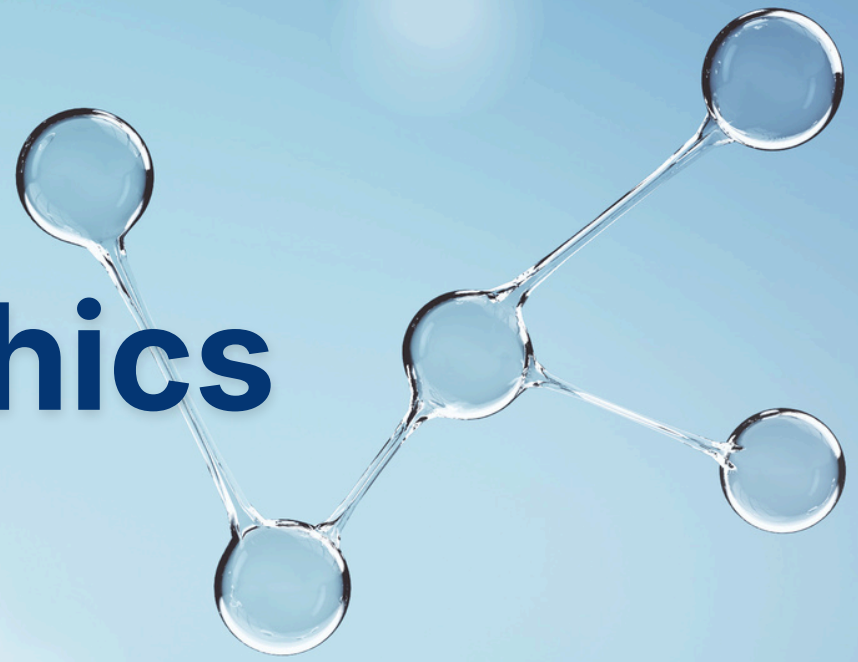
Code of Ethics

2026 edition



UNITED KINGDOM / EUROPE / CENTRAL ASIA / MIDDLE EAST

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A message from Amaxa

How we achieve results matters as much as the results themselves.



At Amaxa, how we achieve results matters as much as the results themselves. Our work affects patients, healthcare professionals, customers, colleagues, business partners and the communities in which we operate. We therefore act with integrity, use sound judgement and take responsibility for our decisions.

This Code sets the standards expected of everyone who works for or represents Amaxa. It applies across our operations in the United Kingdom, Europe, Eastern Europe, Central Asia and the Middle East, regardless of role, seniority, location or employment arrangement.

Our core principles



Integrity

We are honest, transparent and accountable.



Respect

We treat people fairly, protect dignity and value different perspectives.



Quality

We protect patients and customers through high standards, reliable products and responsible decisions.



Compliance

We follow applicable laws, regulations and professional standards.



Courage

We speak up, raise concerns early and never retaliate against those who do so in good faith.

01 Our workplace

Diversity equity and inclusion

We want everyone at Amaxa to be treated fairly, with dignity and respect. We value different backgrounds, experiences and perspectives, and we expect our people to recognise and challenge conscious and unconscious bias. Employment decisions are based on qualifications, performance, experience and legitimate business needs.

We have zero tolerance for bullying, harassment or unlawful discrimination. We communicate professionally, listen to different views and address disagreements constructively.

Privacy

We respect the privacy of employees and candidates. Personal information is collected, used, stored and shared only for legitimate purposes, in line with applicable data protection law and Amaxa policies.

Health safety and wellbeing

We provide a safe and healthy working environment and comply with applicable health and safety requirements. Everyone must follow safety procedures, report hazards promptly and never work while impaired in a way that could put themselves or others at risk.

Development and open communication

We support appropriate training and professional development. Employees are encouraged to ask questions, share ideas and raise concerns. Managers are expected to listen and respond fairly.

02 Our responsibilities as employees

Everyone working for or representing Amaxa must:

- perform their duties honestly, carefully and to the best of their ability;
- follow applicable laws, this Code and relevant company policies and procedures;
- complete required training and seek help when requirements are unclear;
- keep accurate records and never conceal, falsify or misrepresent information;
- protect company assets, systems, information and reputation;
- cooperate with authorised audits, reviews and investigations; and
- report actual or suspected misconduct promptly and in good faith.

Managers have an additional responsibility to lead by example, create an environment where people can speak openly, take concerns seriously and escalate them appropriately.



03 Responsible business practices

We integrate integrity, quality and accountability throughout the way we conduct business. These principles apply across the product lifecycle, from product selection and development through regulatory approval, manufacture, packaging, storage, distribution, promotion and ongoing safety monitoring.

Quality and good practice standards

We comply with the good practice standards relevant to our activities. Our quality systems are designed not only to meet legal and regulatory obligations, but also to support continuous improvement, effective risk management, scientific integrity and consistently reliable products and services.

Patient and customer safety

The safety, quality and integrity of our products and services come first. We follow applicable quality, pharmacovigilance, medical device vigilance, distribution and regulatory requirements. Potential safety issues, quality defects, complaints and adverse events must be reported immediately through the relevant Amaxa process, even when the information is incomplete.

04 Customers suppliers and business partners

We choose and work with customers, suppliers, distributors, agents, consultants and other partners fairly and on the basis of legitimate business considerations. Appropriate due diligence must be completed before engagement and, where required, during the relationship.

We expect business partners acting for or on behalf of Amaxa to meet standards consistent with this Code, including requirements relating to quality, anti-bribery, human rights, confidentiality, data protection, sanctions and fair competition.

Responsible sourcing

We aim to source products and services responsibly. Partner selection considers quality, capability, integrity, labour and human-rights practices, health and safety, environmental responsibility and compliance risk. Concerns identified during due diligence or the business relationship must be assessed and addressed appropriately.

We honour our contractual commitments, protect information entrusted to us and respond to concerns professionally.

05 Bribery gifts hospitality and financial crime

Zero tolerance for bribery

Amaxa does not tolerate bribery or corruption in any form. No one may offer, promise, give, request or accept anything of value to improperly influence a decision or obtain an unfair advantage. This prohibition applies in dealings with both private parties and public officials, and includes facilitation payments.

Financial crime sanctions and trade controls

We comply with applicable laws relating to money laundering, terrorist financing, fraud, tax evasion, sanctions, export controls and customs. Employees must follow screening and due diligence procedures and promptly report unusual payment requests, ownership structures, routes, counterparties or transactions.

Gifts hospitality and sponsorships

Gifts, meals, travel, hospitality, donations and sponsorships must be lawful, reasonable, infrequent, transparent and connected to a legitimate purpose. They must never be intended or reasonably perceived as an attempt to influence a decision. Required approvals and records must be completed in advance.



06 Conflicts of interest

A conflict of interest arises when personal interests, relationships or activities could interfere or appear to interfere with objective decisions made for Amaxa. A conflict is not necessarily misconduct, but failing to disclose and manage it may be.

Potential conflicts must be disclosed promptly to the employee's manager or the appropriate Amaxa contact. Employees must not take part in the relevant decision until the conflict has been reviewed and an appropriate course of action agreed.

Examples include:

1. holding a financial interest in, or working for, a competitor, customer or supplier;
2. directing business to a company owned or managed by a relative or close associate;
3. using an Amaxa opportunity, information, position or asset for personal benefit;
4. accepting gifts, payments, discounts or services that could affect independent judgement;
5. outside employment or business activity that competes with Amaxa or interferes with Amaxa duties; and
6. political activity that could be presented as being conducted on behalf of Amaxa without authorisation.

07 Fair competition and market conduct

We compete on the strength of our products, services and people. We do not enter into agreements or discussions with competitors concerning price fixing, market sharing, bid rigging, customer allocation or other anti-competitive conduct.

Competitive information must be obtained lawfully and ethically. We do not seek or use confidential information belonging to competitors, former employers or other third parties without proper authorisation.

08 Government and regulatory authorities

We engage with government bodies, regulators, customs authorities and other public institutions openly, respectfully and truthfully. Information provided on behalf of Amaxa must be accurate, complete and submitted by authorised persons within required timeframes.

We cooperate with lawful inspections, audits and requests. No one may obstruct an investigation, conceal or destroy relevant information, or make a false or misleading statement to an authority.



09 Information data and company assets

Confidential information

We protect non-public information belonging to Amaxa and to third parties, including commercial plans, prices, contracts, product information, intellectual property, regulatory data, employee information and customer or supplier records. Confidential information is shared only with authorised people who need it for legitimate work purposes. This duty continues after employment or engagement ends.

Information security and records

Employees must follow security controls, protect passwords and devices, recognise cyber threats and store records in approved systems. Records must be retained and disposed of in line with legal requirements and company procedures. Relevant material must never be deleted or altered when an audit, investigation, dispute or legal hold is anticipated or under way.

Personal data

We handle personal data lawfully, fairly and securely. We collect only what is needed, use it only for stated and legitimate purposes, retain it only as long as necessary and report suspected loss, misuse or unauthorised access immediately.

Company property and communications

Amaxa assets and systems are provided for legitimate business use. Limited personal use may be permitted where it is lawful, reasonable and does not interfere with work or security. Only authorised persons may speak publicly or communicate with the media on behalf of Amaxa.

10 Human rights and responsible operations

We respect internationally recognised human rights and do not tolerate forced labour, child labour, human trafficking or abusive working conditions in our operations or supply chain. We expect our business partners to uphold comparable standards.

We aim to use resources responsibly, reduce avoidable waste and consider the environmental and social impact of our decisions where relevant to our operations and products.



11 Speaking up and non retaliation

Everyone has a responsibility to raise concerns about conduct that may be unlawful, unethical, unsafe or inconsistent with this Code. Concerns should be raised as early as possible through one of the following channels:

- a line manager or another trusted manager;
- the relevant Human Resources, Legal, Compliance or senior management contact; or
- email: oec@amaxa-pharma.com.

Reports may be made confidentially and, where permitted by law and available through the relevant reporting channel, anonymously. Amaxa will handle concerns sensitively, share information only with those who need it and assess reports fairly and promptly.

Amaxa prohibits retaliation against anyone who raises a genuine concern, asks for advice or participates in an investigation in good faith. Deliberately making a false allegation is also inconsistent with this Code.



12 Compliance and accountability

This Code applies to all Amaxa directors, officers, employees, temporary workers, contractors and anyone authorised to act on Amaxa's behalf. Business partners may also be required to comply with relevant provisions through their contracts.

Breaches may result in corrective or disciplinary action, up to and including termination of employment or engagement, subject to applicable law. They may also expose individuals and Amaxa to civil or criminal liability.

No commercial objective, instruction from a manager or local custom justifies conduct that breaches the law or this Code. Where local law, professional rules or an Amaxa policy sets a higher standard, the higher standard must be followed. Where requirements conflict or are unclear, seek advice before acting.



13 Ownership and review

The Code is approved by Amaxa management and reviewed periodically to reflect changes in law, regulation, risk and business operations. Supporting policies and procedures provide more detailed requirements and must be followed together with this Code.

