any situation that may constitute or appear to constitute a conflict of interest.

3.1.3. Fraud Prevention and Anti-Money Laundering

Richter expects its business partners to:

- Support efforts to combat fraud and refrain from fraudulent business practices;
- Never engage in business that supports criminal activities involves proceeds of crime conceals the origin of funds or contributes to the financing of terrorism;
- Comply with and implement applicable anti-money-laundering regulations;
- Take reasonable proportionate and risk-based measures aligned with their size and exposure to identify their own business partners and assess their integrity.

3.2. Labour Rights and Human Dignity

3.2.1. Human Rights

Richter expects all its business partners to respect human rights as defined in applicable international conventions, local laws, and regulations, and to ensure fair treatment of workers throughout their supply chains without any form of abuse.

Partners shall pay particular attention to the following:

- Respect for the right to life and dignity, liberty and security of person, and the highest attainable standard of health;

- Prohibition and prevention of human trafficking, child exploitation, forced labour, and any form of harsh or inhumane treatment of workers;
- When private or public security personnel are engaged, ensuring that the human rights of workers and other individuals are respected and preventing any unlawful physical or mental harm;
- Respect for the freedom of expression, religion, and freedom of association.

Partners shall take into account the Universal Declaration of Human Rights and the Fundamental Principles and Rights at Work of the International Labour Organization (ILO) in the course of their operations.

3.2.2. Fair Employment Practices

Richter expects its business partners to:

- Provide fair wages and working conditions, ensure lawful employment contracts, and avoid any form of undeclared work;
- Comply with applicable labour standards including rules on working hours, rest periods, and paid leave;
- Respect workers' rights to representation and refrain from restricting or interfering with the exercise of such rights.

3.2.3. Human Dignity, Equal Treatment and a Harassment-Free Workplace

Richter expects its partners to ensure equal access to employment opportunities and a workplace built on mutual trust, where every individual is valued, and human dignity is always respected.

Richter expects its business partners to:

- Treat workers equally regardless of personal characteristics including but not limited to race, ethnicity, skin colour, religion or belief, origin, gender, sexual orientation, age, gender identity or expression, nationality, marital or parental status, pregnancy or related health conditions, genetic traits, military status, health status, or any other characteristic protected by applicable laws;
- Refrain from any conduct that may be perceived as hostile, intimidating, offensive, malicious, or humiliating;
- Prevent harassment, sexual harassment, defamation, discrimination, and any act that constitutes a violation of human dignity;
- Ensure that communication in all forms is respectful and does not contribute to the creation of a hostile work environment.

3.3. Health and Safety

Richter expects its business partners to provide a safe and healthy working environment for all workers and to take proactive measures to prevent work-related injuries and illnesses.

Richter expects its business partners to:

- Comply with all applicable occupational health and safety laws and regulations;
- Ensure that workplaces and equipment are maintained to prevent accidents and health risks;
- Implement, where possible, an occupational health and safety management system that is considered a positive practice in cooperation with the Company;
- Provide workers with adequate training and protective equipment to perform their work safely;
- Establish effective procedures for incident reporting, investigation, and follow up;
- Take measures to prevent substance abuse and ensure fitness for work;
- Ensure ergonomically appropriate working conditions for both office-based and physical work;
- Ensure the protection of pregnant workers and workers with specific health needs.

3.4. Environment and Resource Management

Richter is committed to environmental sustainability and expects its business partners to act in accordance with the principles of environmental responsibility throughout their operations. This includes responsible resource use, waste reduction, and prevention of pollution.

Richter expects its business partners to:

- Comply with applicable environmental regulations and permits;
- Establish and operate an environmental management system appropriate to the nature and scale of their activities;
- Reduce emissions and environmental impacts associated with their activities;
- Minimise waste generation and ensure environmentally sound waste management;
- Use energy and natural resources efficiently and seek opportunities to improve environmental performance;
- Use renewable energy sources where possible;
- Take measures to reduce greenhouse gas emissions;
- Prevent and manage spills discharges and other environmental incidents;
- Promptly report any significant environmental incidents to the Company;
- Prevent soil and groundwater contamination during the performance of their activities;
- Take climate-related risks and impacts into account in their operations where relevant;
- Encourage sustainable practices within their supply chains;
- Apply a life-cycle perspective when assessing environmental impacts over the entire life cycle of products or services;
- Strive for sustainable sourcing including the preference for recycled or renewable materials and the adoption of sustainability best practices.

3.5. Responsible Procurement Practices

3.5.1. General Expectations Towards Business Partners

Richter follows responsible procurement practices and expects its business partners to do the same. In addition to complying with legal requirements business partners shall strive

to reduce social and environmental risks in their procurement activities and throughout their supply chains taking into account the nature of their operations.

Business partners are required to cooperate in a reasonable and proportionate manner in Richter's sustainability due diligence processes and to provide relevant information particularly regarding environmental and human rights risks in accordance with applicable legislation.

3.5.2. Fair Trade and Competition

Richter is committed to fair market conduct and expects its business partners to carry out their activities in full compliance with applicable competition laws and fair business principles.

Richter expects its business partners to:

- Not obtain use or disclose information related to the business operations of others in an unfair manner;
- Not enter into agreements with Richter subsidiaries affiliates or any third party that restrict prevent or distort competition.

Business partners that provide services to consumers must comply with applicable consumer protection regulations. They shall conduct their activities in accordance with the spirit and principles of these rules and always respect consumers' rights and interests avoiding any infringement or endangerment of such rights and interests.

3.6. Quality Requirements

Richter continuously strives to ensure that its products and services meet the most stringent quality requirements. The Company operates in compliance with applicable regulatory requirements and its own strict internal quality standards and expects its business partners to fully comply with all quality and safety requirements applicable to their activities.

Richter expects its business partners to:

- Strive to ensure the highest possible level of quality product safety and service reliability and fully comply with all applicable laws regulations and standards;
- Promptly and appropriately address any quality-related issues taking into account the nature of the product or service provided.

3.7. Reporting Channels and Procedures in Case of Non-Compliance

In the event of sustainability-related complaints or suspected non-compliance reports should primarily be submitted through the Compliance Hotline. The Compliance Hotline is a confidential reporting channel that supports the investigation of misconduct ethical breaches and violations of law and as part of Richter's Global Compliance Programme contributes to strengthening a corporate culture based on trust and integrity.

Compliance Hotline contact details:

- Virtual Compliance Officer (VCO HQ and European region): <https://richter.vco.ey.com/>
- Virtual Compliance Officer (VCO LATAM region): <https://richterlatam.vco.ey.com>
- Virtual Compliance Officer (VCO Australian region): <https://richteraus.vco.ey.com>
- E-mail: compliance@richter.hu
- Telephone: +36 1 431 4700

The VCO is Richter's centralised internal whistleblowing system operating as a written reporting channel. Concerns related to the expectations set out in this document particularly those of an environmental or social nature shall be reported via the VCO platform under the menu item "Corporate Social Responsibility and Environmental Risks".

The protection of reporting persons is of paramount importance to Richter. The Company ensures that reporting persons are not subject to retaliation discrimination or any other unfair treatment. Personal data of the reporting person affected third parties and individuals involved in the investigation shall be processed exclusively for the purpose of investigating the report and remedying or terminating the reported conduct and shall be accessible only to persons involved in the investigation.

In the event that a business partner its agent or any representative within its sphere of interest seriously or repeatedly violates the provisions of this document in the course of its business relationship with Richter the Company reserves the right to initiate appropriate measures in order to clarify the circumstances of the case. As part of this process Richter may conduct an investigation and in accordance with applicable laws may terminate the relevant contract or contracts and the business relationship.

3.7.1. Cooperation

Richter expects its business partners to fully cooperate in procedures aimed at identifying and managing sustainability risks and at establishing the facts in cases of suspected violations of this document. Cooperation may take the following forms:

- **Notification:** The business partner promptly informs Richter of any relevant sustainability risk non-compliance or concern;
- **Cooperation in investigations:** Full cooperation in investigations conducted by Richter including questionnaires statements and documentation;
- **Reasonable and proportionate information provision:** The business partner cooperates in a reasonable and proportionate manner in Richter's sustainability due diligence processes and provides relevant information available to it particularly regarding environmental and human rights risks in compliance with applicable legal requirements;
- **Development of corrective and preventive action plans:** The business partner develops appropriate action plans to address identified risks;
- **Implementation of measures and submission of compliance evidence:** The business partner implements the required measures and provides evidence of their implementation such as documentation or declarations.

4. Commitment

Adherence to the above principles is the right and obligation of all employees of the Company. Furthermore, the Company enforces the principles of this Policy in its contractual relationships with its business partners.

These principles serve as guidelines for the development of detailed internal rules related to the "Sustainability Code Of Conduct for Business Partners of Gedeon Richter Plc." and shall be taken into account in their practical application. Internal regulations adopted in connection with or based on this document shall be applied in alignment with the principles set out herein.

Budapest, "29" January, 2026.



Gábor Orbán
Chief Executive Officer

