

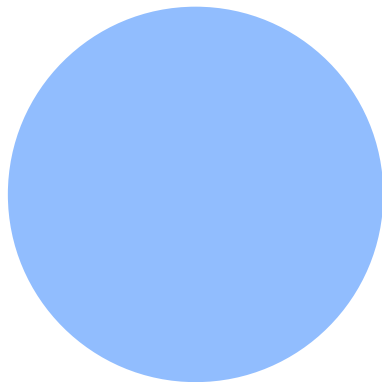
CODE OF CONDUCT

for Employees



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Foreword

The topic of corporate culture and value-oriented behaviour is particularly important to us in Croma management. Our shared catalogue of values provides every employee with a framework for action and orientation for working together.

With the Code of Conduct, we are strengthening our corporate culture with an additional guideline for action and making a clear commitment to upholding the principles of the Universal Declaration of Human Rights. The Code of Conduct is a summary of rules of behaviour that sets out the framework for responsible, correct and ethical conduct for the entire workforce. In it, we want to draw attention to applicable laws, company and international standards as well as legal risks and

non-compliance which could damage the company's reputation or business success.

All Croma employees are obliged to be familiar with the content of the Code of Conduct and to consciously align their actions with it. In this way, all Croma employees make an important contribution to strengthening the company and protecting it from potential risks.



CEO, Gerhard Prinz



COO, Martin Prinz

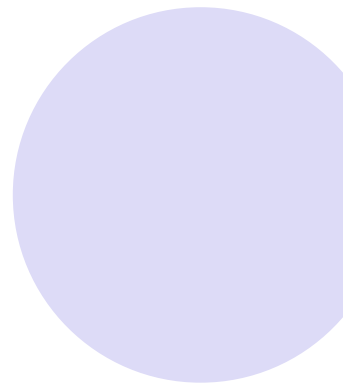


CCO, Andreas Prinz



CFO, Peter Haidenek

Leobendorf, 15th December 2023



Introduction and application

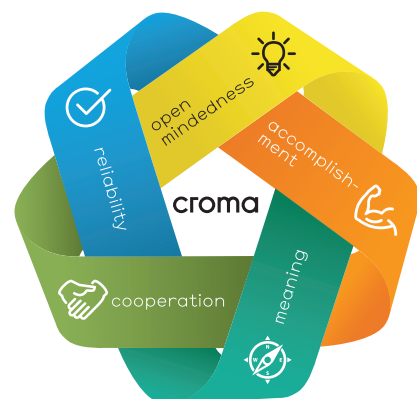
This Code of Conduct forms the basis for all business actions and decisions of Croma-Pharma GmbH and its majority-owned subsidiaries („Croma“). It is the basis for morally, ethically and legally impeccable behaviour by all Croma employees.

This Code of Conduct is binding for all Croma employees. New employees must undertake to comply with the Code of Conduct in their employment contract. All employees receive an electronic version of this Code of Conduct. In addition, this Code of Conduct is available on the Croma intranet and on the company’s website. Each employee is responsible for complying with and implementing the Code of Conduct. Croma’s managers act as role models in implementing the contents of the Code of Conduct. They also instruct their employees on how to deal with the Code of Conduct, monitor compliance with it and provide support where necessary. No employee can or will be penalised for complying with the Code of Conduct. This Code of Conduct describes the basic principles according to which Croma ensures the lawful and ethically correct behaviour of its employees, but cannot conclusively cover every individual case or answer every question that may arise. The Code of Conduct therefore does not relieve every employee of the personal responsibility to make independent and considered judgements and actions. If there is any uncertainty as to how the Code of Conduct should be interpreted in individual cases, or if other questions arise on the subject of compliance,

the relevant contact points should be consulted.

In the event of a breach of statutory provisions, internal guidelines, regulations and instructions or of the provisions of this Code of Conduct, disciplinary consequences must be expected. In addition, violations may also result in criminal and civil law consequences, such as recourse claims and claims for damages, for the person concerned. Compliance with this Code of Conduct is regularly monitored by the Legal Department and the Compliance Officer. Croma’s core values are set out in the following statements:

- **Cooperation:** Appreciation, openness, fairness
- **Reliability:** Quality, structure, commitment
- **Open Mindedness:** Curiosity, personal development, willingness to change
- **Meaning:** Sustainability, foresight, joy
- **Accomplishment:** Result and solution-orientation, personal responsibility, performance



Our commitment to fair operating and business practices

Croma complies with all applicable laws at all times. To do this, it is necessary to know in detail the legal requirements that are relevant to our daily work. These requirements vary from country to country. All employees are required to obtain comprehensive information about

the laws, other regulations and internal guidelines and rules applicable to their respective area of responsibility and to contact the legal department in cases of doubt.

Violations of the law or this Code of Conduct can have serious consequences for Croma or individual employees.

These include, for example:

- Disciplinary measures
- Fines
- Prison sentences

Croma itself may face:

- Damage to reputation
- Large fines
- Withdrawal of product approvals or trade licences
- Exclusion from certain markets or countries

If you are unsure about the right behaviour, ask yourself the following questions:

- Is my behaviour lawful?
- Is it in line with Croma's objectives, values and principles?
- Does it comply with the Code of Conduct?
- Could it have a negative impact on Croma for myself?

- Would I act in the same way in the presence of a manager or colleagues?
- Would I feel comfortable if it was published in the media?

If even one of these questions cannot be answered with a clear "yes", the behaviour must not be engaged in.

Corruption and bribery

Croma does not tolerate any form of corruption or bribery. Fraudulent or other dishonest behaviour by employees is strictly prohibited. Corruption is the abuse of delegated power or decision-making authority with the intention of gaining an undue advantage. Corruption is a phenomenon that affects all areas of society and has devastating consequences on a social, political and economic level. Bribery is the demand, acceptance or promise of an advantage (for oneself or a third party) in exchange for the performance or omission of an act contrary to one's duty. Bribery is a criminal offence punishable worldwide. All employees are strictly prohibited from directly or indirectly offering or accepting advantages if this could improperly influence business transactions or even create such an impression. Advantages are, for example, gifts, invitations or shopping opportunities at conditions that are not customary for third parties. The only exceptions to this are gifts of low value (e.g. pens, T-shirts or a small gift basket in connection with approaching public holidays) and hospitality within the scope of customary business practices, whereby the amount may not exceed EUR 110 per person. All other gifts or invitations must be refused or returned and the manager must be informed. Offering or accepting money or favours of monetary value is not permitted. Country-

specific laws and customs must always be observed.

Gifts and business meals

Gifts of low value or invitations to a joint business meal for the purpose of establishing a cordial relationship with customers are generally permissible. However, particular attention must be paid to ensuring that the gift in question is appropriate to the occasion and that the acceptance or giving of such a gift does not impair or could impair the independence of the business partner or employee or give the impression to third parties that inappropriate influence is being exerted. In such cases, it is imperative that the gift is not accepted or given.

Even the mere appearance of an inappropriate gift or invitation can cause lasting damage to Croma's reputation.

Under no circumstances may employees

- Accept gifts or invitations given by customers or suppliers in exchange for performing or refraining from performing a certain action.
- Demand gifts or invitations from customers or suppliers.
- Accept gifts of more than nominal value

An inappropriate gift or invitation must be politely declined with reference to compliance with this Code of Conduct. If the refusal of a gift could cause personal offence to the giver, the gift may be accepted as an exception, provided that the Compliance Officer has been informed in writing in advance and the gift is subsequently distributed by the Compliance Officer (e.g. through an employee raffle).

Conflict of interest

A conflict of interest exists when personal interests conflict or may conflict with the interests of Croma employees.

Such a conflict of interest may result in decisions being made that are contrary to Croma's interests, customers being deterred or confidential information being leaked.

In particular, persons entrusted with the selection of a service provider or supplier should pay increased attention to the existence of a possible conflict of interest. The internal purchasing guidelines must therefore always be strictly adhered to.

Example:

Not awarding a contract to the best bidder due to a close personal relationship.

The following questions can help you recognise a conflict of interest:

- Is the decision I make in favour of Croma influenced by my personal interests?
- What impression would my decision make if customers and business partners knew about it?
- How would the public react to my decision?

Possible conflicts of interest must be reported immediately by the person concerned to the manager before a possible assignment of the third party. This serves to protect the reputation and integrity of the employee and Croma.

Political influence and lobbying activities

Croma and its subsidiaries do not make donations to political candidates or parties, nor do they engage in lobbying activities. However, Croma respects the right of its employees to engage in political activities and to support political groups or candidates. However, these activities must be carried out in the employee's own time, in their own name and with their own resources or funds and under no circumstances at the expense of the company. It must be clearly recognisable that the employee is acting independently and not on behalf of Croma.

Antitrust and fair competition laws

Antitrust and competition laws prevent dishonest business practices, ensure fair competition and protect the interests of customers, producers and society as a whole. Croma adheres strictly to the relevant laws and has a duty to treat its external stakeholders, such as customers, suppliers, competitors, etc., appropriately. All employees, especially those in areas such as purchasing, sales and marketing or otherwise in contact with competitors, have a responsibility to ensure that they are familiar with applicable antitrust and competition laws. Any violation of these principles can have serious consequences for Croma and every employee. These include heavy fines, exclusion from certain markets, loss of product approvals, claims for damages, reputational damage and even prison sentences.

Fair competition is one of Croma's fundamental principles. Croma competes intensively and always uses fair and authorised means.

Examples of breaches of competition law include price fixing or the unauthorised division of customers, markets or territories. It is also illegal to exploit a dominant market position (more than 30 - 50% market share).

Never communicate with competitors about:

- Prices, composition of prices or other conditions of sale
- Markets, customers or sales territories
- Business opportunities or incoming orders

Capacities, capacity utilisation or production volumes

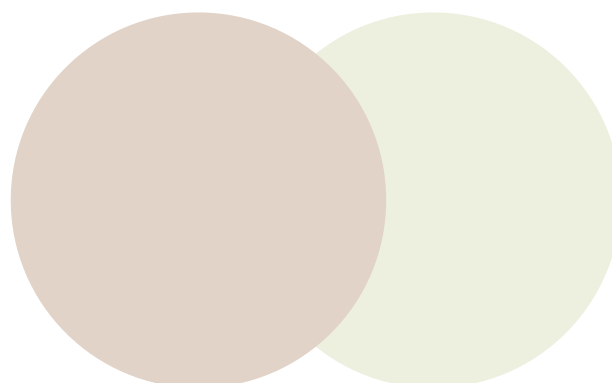
- Sales or general strategies, future products, planned investments

Under no circumstances may employees of Croma:

- Make agreements with competitors that violate fair competition.
- Impose binding sales prices on customers. Non-binding price recommendations or the agreement of maximum prices, on the other hand, are usually permissible.

Import and export control laws

For a globally active company like Croma, compliance with all applicable regulations, laws, sanctions and restrictions relating to the import and export of its products and services is a top priority. Especially in countries affected by economic sanctions, business activities must be subject to regular monitoring. Before entering into a business relationship with a new business partner, it must be checked that there is no entry in national or international ban lists. Before exporting goods, it must be ensured that the item in question is not subject to any restrictions and that no export/re-export licence is required from the authorities. Some destinations are subject to extensive foreign trade restrictions, such as embargoes or sanctions, and require additional checks prior to any further action. Croma strictly adheres to government-imposed trade sanctions on imports and exports applicable to its activities.



If there are any doubts or questions, the legal department or the Compliance Officer will provide support.

Integrity in business transactions

Croma does business in many countries and documents its activities accurately and truthfully in accordance with legal requirements. An internal control system is used to record financial data in a timely and complete manner in order to ensure the integrity of work processes. Expenditure and sales are documented for the specified accounting period in accordance with the applicable accounting standards and internal guidelines with the aim of preventing incorrect or inappropriate entries. Documents and records must be accurate and complete so that they can be stored and managed securely in accordance with the electronic Quality Management System (eQMS). If certain documents are subject to a legal retention period, employees must ensure that the records remain intact.

The quality of the documentation, which is regulated in the Quality Manual, is of great importance:

- Handwritten entries may only be made by the person who carried out the work step themselves. This person must confirm the personal execution of the work step with a fully authorised signature.
- No person may sign on behalf of another person. Signatures are to be regarded as binding, i.e. the person who signs is responsible for what has been signed.
- Passwords must always be kept secret. Passing them on to other people or using other people's passwords is strictly prohibited.
- Pre- or backdating is also not permitted.
- Croma Quality documents and records

may not be destroyed before the prescribed archiving period.

Money laundering and terrorist financing

When conducting business activities, there is always a risk that such activities may be misused by third parties for money laundering or terrorist financing. Croma therefore only maintains business relationships with those customers, partners and companies that demonstrably fulfil all legal requirements and whose funds come from legitimate sources.

Money laundering means the covert introduction of illegally acquired assets into the legal economic cycle, particularly in the area of drugs and organised crime. The value is to be preserved, but at the same time removed from the reach of law enforcement authorities.

Before entering into a business relationship with a new partner, the partner must be subjected to a risk-based review:

- Does the business partner even exist (entry in the commercial register)?
- In which country is the business partner based?
- What is the business background of the business partner - what other activities does the business partner carry out?
- What is the business partner's shareholding structure?

Suspicious activities of the business partner may include

- Request for cash payment
- Request for payment of an invoice in many different instalments without an objectively comprehensible reason
- Payment of an invoice not by the business partner but by an unknown third party
- Proposing and accepting unusual terms and conditions, e.g. resale of goods below the purchase price

In the event of such suspicious activities, the Compliance Officer must be informed immediately.

Business relationship with third parties

Croma works with consultants and service providers as well as suppliers and healthcare providers in a large number of countries. These co-operations are based on the Croma Code of Conduct for Business Partners, compliance with which is demanded from the partner companies. This ensures a business relationship characterised by fairness and mutual trust. If, for example, consultants or service providers use the remuneration received from Croma to obtain contracts through bribery, Croma can - under certain conditions - be held liable for the behaviour of these third parties. To avoid this situation, service providers must be carefully selected and thoroughly scrutinised before contracts are awarded.

Transparency International, an NGO based in Berlin, publishes the "Corruption Perceptions Index" (CPI) every year, in which all countries in the world are listed according to how corruption is perceived in the respective country: <https://www.transparency.org>. The resulting CPI value can be between 0 (highly corrupt) and 100 (absolutely not corrupt). If a consultant or service provider is required in a country with a CPI value below 30, special checks must be carried out before the contract is awarded to ensure that the consultant or service provider complies with the requirements of this Code of Conduct. If this is not the case, the contract cannot

be awarded to this consultant or service provider.

Travelling expenses

In certain cases, Croma will reimburse the travelling expenses of third parties. The reimbursement of travel expenses may also inappropriately influence the recipient or at least give the appearance of doing so. Therefore, only those travelling expenses that are contractually agreed and reasonable shall be reimbursed.

Payments

Croma makes payments to third parties on a daily basis. Predefined processes ensure that all payments are properly documented. In general, payments are only made if the entire process is correctly documented and the dual control principle is adhered to. The following cases should always be scrutinised critically:

- Contradiction between invoice addressee and payer
- Very high prices with unusually large discounts or conspicuously low profit margins
- Suspicious close personal relationships
- Objections to anti-corruption clauses in contracts
- Requests for advance payment without plausible justification
- Requesting cash payments or payments to off-shore accounts or from third-party accounts

Data protection

The protection of natural persons with regard to the processing of personal

data is a fundamental right that every EU member state must value. The central legal bases for Croma are the EU General Data Protection Regulation (GDPR) and the Data Protection Act (DPA). Personal data of natural persons residing within the EU is protected. Personal means that the information can be used to identify the person (e.g. name, address, telephone number, email account). There is also data that is particularly worthy of protection, so-called special category data, often referred to as sensitive data. This includes data on racial and ethnic origin, political opinions, religious or ideological beliefs, trade union membership, sex life, sexual orientation or health data. These may only be processed under very strict conditions. In the following, personal and sensitive data are collectively referred to as “data”.

As the controller, Croma is subject to various obligations when processing data. Data may only ever be processed for specific purposes and in accordance with predefined processes. To ensure this, separate data processing directories (“DDPs”) have been created that show which data is processed, how it is to be handled and, in particular, to whom it may be transmitted - internally and externally. If there is no longer a purpose for the processing, data must be deleted.

Every Croma employee shares personal responsibility for data protection and is obliged to fulfil this obligation,

- to be familiar with the DPA of their department and to process data only in accordance with these guidelines,
- to immediately report any deviation from the DPA - whether accidental or due to fault - and all other data protection incidents to the Data Protection Officer, and
- promptly forward requests for information

from data subjects to the data protection officer.

Particular care must be taken when transferring data across borders, including between the individual Croma companies. In general, all employees are obliged to check possible legal restrictions before transferring data and, in case of doubt, to consult the Data Protection Officer.

The General Data Protection Regulation provides for fines of up to 20 million euros for data protection violations or up to four per cent of annual global turnover for companies (whichever is higher in the end). If an employee incurs a fine, Croma can demand compensation from the employee in addition to imposing disciplinary consequences.

Our commitment to a positive working environment

Croma's strengths also include its highly qualified, motivated and diverse workforce. All employees must therefore treat each other with dignity and respect at all times. Croma is committed to attracting, motivating and retaining an inclusive and diverse workforce.

Respectful and fair working conditions

Croma consciously embraces diverse ideas and perspectives to drive innovation and goal achievement. By creating discrimination-free, harassment-free and inclusive workplaces that respect personal rights and privacy, Croma enables employees to realise their full potential and promotes social justice and team cohesion. As part of this commitment, Croma does not tolerate discrimination on the basis of race, colour, religion, gender, national origin, age, disability, sexual orientation, gender identity or expression, or any other basis protected by law. Unwanted or inappropriate behaviour such as verbal or physical harassment or intimidation will not be tolerated. All employees have the right to be treated with respect, equality and courtesy. Further information can be found in the anti-bullying guidelines, for example. Croma encourages employees who return from family leave and presents itself as a family-friendly company where it is easy to reconcile the desire to have children with a career.

Health and safety

The safety and health of employees, co-operation partners and visitors on site are an integral part of the company's activities. Croma ensures a safe and healthy workplace and takes measures to minimise injuries and illnesses. Employees are obliged to comply with the applicable occupational health and safety regulations and to contact the relevant authorities in the event of emergencies in the workplace or undesirable behaviour. Accidents, near misses and unsafe and dangerous conditions must be reported to the relevant health and safety officer so that they can be recorded. Drug, alcohol or narcotic abuse is contrary to Croma's commitment to a healthy and safe work environment and will not be tolerated. It not only has a negative impact on the health of the individual concerned, but also affects the safety of others and work performance. Croma is committed to continuously reducing potential hazards in the workplace and ensuring the health of its employees with numerous measures, such as training, work instructions and regular inspections.

Protection of company property

Employees are responsible for protecting Croma's assets from careless or improper handling, destruction or disclosure. This obligation applies to both tangible and intangible assets, including know-how, trademarks, proprietary or confidential information. Laptops, mobile devices, IT-specific software and hardware, vehicles, machinery and equipment may only be used for appropriate purposes and must be protected against loss, damage, theft and misuse. Unauthorised access in connection with information

technologies must be prevented by means of complex passwords that are difficult to guess and must not be disclosed. In addition to protected trademarks, other IP rights such as patents, copyrights and confidential know-how are essential to Croma's global success. However, if our innovations are not adequately protected, third parties can imitate our products and the time and money invested in research and development is lost.

Confidential information is any information that Croma does not make publicly available, such as any information related to:

- Employees
- Inventions
- Contracts
- Strategies and business plans
- Internal developments
- New products
- Regulatory data
- Domain names
- Company acquisitions
- Technical specifications of the products
- Prices of the products
- Financial data
- Manufacturing costs

Confidential information must be kept secret at all times, even outside of the workplace or working hours. The obligation to maintain confidentiality continues to apply without restriction even after termination of the employment relationship. We can guarantee the protection of our IP through the following measures:

- Prompt registration of all IP rights (patents, trademarks, etc.) with the assistance of the legal department
- Notification of all suspected or actual infringements of our IP rights
- Use of computer software only within the scope of the licence purchased

- Recognition and non-infringement of third party IP.

Under no circumstances:

- Disclose confidential information to anyone outside of Croma. This includes family members and friends. If confidential information must be disclosed due to business interests, it may only be disclosed under a Confidentiality Agreement (CDA) approved by the Legal Department.
- Even within Croma, confidential information should only be disclosed to those who have an objective business need to know.

Use of social media

Croma recognises the right of employees to use social media. This includes all digital communication channels that offer the opportunity to create and share content and publish comments. Employees should draw a clear line between private and business communication. They should demonstrate ethical behaviour and good judgement when using social media and not forget that they are communicating in a public space and that their behaviour can influence other people's opinions about Croma.

When communicating about the company or its products and services, or showing pictures or videos of people, employees are expected to take the same approach.

Use of artificial intelligence

Croma respects the right of employees to use artificial intelligence. However, data security has top priority. Under no circumstances may users enter sensitive company data (see section Protection of company property). If non-sensitive data is used, it must be anonymised, as the

information is stored by Chat GPT, for example, with the aim of improving and training the AI. This means that the data security of the information fed in cannot be guaranteed.

Our commitment to environment and society

As a family-owned company, Croma pursues a corporate policy that is orientated towards ecological, economic and social sustainability. In addition, Croma presents itself to the outside world as a multicultural and diverse company and demonstrates social commitment. When communicating with the public, attention is paid to the appropriateness, consistency and accuracy of content.

Croma acts responsibly and honestly. Employees take their responsibilities seriously, are reliable and only make promises that they can keep. If potential shortcomings, weaknesses or risks are identified, these are addressed immediately in order to find a solution. Croma and its employees do everything in their power to fulfil the trust that business partners and users of its products place in us.

Product quality and patient

Croma makes no compromises when it comes to product quality and patient safety. After all, the well-being of the people who use our products is at the centre of our activities. Employees must take particular care to ensure

that the information provided to healthcare providers is complete, accurate, up-to-date and relevant. This clear communication is in the interest of patients and supports product development processes. If costs are prioritised in the product development process, we compromise quality and our ability to deliver. If we prioritise our ability to deliver, we compromise quality and increase costs. But if we prioritise quality, we improve our ability to deliver and reduce costs at the same time. Focusing on quality is therefore a decisive competitive advantage, which we can expand even further with a modern, CGMP-compliant production facility that is subject to the strictest quality assurance procedures.

The top priority is to achieve the best results and offer innovative and safe solutions for patients. In research and development activities, the safety and health as well as the rights of study participants are guaranteed. The collection and detailed examination of information on product-related side effects is part of day-to-day business and employees are obliged to pass this on to the relevant authorities if they become aware of any such information.

Responsibility in communication, advertising and sales

All marketing material - advertising, literature and public statements about products and services - must be accurate, not misleading and give a balanced picture of risks and benefits. The material must always be supported by relevant facts (e.g. clinical studies) and must not contain false or misleading information.

Croma and its employees are prohibited

from advertising products or having them advertised prior to authorisation or for a use that has not been approved by the competent authorities (off-label use).

Commitment to human rights

Croma supports the principles of the UN Human Rights Charter and respects the rights and personal dignity of every human being. It complies with country-

specific labour laws, is committed to ensuring that human rights are respected in its business activities and assumes responsibility for ensuring that these do not contribute directly or indirectly to human rights violations. The company demonstrates responsibility and adheres to the following

internationally recognised ethical standards in the countries in which it operates:

- Payment of fair and competitive wages
- Ensuring fair and ethical working conditions free from any form of forced or compulsory labour, child labour or human trafficking
- Compliance with local legal labour standards and social benefits
- Ensuring a safe and healthy working environment
- Ensuring freedom of association, the right to collective bargaining and to join trade unions
- Non-discrimination in recruitment, contracting, wages, promotions, working conditions and other labour-related matters, subject to compliance with country-specific laws.

Contributing to the protection of the planet

As a responsible company, Croma strives

to minimise its environmental impact from the procurement of raw materials to the production and distribution of its products. Employees ensure that the company's own processes, products and services are designed to avoid environmental pollution and that legal requirements and internal regulations are complied with. This includes, for example, the notification, authorisation and registration of chemical ingredients used in production and in products.

Croma strives to continuously improve its environmental performance wherever possible and economically viable and has installed an environmental management system in this context. The areas of resource, energy and water management are particularly relevant. Employees are obliged to make their contribution by practising sustainable working practices.

This includes, among other things:

- Reducing GHG emissions, waste generation and energy/water consumption
- Promoting the use of renewable resources
- Promotion of measures that obtain or generate energy from renewable sources
- Reducing the environmental impact of business activities
- Minimising environmental risks
- Avoiding waste and promoting recycling
- Compliance with all environmental and animal welfare laws and internal guidelines

The humane treatment of animals is a high priority for Croma. If country-specific legal requirements or industry-specific regulations in connection with research and development work and registration stipulate mandatory animal testing, we endeavour to reduce this whenever possible and to continuously minimise the stress on laboratory animals. When working with external laboratories, we favour those that are accredited by the Association

for Assessment and Accreditation of Laboratory Animal Care International (AAALAC). Croma is committed to seeking alternatives to animal testing whenever and wherever possible.

Social commitment

Croma is committed to supporting communities locally and globally through legitimate charitable donations and initiatives to promote public health and education. This includes scholarships, donations, grants and all other charitable contributions. Employees must strictly ensure that the support does not result in a business advantage for Croma and is carried out in accordance with the company's own authorisation procedure, including accounting. One initiative from the Croma social programme is aimed at treating eye diseases in underserved areas. As a manufacturer of hyaluronic acid injections for the ophthalmology sector, the company has been supporting the international aid organisation "Light for the World" for many years. With generous product donations, Croma makes an important contribution to ophthalmological care in the poorest regions of the world and helps those affected to regain their sight. By means of a short operation, sight is restored so that these people are once again able to lead a self-determined life and actively participate in society.

Our procedure in the event of violations

What should be done if signs of possible misconduct are discovered?

It is the duty of every employee to report violations of this Code of Conduct in order to establish compliant behaviour and protect Croma from risks and damage. This applies even if the employee is not directly affected by the violation. Reports can be made to the following bodies:

- Management
- Human Resources Department
- Legal department
- Compliance Officer

In addition or as an alternative, an anonymous report can be sent to <https://croma.integrityline.com>. In many cases, damage can be averted or the extent of damage reduced by reporting an offence in good time.

Each anonymous report should contain as many details and facts about the possible incident as possible. After receiving a report, the Compliance Officer will check it for plausibility and consistency. If applicable, an internal investigation of the incident will be initiated and, if necessary, the state authorities will be informed. If possible with regard to confidentiality and data protection, the reporting party will be informed of the outcome of the investigation once it has been completed.

The Compliance Officer records all breaches of this Code of Conduct and cases of fraud and reports annually to the company's management and Supervisory Board.

Reporting a violation will in no case have any consequences or disadvantages for the person involved. However, in the event of demonstrably unfounded allegations being made for personal reasons, Croma reserves the right to take disciplinary action against the reporter.

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Croma-Pharma GmbH
Industriezeile 6, A-2100 Leobendorf, Austria
tel: +43 2262 684 68 - 0
fax: +43 2262 684 - 165
e-mail: office@croma.at
web: www.croma.at

FN / companies register: 92329d
FB-Gericht / company register court: Landesgericht Korneuburg
Firmensitz / registered seat: Industriezeile 6, 2100 Leobendorf, Austria