

THIRD PARTY CODE OF BUSINESS CONDUCT



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General Responsibilities

At Swixx Biopharma AG, its subsidiaries, and divisions (collectively “we”, “Swixx” or the “Company”) we aim to operate in a way that reflects the highest ethical standards. We operate within a framework of principles, guidelines and policies aligned with ethical, social, and environmental responsibilities to maximize the long-term sustainability of our business and the communities in which we operate.

Accordingly, Swixx strives to conduct business with Third Party Representatives including complementary workers, suppliers, copromote entities and other business partners (collectively, “Third Party Representatives”) who share our commitment to the highest ethical standards and operate in a responsible and ethical manner.

Swixx relies on an innovative and competitive Third Party Representatives base to provide it with products and services that will meet its business requirements. Swixx employees are required to comply with the purchasing procedure and competitive bid rules, which are designed to ensure:

- Third Party Representatives are selected with a focus on best total value, including quality, sustainability, service, and cost
- Swixx intellectual, proprietary, and confidential capital is protected,
- Third Party Representatives are treated fairly and equitably,
- Worker safety and environmental stewardship are a priority.

Third Party Representatives’ integrity, honesty, and business practices can impact Swixx’s reputation. Third Party Representatives are therefore required to comply with the guidance provided in this Swixx Biopharma Third Party Code of Business Conduct (“Code”). Such compliance is required for a Third Party Representatives to be considered in good standing, and as a condition of continuing business relationship with Swixx.

Third Party Representatives are expected and encouraged to seek guidance, raise concerns and to contact Swixx to ask questions and/or report concerns on the following link compliance@swixxbiopharma.com about any potential misconduct or unethical behavior by Third Party Representatives, Swixx or their affiliated parties. The online option allows users to submit a report anonymously. Swixx is committed to non-retaliation and will maintain appropriate confidentiality and anonymity with respect to all disclosures.

By accepting Swixx’s purchase order, concluding an agreement with Swixx or otherwise agreeing to do business with Swixx, all Third Party Representatives are agreeing to comply with the standards contained herein. This Code, or the demonstration of your compliance with it, does not create third-party beneficiary rights for any Third Party Representatives. The standards set forth in this Code are in addition to, and not in lieu of, the provisions of any legal agreement or contract with Swixx, when in conflict the more restrictive or specific provision applies.

Respect of this Code by the Third Party Representatives will determine both the onboarding and the continuing commercial relationship between the Third Party Representatives and Swixx.



Business Conduct & Ethics

Swixx is a service organization and has many stakeholders. The patients, whose health and wellbeing depend on our ability to make essential medicines available to them at their moment of need, and the partners who have entrusted Swixx to represent their valuable companies and medicines in the countries where Swixx operate.

We have set high standards to ensure that our interactions with all stakeholders and wider society should be conducted in an ethical and legal manner.

Our commitment to doing the right thing, which means complying with both the spirit and the letter of the laws that govern our industry, must extend also to our Third Party Representatives. This means acting respectfully, honestly and treating each other and all our customers, partners, suppliers and consumers fairly, and with dignity.

We are committed to:

Zero-tolerance toward bribery and corruption. Swixx prohibits and has zero tolerance of all forms of bribery.

Handling personal data fairly and transparently in accordance with the laws and regulations that govern data protection and privacy, and Transparency and making full, accurate, timely, and understandable disclosures about our business.

Swixx requires that Third Party Representatives conduct their business in an ethical manner and act with integrity. The ethics elements include, but are not limited to:

Anti-Bribery/Anti-Corruption (“ABAC”)

Never participating in bribes, facilitation payments or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector. Swixx and its employees, as well as Third Party Representatives acting on behalf of the Company, can be held civilly and criminally liable for the misconduct of its partners and vendors. Swixx will conduct due diligence on selected Third Party Representatives before working with them, and manage the relationship for its duration, to ensure the activities of Third Party Representatives acting on behalf of Swixx are transparent and consistent with the Company policy.

Swixx is committed to observing the U.S. Foreign Corrupt Practices Act (the “FCPA”), the U.K. Anti-Bribery Act (2010) and the anti-corruption and anti-money laundering laws of the countries in which Swixx operates. Third Party Representatives must comply with all applicable ABAC and anti-money laundering laws, as well as laws governing lobbying, gifts, and payments to public officials, political campaign contribution laws, and other related regulations.

Conflict of Interest

Take reasonable care to avoid and manage Conflict of Interest. Notify all affected parties if an actual or potential conflict of interest arises.

Antitrust / Fair Competition

Conducting business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they conduct business. Complying with all competition and anti-trust laws applicable in the countries where the Third Party Representatives operates.

All Third Party Representatives and/or individuals acting on their behalf need to adhere to the applicable antitrust and competition laws to ensure fair trading and competition. Third Party Representatives may not, directly or indirectly, enter into any illegal agreements with their competitors nor may exchange sensitive information, e.g. regarding markets, customers, strategies, prices and the like. Third Party Representatives may participate in public tenders and private sector bidding procedures only when they strictly follow the applicable laws and regulations of the tendering organization.



Competition

Third Party Representatives shall:

- Only seek competitive advantage through lawful means and conduct their business consistent with fair and vigorous competition.
- Only engage in dialogue with competitors when there is a legitimate business reason to do so, and dialogue is such that it will not restrict competition (e.g. limited to public or non-commercial information).
- Not abuse their position, if it is dominant or has a monopoly, to exclude competitors or exploit customers.

Business and Financial Records

Honestly and accurately recording and reporting all business information and complying with all applicable laws regarding their completion and accuracy. Create, retain and dispose of business records in full compliance with all applicable legal and regulatory requirements. We expect Third Party Representatives to provide honest and accurate invoices. Invoices should be itemized, quote the purchase order number (where relevant), be supported by appropriate documentation and comply with all other requirements as set out in the relevant contract(s). Invoices may not be split to circumvent approval requirements.

Confidentiality

Never communicate externally, including in marketing presentations, anything about Swixx's prospects, performance, or policies without prior written approval from Swixx. Third Party Representatives must safeguard Swixx's confidential or proprietary information.

Intellectual Property


Comply with the intellectual property ownership rights of Swixx, as well as intellectual property rights of others including, but not limited to copyrights, patents, trademarks and trade secrets; manage the transfer of technology and know-how in a manner that protects intellectual property rights.

Marketing and Promotional Practices

Maintain only marketing and promotional materials and activities that conform to high ethical, medical, and scientific standards, and comply with all applicable laws and regulations. Promotional materials and activities that mention the products or services of Third Party Representatives must fairly and accurately represent those products and services. Use of Swixx's name, trademark and any representations of our products or services are prohibited unless written authorization has been provided by Swixx's legal department.

Data Privacy and Security

Comply with all applicable privacy and data protection laws and regulations related to the collection, use, disclosure, destruction or otherwise processing of personal information. Third Party Representatives must have documented, implemented, and maintained a written information security and privacy program containing the appropriate administrative, technical and organizational measures, procedures, and other safeguards, appropriate to the size and complexity of the Third Party Representatives operations, the nature and scope of its activities, and the personal information involved, to protect personal information against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access, and against all other forms of unlawful use or processing, including, but



not limited to, unnecessary collection or further usage or processing. Third Party Representatives use, and disclosure of personally identifiable information must be limited to those purposes for which they are engaged by Swixx and as required by the law to ensure that individuals' privacy rights are protected. Personal information means any information relating to an identified or identifiable person.

Patient Safety and Access to Information

Ensure that adequate management systems are in place to minimize the risk of adversely impacting the rights of patients, including their rights to health and access to information directly.

Sub-contractors

Having a program in place to support compliance by their own suppliers and subcontractors (including but not limited to any intermediaries, agents, distributors or any other business partners) with the standards set forth in this Code.

Trade Sanctions, Export Controls

Third Party Representatives must be committed to importing, exporting and engaging in all other forms of trade in a legal and ethical manner.

Third Party Representatives shall identify and comply with applicable trade sanctions import and export controls of laws, including but not limited to US, EU and Swiss trade sanctions laws and other trade compliance laws of the country(ies) where the transactions occur(s), or which may otherwise have jurisdiction over the transaction.

Artificial Intelligence

Use Artificial Intelligence in a responsible and ethical way that is inclusive, safe, protects against bias, respects the privacy of Personal Information, provides transparency, and empowers humanity.



Quality Standards & Assurance

Third Party Representatives shall consistently provide high quality goods and services in a timely manner and in compliance with all applicable regulations and contractual obligations.

At Swixx, quality is a shared responsibility and fundamental value. Swixx adheres to sound scientific and quality principles and ensures that these principles are reflected in all our operations. In support of this commitment, Swixx complies with all applicable requirements related to Good Manufacturing Practices (GMP), Good Pharmacovigilance Practice (GVP), Good Distribution Practices (GDP) ISO requirements and other relevant regulatory frameworks.

We are committed to:

- Delivering safe and reliable products that meet or exceed the requirements of our patients, customers and regulatory requirements
- Complying with all applicable regulatory requirements in the jurisdictions where we operate
- Establishing, maintaining and continually improving an effective Quality Management System
- Ensuring the integrity, accuracy and reliability of our data through the product and service lifecycle
- Upholding our individual and collective accountability for quality at all levels of organization.

Where applicable, Third Party Representatives supplying Swixx with materials or services must comply with the quality requirements as mutually agreed upon with Swixx. Third Party Representatives must ensure appropriate communication mechanisms between Swixx's Quality organization and Third Party Representatives ensure that materials and services supplied to Swixx comply with Swixx requirements and meet all applicable regulatory requirements. Third Party Representatives is expected to supply all aspects of the materials or services (e.g., labor, supervision, equipment, materials, supplies, licenses, permits, and all other requirements necessary to supply the materials or services) in compliance with this Code, and in accordance with the agreed-upon quality criteria and agreements executed between Third Party Representatives and Swixx.

Third Party Representatives shall implement and maintain Quality Management System appropriate to the nature and scope of services perform for Swixx. The system shall ensure that all materials and services supplied to Swixx conform to specified requirements and adhere to current quality guidelines and regulations (GxPs) as set forth in the European Health Authority requirements and other local regulations, where applicable.



Human Rights and Labor Standards

Swixx is committed to uphold, protect and promote human and labor rights of individuals connected to its operations and business relationships. Therefore, Swixx expects its Third Party Representatives to treat their own employees ethically, fairly and in accordance with local laws, regulations and with international human and local labor rights standards.

The labor standards include:

Freely Chosen Employment

Third Party Representatives shall not use forced labor, including, bonded, indentured or involuntary prison labor or engage in any form of slavery or human trafficking.

Make recruitment practices cost free, with no fees to the applicant.

Prohibition of Child Labor

Third Party Representatives shall not use child labor. “Child labor” refers to the employment of any person under the minimum age for employment in the country, or under the age for completing compulsory education—whichever is highest. The employment of young workers under the age of 18 shall only occur in non-hazardous work, and only when such workers have reached both the legal minimum age for employment and the age for completing compulsory education. Young workers should not be engaged in night work, overtime, or any work that may jeopardize their health, safety, or morals.

Anti-Slavery

Third Party Representatives shall not tolerate human trafficking or slavery, and they are committed to act with integrity in all of their dealings and business interactions with any individual being Third Party Representative employees, consultants, and agents. The Third Party Representatives may not use misleading or fraudulent practices during the recruitment of employees and child labor may not be used in any part of their company or their suppliers.

Non-Discrimination and Fair Treatment

Third Party Representatives shall provide a workplace free of harassment and discrimination. Discrimination for reasons such as race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status must not be tolerated. Third Party Representatives shall provide a workplace free of and no threat of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuses of workers.

Working Conditions


Third Party Representatives shall remunerate and compensate their workers in accordance with the applicable wage laws, including those governing minimum wages, overtime pay and legally mandated benefits. Workers shall be informed, in a timely manner, of the basis on which their compensation is determined. Third Party Representatives shall also clearly communicate with their workers whether overtime is required, and the applicable wages rates s for such overtime work.



Freedom of Association

Open communication and direct engagement with workers to address workplace matters are encouraged. Third Party Representatives shall respect the rights of workers, in accordance with applicable local laws, to freely associate, join or refrain from joining labor unions, seek representation and join workers' councils or other lawful forms of worker representation. Workers shall be able to communicate openly with management regarding working conditions and other employment-related concerns without fear of reprisal, intimidation, discrimination or harassment.





Environment, Health, Safety & Sustainability

Third Party Representatives shall comply with all applicable health programs and systems in place to provide workers with safety information relating to hazardous materials and education to protect them from potential hazards. Hazardous materials can include but are not limited to raw materials, isolated intermediates, products, solvents, cleaning agents, and waste.

Third Party Representatives shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment. Third Party Representatives shall strive to reduce their environmental impact through responsible resource use, waste reduction, sustainable manufacturing processes, and optimized logistics.

Environment

Third Party Representatives shall operate in an environmentally responsible manner and comply with all applicable environmental laws and regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained and complied with all associated operational and reporting obligations. Third Party Representatives shall establish and maintain appropriate processes and systems to:

- Ensure ongoing compliance with applicable environmental laws and regulatory requirements. Required environmental permits, licenses, information registrations and restrictions shall be obtained, and their operational and reporting requirements followed.
- Manage waste responsibly by enduring the safe handling, movement, storage, recycling, reuse, or disposal of waste. Any generation and disposal of waste, emissions to air and discharges to water, with the potential to adversely impact human health or the environment shall be appropriately minimized, properly managed, controlled and/or treated prior to release into the environment.
- Prevent, identify and mitigate accidental and diffusive spills and releases of hazardous substances to the environment through effective management controls and response measures.
- Promote the efficient and sustainable use of all relevant resources including energy, water and materials by implemented measures aimed at reducing environmental impact and improving resource efficiency.
- Foster a culture of environmental responsibility by actively considering opportunities to improve environmental performance across their operations. Third Party Representatives should seek to raise awareness among employees, encourage environmentally conscious behaviors, and support initiatives that contribute to long-term sustainability and reduced environmental impact.

Protection of the Health and Safety of Workers

Third Party Representatives are expected to provide safe and healthy working environment.

Third Party Representatives shall:

- Have programs and systems in place to provide workers with safety information relating to hazardous materials and education to protect them from potential hazards. Hazardous materials can include but are not limited to raw materials, isolated intermediates, products, solvents, cleaning agents, and waste.
- Have systems and programs in place to identify both occupational and process hazards. They should quantify such hazards and define the risk levels appropriately and have programs and systems in place to prevent or mitigate these risks (e.g. catastrophic releases of chemicals, fumes, dust).





- Have systems and processes in place to protect workers from exposure to chemical, biological and physical hazards (including physically demanding tasks) in the workplace.
- Develop and distribute emergency plans across their facilities. Third Party Representatives should minimize the potential impact of any emergency by implementing suitable emergency plans and response procedures.





Governance and Management System

- Third Party Representatives shall use management systems to facilitate continual improvement and compliance with the standards set forth in this Code.
- Elements of the management systems shall include the following:
 - Third Party Representatives shall demonstrate commitment to the concepts described in this Code by allocating appropriate resources and governance.
 - Third Party Representatives shall identify and comply with applicable laws, regulations, standards and relevant customer requirements.
 - Third Party Representatives shall have mechanisms to determine and manage risk in all areas addressed by this Code.
 - Third Party Representatives do not sub-contract or otherwise engage with third parties on behalf of Swixx or represent Swixx to third parties, without the prior written consent of Swixx.
 - Swixx may audit (or engage a third-party auditor to audit) the Third Party Representatives at any time upon reasonable prior notice, to ensure its compliance with the standards in this Code and to confirm all payments made by Swixx and to third parties. Supplemental audit provisions may also apply as agreed between the parties.
 - Third Party Representatives shall maintain documentation necessary to demonstrate conformance with these standards and compliance with applicable regulations, such as:
 - Prepare and maintain books and records that document accurately and in reasonable detail all matters related to the Third Party Representative's business with Swixx, accounting for all payments made on behalf of Swixx, or out of funds provided by Swixx.
 - "Off-the-books" accounts and false or deceptive entries in Third Party Representative's books and records are prohibited. All financial transactions must be documented, regularly reviewed and properly accounted for. A copy of this accounting should be available to Swixx upon request.
 - Ensure that all relevant internal financial controls and approval procedures are followed and that the retention and archive of books and records is consistent with the tax and other applicable laws and regulations as well as with Third Party Representative's own standards. More specific record retention requirements may be agreed between the parties.
- Third Party Representatives shall educate their employees to make ethical and sustainable decisions in compliance with laws, regulations and contract requirements. If required, Swixx has the right to train Third Party Representatives' employees working on behalf of Swixx.
- Third Party Representatives are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections and management reviews.



The standards and supporting policies and procedures contained in this document may change from time to time.

Swixx Third Party Representatives are responsible for knowing and complying with the current laws, regulation, standards, policies and procedures that govern our work.

The most current version of this document can be found on the Compliance homepage on Swixx website.