

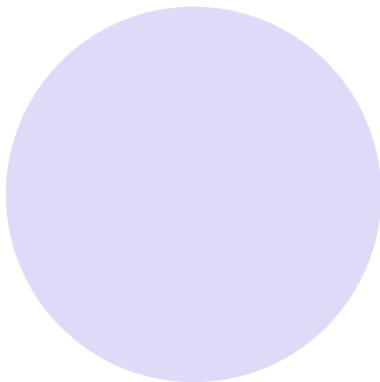
# CODE OF CONDUCT

for Business Partners



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# Foreword

The topic of corporate culture and value-oriented behaviour is particularly important to us in Croma management. Croma is aware of its function as a role model for ethically correct and professional behaviour and expects the same from its partner companies. We see it as our duty to provide products that drive progress in aesthetic medicine or lead to a significant improvement in the quality of life of people with eye diseases and orthopaedic complaints. Our partner companies are an integral part of this commitment to promoting individual wellbeing.

The standards contained in the Code of Conduct apply to all of Croma's business partners. This includes suppliers and subcontractors as well as all other providers of goods and services, regardless of their location.

We are proud of the long-standing and close relationships we have built up with our business partners. This catalogue of values forms the basis for continued successful cooperation and the promotion of sustainability throughout the entire value chain.

By committing to this Code of Conduct for Business Partners, our business partners ensure that all current and future transactions or agreements with Croma fulfil the guidelines and expectations contained herein.



CEO, Gerhard Prinz



CCO, Andreas Prinz



COO, Martin Prinz



CFO, Peter Haidenek

Leobendorf, 15th Decembre 2023

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## Introduction and application

This Code of Conduct for Business Partners is derived from our Code of Conduct for Employees and promotes compliance with the highest ethical standards when working with business partners. At the same time, it contributes to the achievement of our corporate goals. The minimum requirements and expectations contained therein are to be understood as guidelines that our business partners, such as suppliers and other service providers, should adhere to along their entire value and supply chain. They do not claim to cover every individual case conclusively or to answer every question that may arise. The Code of Conduct therefore does not relieve partner companies of the responsibility to make considered judgements, act ethically and exercise due diligence, especially with regard to their supply chains.

If local legislation is stricter than the standards formulated in the Code of Conduct, the former must be taken into account. The partner companies are free to decide how to fulfil the requirements. However, it is important to ensure that the methods used do not contradict this document or the respective country-specific code of values and culture. Croma reserves the right to terminate business relationships with companies if they violate guidelines and standards. Both the Code of Conduct for Employees and the Code of Conduct for Business Partners are available on the Croma website.

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## Fair operating and business practices

Croma's business partners have an obligation to conduct themselves ethically and with integrity in all business transactions and to comply with all applicable national, state and/or local laws, regulations and ordinances. This includes regulations related to business, labour, quality, safety and health practices as well as environmental and animal welfare. Business partners are also expected to comply with generally recognised industry standards and to have the necessary permits, registrations and licences. Possible non-compliant or unethical behaviour is to be prevented with proactive measures. We reserve the right to carry out random checks as part of audits.

### **Corruption and bribery**

Croma's partner companies are obliged to share our clear commitment against corruption and bribery in accordance with the applicable, country-specific anti-corruption laws. Any form of bribery or improper payment, whether directly or indirectly benefiting Croma, is prohibited. Bribes include, but are not limited to, cash or undeclared rebates, refunds, payments for advertising or other disguised discounts or expenses.

### **Gifts and business meals**

Companies that are already in a business relationship with Croma or are seeking such a relationship may not offer gifts, hospitality, gratuities or benefits that could influence the decision of Croma employees or representatives, public officials or professionals, whether on a

business, professional or private level. In the case of occasional gifts of low value it should be noted that they should be in line with generally accepted business practices and comply with local customs.

### **Conflict of interest**

Croma's business partners are expected to recognise potential conflicts of interest at an early stage and avoid situations that create even the appearance of a conflict. Accordingly, they should not have competing interests that could interfere with objective decisions in Croma's interest. In the event of an actual or potential conflict of interest, Croma must be informed immediately.

### **Fair competition**

The business relationship with Croma must be conducted in accordance with fair competition and applicable antitrust law. The partner companies are strictly prohibited from any misrepresentation of facts, concealment or misuse of information.

### **Money laundering and terrorist financing**

When conducting business activities, there is always a risk that such activities will be misused by third parties for money laundering or terrorist financing. For this reason, partner companies must demonstrably fulfil all legal requirements and their funds must come from legitimate sources. Companies in a business relationship with Croma should also subject every new business partner to a risk-based review. Especially if their

business activities are likely to have an impact on Croma.

### **Data protection and confidential information**

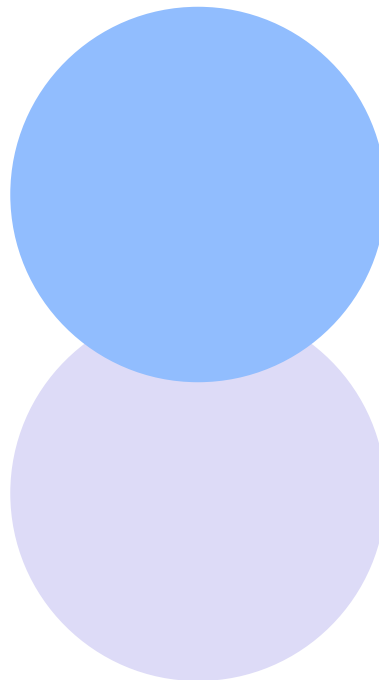
Croma expects its business partners to comply with applicable data protection and privacy laws and to ensure the proper use and security of personal and identifiable information (e.g. of employees, customers or patients).

Croma's confidential information must be protected. If an exchange is necessary, a non-disclosure agreement must be signed in advance. In the event of disclosure, it must be ensured that the use of said information is limited to the purpose for which the disclosure was intended. The

contractual partner must also have appropriate information security systems in place that comply with applicable laws and industry standards. Any unauthorised use must be reported immediately to the Compliance Officer.

### **Raising concerns**

In the event of concerns, questions or actual violations of this Code of Conduct or in connection with ethics and compliance that could have an impact on Croma, we have set up the anonymous platform <https://croma.integrityline.com>. Alternatively, it is also possible to get in touch with the relevant contact person directly. The reported incidents must be scrutinised in detail and, if necessary, appropriate corrective measures must be taken.



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# Working environment and human rights

Croma's business partners are committed to upholding the principles of the UN Human Rights Charter and must ensure that they are not complicit in human rights abuses. The principles contained in the Charter include the following points:

## **Payment of fair and competitive wages**

Employees must be paid on time and in accordance with applicable wage laws. This also includes minimum wages, overtime and other premium regulations in connection with binding collective agreements. The salary should enable employees to enjoy a decent standard of living.

## **Ensuring a fair and ethical working environment free from any form of forced or compulsory labour, child labour or human trafficking**

Employees must not be subjected to verbal or physical harassment or discrimination based on race, colour, religion, gender, national origin, age, disability, sexual orientation, gender identity or expression or any other legally protected basis. The use of psychological or physical coercion is strictly prohibited.

## **Compliance with local legal labour standards and social benefits**

Employees must be provided with labour standards that comply with applicable national and local laws and binding collective bargaining agreements, including those related to social protection. Binding regulations on working hours, break times and rest periods must be complied with.

Employees' applicable rights to compulsory insurance, paid annual leave, public holidays, sick leave and parental leave must be guaranteed.

## **Ensuring a safe and healthy working environment**

Employees must be provided with safe and healthy working conditions. These include properly equipped workplaces, health and safety equipment, access to drinking water, sanitary facilities and emergency plans, supplies and exits. Health and safety risks must be closely monitored and avoided. Appropriate guidelines are in place to prevent the carrying of weapons, misuse of alcohol and drugs or other controlled substances (all substances covered by the Narcotics Act) in the workplace.

## **Guarantee freedom of association as well as the right to collective bargaining and to join trade unions**

The right of employees to organise, join trade unions or elect employee representatives must be recognised unconditionally. Local labour legislation must be taken into account. Employees must be able to voice their concerns openly without fear of discrimination or other reprisals. In the event of serious negative impacts on human rights in its value chain, the partner company is obliged to contact Croma directly. This can be done directly via the respective contact person or alternatively via the platform <https://croma.integrityline.com>. Serious negative consequences for human rights are understood to be those where delayed action would mean that human rights violations cannot be reversed. This includes, for example, deaths, child labour or systematic harm to a large number of people or certain population groups.

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# Environment and society

Croma's business partners take their corporate responsibility seriously and organise their business activities not only according to economic, but also ecological and social principles. If potential deficiencies, weaknesses or risks are identified, they are expected to be dealt with and eliminated immediately.

## **Product quality and safety**

Products and services provided to us must comply with all legally prescribed safety and quality standards, and goods must be delivered on time. When co-operating with or on behalf of us, the Croma-specific quality requirements, including the minimum quality specifications, must be complied with. This applies not only to the core processes of the partner company, but also to its supply chain.

Croma must be notified immediately in the event of health inspections or other official matters as well as changes to materials, methods, specifications or production and delivery processes. Partner companies have a duty to ensure the integrity of their supply

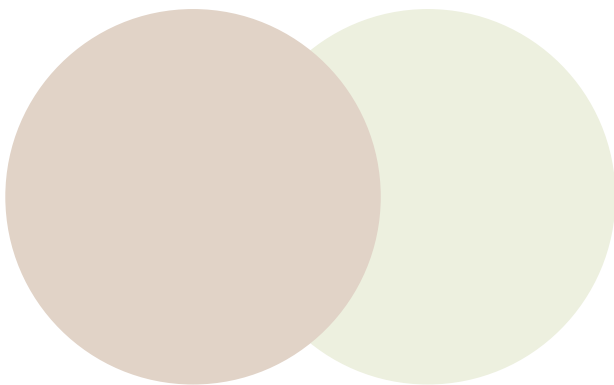
chain to protect patients and prevent counterfeiting or falsification in accordance with the EU Falsified Medicines Directive. Companies in a business relationship with Croma that are involved in the production and distribution of Croma medicines and products must ensure compliance with GxP guidelines for the markets in which the products are manufactured, registered and distributed.

## **Environmental protection**

When working with Croma, business partners must comply with all environmentally relevant approvals, licences, permits, operational and reporting requirements, as well as regulations relating to the use of restricted substances.

They are obliged to work efficiently and in an environmentally conscious manner and to minimise or eliminate environmental pollution. They are required to conserve natural resources and contribute to sustainability measures such as reuse or recycling.

Where possible, the use of hazardous substances should be avoided and the use of alternative, natural substances should be favoured instead. Partner companies are obliged to pursue a sustainable procurement policy. To protect the local population, appropriate systems must be in place to ensure the safe handling of air emissions, waste and wastewater, including their transport, reuse and storage. Appropriate emergency plans must be in place for unintentional releases. In environmental management, special attention must be paid to the topics of resources, climate, energy and water. The corresponding catalogue of measures should take into account the following



points, among others:

- Reduction of GHG emissions, waste generation and energy and water consumption
- Promotion of measures that obtain or generate energy from renewable sources
- Promoting the use of renewable resources
- Avoiding waste and promoting recycling

### **Animal welfare**

Ensuring the humane and ethical treatment of animals is a high priority for Croma. Partner companies are therefore encouraged to use animal-free testing methods that are scientifically sound and recognised by the relevant regulatory authorities whenever possible. If country-specific legal requirements or industry-specific regulations stipulate mandatory animal testing, business partners are called upon to reduce this whenever possible and to continuously minimise the stress on laboratory animals.

of commitment and accountability, legal and customer-specific requirements, risk management, documentation, training and competence, continuous improvement and communication.

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## Management systems

Croma expects its partner companies to continuously improve with the help of management systems. The requirements of this Code of Conduct are taken into account through the definition of performance targets and the implementation of catalogues of measures. If deficiencies are identified in the course of audits, internal and external ratings or management reviews, these must be corrected immediately and appropriate preventive measures implemented. Business partners are called upon to orientate themselves on the international quality management system ISO 9001, which covers the areas



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