



1Q Health

FAST TRACK
TO QUALITY

CODE OF CONDUCT

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FOREWORD BY THE CEO

Dear colleagues, valued business partners,
dear stakeholders,

Our new Code of Conduct is much more than just a document – it is a reflection of who we are, what we stand for and how we live up to our responsibilities. It describes our shared understanding of integrity, fairness and trust – values that unite us as 1Q Health and guide our daily work. I am proud that we are taking this important step together – as a team that takes on responsibility with passion and conviction.

Responsibility and integrity are deeply rooted in our corporate culture. Compliance with laws is a matter of course for us, but our standards go far beyond that: As a responsible and innovative company, we want to build and maintain trust – trust in our quality, in our actions and in us as people.

Our Code of Conduct is not merely a set of rules, but a commitment to our values and a compass that guides us. It stands for respect, fairness and sustainable action – towards colleagues, customers, partners and society. Because we are convinced that sustainable success can only be achieved when economic strength, ethical conduct and responsibility are in harmony.

As a CDMO in the healthcare sector, we bear a special responsibility. Our work touches people's lives – this fills us with pride and humility. That is why quality, safety, transparency and sustainability are our top priorities.

This Code of Conduct reflects our shared values and our ongoing development. It takes into account our changing times and the growing importance of ESG issues – environmental, social and good corporate governance. This enables us to create a strong foundation for sustainable growth and future viability – today and for generations to come.

I would like to thank all employees, managers, partners and investors who bring these values to life every day. Together, we ensure that our Code of Conduct remains a living expression of our culture – and a promise to all those who place their trust in us.

With warmest regards,



Philipp Ziehr

Chief Executive Officer
1Q Health GmbH



Philipp Ziehr

1. ETHICS AND INTEGRITY

We only pursue legitimate business objectives and practices and maintain relationships solely with reputable business partners. We act fairly and respectfully towards our partners and customers. We respect different legal, economic, social and cultural conditions, including the specific circumstances of the countries and regions in which we operate. Our actions are always based on generally accepted ethical values, in particular integrity and respect for human dignity. We support and promote free and fair global trade.

1.1 FAIR COMPETITION

We are committed to free and fair competition. We do not tolerate anticompetitive agreements (e.g. price fixing, division of customers and sales territories between competitors) and ensure that our company acts in accordance with applicable antitrust and competition laws. We reject any competitive advantage gained through unfair business practices. We will immediately put a stop to any violations.

1.2 COMBATING CORRUPTION; TRADE CONTROLS; MONEY LAUNDERING PREVENTION

We reject any form of bribery or corruption. We avoid even the slightest appearance of undue influence, whether through offering or accepting unjustified advantages. Gifts in the form of invitations or presents are permissible to the extent customary in the respective country if they are related to advertising measures or serve the purpose of promoting business relationships or presenting products or services.

Such gifts may only be accepted or granted if they serve a legitimate business purpose and do not constitute consideration for an unlawful advantage. The gift must not be of an unreasonably high value and must not exceed the limits of what is customary



in business or the normal standard of living of the recipient. When accepting or giving presents or invitations, internal regulations, in particular approval requirements, must be followed.

Donations and sponsorship activities are both generally permitted, but may not be used to unlawfully obtain business advantages. We refrain from any kind of concealment of payments that could give rise to corruption risks.

We comply with applicable import and export control regulations and fulfil our legal obligations to prevent money laundering.

1.3 DATA PROTECTION, CONFIDENTIALITY AND INTELLECTUAL PROPERTY

We respect the personal rights of our employees, business partners and customers. We comply with all applicable laws and regulations regarding the processing of personal data and information security.

When collecting, storing, processing or transferring personal data (e.g. name, address, telephone number, date of birth, information about health) of employees, customers or other third parties, we exercise the utmost care and strict confidentiality and comply with applicable laws and regulations. Likewise, data collection and storage is reduced to the necessary minimum. Employees who handle personal data receive advice, training and support from the data protection team.

We protect trade secrets and other confidential information entrusted to us by our partners and customers from unauthorised access, unauthorised use or unauthorised disclosure, in accordance with the legal provisions for the protection of trade secrets. We respect the intellectual property rights of our partners, customers and third parties. We take appropriate precautions to protect intellectual property when exchanging know-how and technologies.

1.4 CONSUMER PROTECTION

All products manufactured by us must comply with the applicable legal, safety-related and quality requirements. Our aim is to be a reliable partner for our customers, guaranteeing the highest quality and product safety, in line with all relevant regulations and customer specifications.

The safety of our products is directly linked to the safety of everyone involved in the supply chain. We therefore expect our partners to take measures to prevent product tampering, counterfeiting or deceit in order to protect the trust of our customers and ensure the integrity of our products.

We implement appropriate measures to ensure that our products and services comply with relevant consumer protection laws. As part of our marketing and sales activities, we adhere to fair business, advertising and consumer information standards.

1.5 FINANCIAL INTEGRITY

We ensure that our transactions and records are always accurate and in order. We record and document all business transactions, assets and liabilities in accordance with the financial reporting rules of the 1Q Health Group and legal requirements. We conduct all business processes with the utmost precision, thoroughness and sense of responsibility. We comply with all tax regulations and fulfil our tax obligations in accordance with the respective legislation.

1.6 IT SYSTEMS

We use our IT systems responsibly and securely, in accordance with applicable data protection and compliance requirements. We treat confidential information with the utmost care and use our systems exclusively for business purposes. We avoid any kind of manipulation or unauthorised software installation. Our entries in electronic systems are correct, complete and traceable. We actively monitor cyber risks and immediately report security incidents or irregularities to the relevant authorities.

2. ENVIRONMENTAL RESPONSIBILITY

The protection and conservation of natural resources is a shared responsibility. Accordingly, we conduct our business activities in an environmentally responsible manner and are committed to the goal of a climate-neutral future.

2.1 ENVIRONMENTAL AND CLIMATE PROTECTION

We take our environmental commitments seriously and comply with applicable legal requirements and internationally recognised standards. Our environmental measures focus on:

- Safe and responsible handling and disposal of hazardous substances, chemicals and waste
- Reduction or avoidance of waste generation
- Minimisation of emissions from business activities (e.g. wastewater, air emissions, noise, greenhouse gases)
- Conservation of natural resources through saving water, chemicals and raw materials and promoting the circular economy
- Use of environmentally friendly technologies, processes and materials
- Improving energy efficiency and increasing the proportion of renewable energy sources in our business operations

2.2 ANIMAL WELFARE AND BIODIVERSITY

We adhere to principles for the protection of animals and biodiversity. The use of animals must comply with legal animal welfare requirements and be appropriate to the species. The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) serves as our guideline in this regard.



3. HUMAN RIGHTS AND LABOUR STANDARDS

Human dignity is inviolable. We respect internationally recognised human rights in accordance with the Universal Declaration of Human Rights and the core labour standards of the International Labour Organisation (ILO). We endeavour not to cause or contribute to human rights violations – and expect the same from our partners. Where possible, we support our suppliers in these efforts.

3.1 EMPLOYMENT RELATIONSHIPS

We treat our employees with respect and reject any form of unlawful punishment, mistreatment, harassment or intimidation. We comply with applicable labour law regulations and provide our employees with clear information about their rights, working hours, remuneration and terms of employment. Employees retain the right to terminate their employment relationship in compliance with the statutory notice periods.

3.2 REJECTION OF FORCED LABOUR

We categorically reject any form of forced labour, including debt bondage, slavery, serfdom and human trafficking. All work must be freely chosen and performed in accordance with international labour standards.

3.3 REJECTION OF CHILD LABOUR AND PROTECTION OF YOUNG WORKERS

We do not tolerate child labour. We comply with the minimum age requirements of the respective country and never employ persons under the age of 15 or under the age at which compulsory schooling ends, whichever is higher. Our partners are obligated to properly verify the age of their employees. Where child labour is identified, any corrective measures must prioritise the welfare and development of the child. Young workers under the age of 18 may only be employed under conditions that do not jeopardise their health, safety and development.

3.4 WORKING HOURS

We comply with statutory or collectively agreed working time regulations, including provisions on overtime, rest periods and holidays. We ensure that:

- Regular working hours plus overtime do not exceed the statutory maximum limits
- Statutory rest and holiday entitlements are granted

3.5 REMUNERATION

We comply with statutory or applicable collective wage agreements. We ensure that:

- Wages are at least equal to the statutory or industry-specific minimum standards
- In regions without statutory wage specifications, the remuneration is sufficient to cover basic needs
- Pay deductions are legally compliant and never used as a punishment

3.6 OCCUPATIONAL HEALTH AND SAFETY

The health and safety of our employees is our top priority. We comply with national and international occupational health and safety laws to prevent accidents, injuries and illnesses.

- Emergency response plans must be in place to protect employees
- Employees must be trained in safety procedures
- Health risks must be identified, minimised and addressed through appropriate programmes
- Mental health must be promoted and psychosocial risks must be minimised

3.7 DIVERSITY, INCLUSION AND NON-DISCRIMINATION

We promote an inclusive working environment and ensure equal opportunities for all – regardless of origin, disability, gender, age, sexual orientation, beliefs or political opinions. We are committed to ensuring equal pay for work of equal value.

4. CORPORATE MANAGEMENT AND IMPLEMENTATION

We rely on robust structures and control systems to ensure compliance and accountability throughout our entire business operations.

4.1 RESPONSIBILITY & QTA

1Q Health manufactures on a contract basis. Unless otherwise agreed, responsibility for food information and claims lies with the food business operator under whose name the product is marketed (EU Food Information Regulation, Art. 8). 1Q Health provides the client with complete and accurate product-related information and does not make any changes that could be misleading. A Quality Technical Agreement (QTA) is mandatory and regulates specifications, change control, deviations/CAPA, approvals (HACCP/artwork/claims), audits, sub-contracting, samples/retention and data/IP protection.

4.2 RESPONSIBLE LEADERSHIP

We expect managers to understand and promote this Code and ensure that their teams comply with it. The principles of the UN Global Compact should form part of the corporate strategy.

4.3 DUE DILIGENCE OBLIGATIONS IN THE SUPPLY CHAIN

Partners must implement due diligence measures throughout their entire supply chain to identify and mitigate risks to people and the environment. This includes risk analyses and preventive measures.



4.4 COMPLAINTS MANAGEMENT

We believe that concerns about the behaviour of others can often be resolved through constructive dialogue. However, this is only possible if employees and partners can report their concerns or violations confidentially and without fear of reprisals. Employees who raise actual or suspected misconduct in good faith must not suffer any disadvantages as a result. We are therefore committed to effective complaints procedures that contribute to continuous improvement.

4.5 COMMUNICATION IN THE SUPPLY CHAIN

The values of this Code apply to the entire supply chain. Partners must ensure that their suppliers are aware of and comply with these standards.

Product safety & recall

"We guarantee traceability (1-up/1-down) and have a recall/withdrawal procedure in place. In the event of security risks, we will inform the client immediately and support official measures in accordance with Regulation (EC) 178/2002, Articles 18/19."

Food safety culture & training

"Managers promote a **food safety culture** within the meaning of **Regulation (EU) 2021/382**; mandatory annual training: hygiene/HACCP, claims law, antitrust law, anti-corruption, data protection."

4.6 CONTINUITY OF BUSINESS OPERATIONS

Partners must develop plans to maintain business continuity, particularly for processes that directly support our business. These plans ensure resilience in times of crisis.

4.7 DOCUMENTATION AND REPORTING

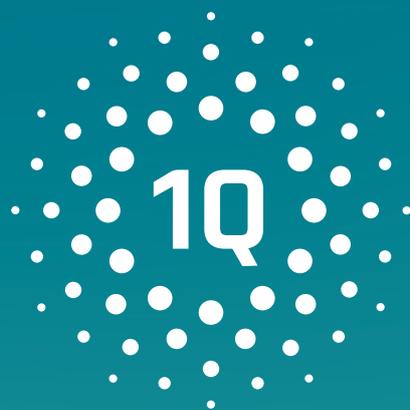
All measures relating to this Code shall be documented and reviewed regularly. Transparency enables us to track progress and address shortcomings.

4.8 AUDITS AND INSPECTIONS

Transparency is important to us. We reserve the right to conduct audits, inspections or reviews – on site or remotely – to verify compliance. These can be carried out internally or by third parties.

4.9 VIOLATIONS AND REMEDIAL MEASURES

Our managers and employees are obligated to report any violation of this Code immediately. Appropriate measures must be taken to end or mitigate the violation. Should these measures not be successful within a mutually agreed period, we reserve the right to suspend or terminate the cooperation. Our goal is always to solve problems constructively and in partnership.



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