



Code of Business Ethics

A Strong Compliance Culture is Vital for Our Business Success

MESSAGE FROM OUR CEO: Juniper Biologics Cares about Compliance and It is a Strong Part of our Culture.



Juniper Biologics is committed to being a compliant organisation, dedicated to upholding the highest standards of corporate governance. We strive to go beyond industry standards, and to continually raise the bar. To provide our innovative treatments to those who need our medicines, we must strive to create and maintain a corporate culture that puts patients first. We are continuously looking for ways to improve our compliance and governance, while continuing to focus on patient wellbeing and care. As a result, we are committed to remaining a leader in our field, setting the bar for others to follow.

The Juniper Biologics Code of Business Ethics is designed to help us maintain the highest compliance standards. This compliance culture applies to everyone at every level, in all our markets and across all functions across the region. All of us who represent Juniper Biologics in any position or capacity must be personally committed to follow the letter and the spirit of this Code.

All of us at Juniper Biologics should understand and recognize our individual and collective responsibility for embedding a strong compliance culture into our processes, procedures, and business operations. This is not about inhibiting business and competitive advantage but to give us a common language of compliance across the organisation. Alongside this, Juniper Biologic's ESG impact goal is to contribute to the improvement and quality of life to patients by providing more effective and efficient treatment options. In addition, Juniper Biologic wants to increase access to essential and affordable medicines. This ESG goal cannot be achieved without a strong compliance culture.

We are a dynamic, patient-centric organisation. While we are constantly changing and driving to provide innovative solutions for our patients, our drive for success must always be grounded in commitment to lawful and ethical conduct. It is, and must be, the way we work.



Raman Singh

Chief Executive Officer

Juniper Biologics

Our Code of Business Ethics reflects our values regarding honest and ethical conduct. The Code is a framework for our teams to help us do the right thing and conduct our business in line with laws, regulations as well as ethics.

It is our policy to comply with both the substance and the spirit of all local laws, rules, regulations, and applicable industry codes. We expect all our personnel to always conduct business against the backdrop of this Code and with the highest ethical standards.

UPHOLDING THE CODE

Employee Responsibilities

As employees of Juniper Biologics, everyone shares the following responsibilities:

- To comply with all of Juniper Biologics's policies and procedures, including internal investigations, as well as local laws and regulations.
- To read and abide by the Code of Conduct, and to integrate the principles it sets forth in your personal conduct and in the way you conduct business on Juniper Biologics's behalf.
- You have the right and a responsibility to seek guidance if you are in doubt about a business decision.
- You have an obligation to report what you consider to be violations or possible violations of the Code of Conduct, Juniper Biologics's policies and procedures, as well as laws and regulations, as soon as possible. This includes existing processes and practices that violate any of the foregoing.
- To attend and actively participate in ethics and compliance training and initiatives.

Additional Responsibilities for Managers

If you are a manager, you have additional responsibilities that go beyond the basic requirements of all employees:

- Lead by example always and uphold the highest version of the principles set forth in the Code of Conduct, promoting them whenever possible.
- Provide support and guidance on integrating the Code of Conduct into the daily work of those who report to you.
- Encourage your direct reports to raise questions and concerns and create a culture of openness and trust. Support and protect individuals who, in good faith, report concerns or violations. Any such case must be handled with the highest degree of integrity and professionalism. You too have the right and responsibility to seek guidance on how to deal with such reports if necessary.
- Never take or allow retaliatory action against anyone who reports concerns.
- Monitor compliance with the Code of Conduct and ensure that your direct reports complete all required training.

Juniper Biologics's Responsibilities

As a corporate entity, Juniper Biologics has a responsibility to:

- Set the highest standards of integrity for its operations.
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- Provide all employees with the training and tools necessary to address any ethics or compliance issues they may face in their work.
- Ensure any reports of violations are treated confidentially and responsibly, and that the reviews of any reports are independent, impartial and conducted professionally.
- Ensure that no-one faces retaliation for reporting issues
- Continually strive to improve our corporate governance.

GENERAL PRINCIPLES

1. We put PATIENTS first.

- We consider our patients' wellbeing as a key driver of strategy. and we are focused on improving the lives of the people who need our medicines the most.
- We provide clear, accurate and current product information to Healthcare Professionals (HCPS) to support their patients with the best treatments.
- We ensure that all our communications are appropriate, capable of substantiation and reflect the available evidence, and that all other activities are similarly executed, reasonable and of the highest standard.
- We are committed to ensuring that the promotion of medicines to health professionals and other relevant decision makers is conducted using written approvals to support high quality patient care.
- We provide effective medical education and sponsorship to HCPs in conformity with local Healthcare guidelines and our own internal policies.
- Your duty is to ensure that you understand our approval framework and comply with it.

2. OUR PEOPLE AND WORKPLACE

An Inclusive and Responsible Workplace

Diversity in our workforce helps us to attract and retain our valued employees, which is crucial to Juniper Biologics's success. We are firmly committed to promoting a diverse, inclusive, and productive working environment that is defined by mutual respect. To do so, everyone is expected, always, to display respectful behaviour towards his or her colleagues and their ideas, as well as to our Business Partners. You must also be sensitive to and respectful of cultural differences.

You have the right and a responsibility to obtain guidance on these issues if you need to; your first point of contact should always be your line manager.

Equal Opportunities

Juniper Biologics, is committed to creating an equal opportunity workplace, where hiring and development are based on the achievements, qualifications, and skills of each individual. We do not allow negative discrimination where an individual or a group of individuals are considered less eligible based on including their national origin, union membership, race, religion, age, gender (including pregnancy), sexual orientation, gender identity, marital status, mental or physical disability, etc.

Our Employees are key to our success and are the foundation of our operations. We will not tolerate discrimination or harassment. Our working environment ensures we are free to do our job without fear of discrimination, harassment or bullying and each of our co-workers is entitled to expect the same. We must not engage in behaviour that is discriminatory or threatens, offends, undermines or insults other employees.

It is mandatory to comply with this Code. Please complete your training and don't hesitate to ask if you have any questions. Please note that your Employment Contract and the terms and conditions should also be consulted.

ANTI-BRIBERY AND CORRUPTION:

The key principle is that personnel may not offer, ask for, provide or accept anything of inappropriate value either for themselves or for others in return for favourable treatment. Bribery may come in many forms; therefore, a violation may include anything of value. While the most obvious form of bribery is the direct exchange of cash, it may also come by various means:

- Travel, flights, hospitality without appropriate Company approvals.
- Any gifts or items of value like tickets to events
- A pattern/recurrence of many "smaller" gifts or gifts to family members
- Payment for personal bills and fees unrelated to business
- Contributions to organizations or charities favoured by government officials.
- Purchasing items related to HCP's organizations including books authored by HCPs.

Personnel acting on our behalf must never offer, give, solicit, or receive any financial advantage and/or other advantages to retain business or secure an improper advantage. All transactions must be recorded accurately, completely and in a timely manner. This includes all transactions with external entities as well as internal transactions such as employment records. Making false or misleading entries or records is a breach of this policy.

Please note that the local laws prevail in each country to the extent they are more prescriptive than our Code of Business Ethics.

- We will not tolerate the payment, offer to pay, or authorisation or receipt of any bribe or any other unlawful or improper payment or giving anything of value to or from any public official, HCP, or private person on behalf of the Company.
- An employee or a business partner should never offer, give, solicit or receive any financial advantage and/or other advantage in order to retain business or secure an improper advantage.
- Any facilitation payment, even if small, to government officials to obtain or expedite routine government services where a fast track is not available.
- Giving gimmicks or low-cost tokens may be lawful in one country and unlawful elsewhere. You always need to have your manager's approval.
Nothing labelled with any product name may be given as a promotional aid or otherwise.

- Make sure your documentation of events and expense claims are correct.
- The accurate and complete records of activities and interactions with HCPs, Government Officials, other decision makers and HCOs must be properly documented in compliance with applicable laws and regulations and our SOPS.

BUSINESS STRATEGY

Our business strategy and operations are performed in accordance with the laws, strict anticorruption principles and in a professional, ethical, and transparent manner.

We always use best practices to support the provision of high-quality healthcare and work with partners who have the same values and practices.

We are a good global corporate citizen. We are committed to fair competition in the marketplace and fair marketing practices.

We cooperate with our relevant regulators and government agencies in connection with investigations, requests for information and site visits.

PROMOTIONAL ACTIVITIES

Key Principles of Promotional Activity:

- all promotional activity must be conducted in an honest, fair, and transparent manner.

All promotional claims must be:

- reliable, accurate, truthful informative, balanced, up-to-date, capable of substantiation and in good taste; and

- not contain misleading or unverifiable statements or omissions.
- Material relating to pharmaceutical products and their uses, whether promotional in nature or not, which is sponsored by a company, should clearly indicate by whom it has been sponsored.
- Pharmaceutical products may only be promoted for use in a specific country when the requisite approval for marketing for such use has been granted in that country; and consistent with the approved indications set out in approved marketing authorizations.
- our websites and any company sponsored websites must:
 - o only provide general information for the public. Any promotional content must be separated and only provided to healthcare professionals with the sections for each target audience clearly separated; and
 - o have the intended audience identified.
- Reprints of articles in journals must not be provided proactively.
- Telephone, text messages, email, faxes, automated calling systems and other digital communications must not be used for promotional purposes, except with the prior permission of the recipient.
- All promotional matters must be reviewed and approved in line with company's policies and procedures.

INTERACTIONS WITH HCPs, GOs, OTHER DECISION MAKERS AND HCOs

Interactions should be focused on informing or educating the HCPs, GOs, other decision makers and HCOs about medicines, providing scientific and educational information and supporting medical research and education. All interactions with HCPs, GOs, other decision makers and HCOs may create conflict of interest and unfair treatment. Therefore, Juniper Biologics, and the third parties who act on our behalf, may only engage in activities and interactions where there is a legitimate business purpose for the activity or interaction and the activity or payment is made at approved Fair Market Value.

Collaborative working between the pharmaceutical industry, HCPs, GOs, other decision makers and HCOs must be conducted in an open and transparent manner and must either enhance patient care or be for the benefit of patients.

Interactions with HCPs and GOs, other decision makers and HCOs are strictly monitored by the Compliance.. Personnel must refer to their local policies and standard operating procedures for guidance and obtain pre-approval before any interactions.

INTERACTIONS WITH THE PUBLIC

Key Principles:

Relationships with the Public (including patient and journalists)

- Prescription only medicines must not be advertised to the public and pictures of product logos should not be posted on social media or any other forum accessible to the public.
- Permissible information about prescription only medicines which is made available to the public either directly or indirectly must be factual and presented in a balanced way and approved by our Head of Medical
- Any material which relates to a prescription only medicine, and which is intended for patients taking that medicine must include the statement below or a similar one:

‘Reporting of side effects: If you experience any side effects, talk to your doctor, pharmacist or nurse’.

- Requests from individual members of the public for advice on personal medical matters must be redirected to our Medical Director and no discussion should be undertaken.
- Communication to public must be performed by authorized individuals only and all the speaking material must be approved by the communication department. Requests to speak at conferences etc must be approved in writing by the Head of Communications.

Relationships with Patient Organisations

We must:

- respect the independence of patient organizations.
- not promote or request the promotion of a particular prescription only medicine.
- ensure the objectives and scope are transparent and support provided by Our is always clearly acknowledged.

We may not be the sole funder of a patient organization or any of its programs. If financial support (e.g., donation/grant/sponsorship) or any in-kind contribution is provided by us to any patient organization, prior written approval must be granted. All such approvals should be stored safely.

CORPORATE SOCIAL RESPONSIBILITY AND ESG

Our corporate social responsibility, or CSR, is a business's accountability and commitment to contributing to the well-being of communities and society through various environmental and social measures, such as.

- Juniper Biologic's Environment Social Governance (ESG) impact goal is to contribute to the improvement and quality of life to patients by providing more effective and efficient treatment options as well as to increase access to essential and affordable medicines.
- We comply with all local human rights laws for all countries in which it does business. We prohibit the use of forced and child labour.
- As part of our commitment to identify and prioritise suppliers, we are committed to performing due diligence activities, especially in supply chain and human resources areas.
- We are committed to conducting its operations and managing its business in a manner that is protective of environmental, health and safety concerns of our employees, customers, patients, and the public. We act responsibly to protect and preserve a healthy and safe workplace for everyone.
- It is essential that personnel who deal with chemical substances, hazardous substances, or hazardous wastes in the course of our business comply with all applicable environmental, health and safety laws and regulations.
- All personnel as well as intermediaries and contractors' employees must share the responsibility of reporting any safety, quality or performance issues concerning our products, no matter if they will be reported through calls, letters, emails, websites, or through the media.

CONFLICT OF INTEREST

- Juniper Biologics directors and employees must avoid any situation that creates or appears to create a conflict between their personal interests and that of our business. In some cases where it is impossible to avoid such situation, then you are required to declare the same to the Head of Human Resources who will advise if it is permissible to proceed. Note that where the conflict provides you with any material financial advantage you shall not be permitted to proceed.
- You must not engage in any activities, which could conflict with our business interests, adversely affect our reputation or interfere with the fulfilment of the responsibilities of your job. You must not use your position with us, or Company's information or assets, for your personal gain or for improper benefit of others. You shall not seek employment for any family member or close relation.
- Personnel must consider all circumstances that may create an actual or apparent conflict of interest and are required to safeguard against situations that may impair their objectivity to take a business decision in the best interest of our business. Such conflicts of interest may derive from external commitments and personal relationships, such as family or other close personal relationships, or can be caused by the acceptance of inappropriate gifts and invitations.

- All potential conflict of interest should be reported in writing to the Head of Human Resources.

CONFIDENTIAL & PROPRIETARY INFORMATION

- We respect each individual's right to privacy, and we handle personal information only as permitted by law. Many countries have privacy or have personal data protection laws that must be followed.
- If you have access to personal data, you must handle the data in accordance with our data policy and local laws and regulations. See our Head of IT for further information.
- We protect intellectual property and confidential information that belongs to us and others. Personnel must not disclose any Company information, intellectual property, or documents without proper authorization. Similarly, we are also responsible for protecting confidential information of customers, suppliers and other business partners and personnel must not give or make available any such sensitive or confidential information to any third party without proper authorization under confidentiality agreements.
- We take cybersecurity issues seriously and work proactively to protect our employees and data from threats.

VII. Use of Company Computers, Resources and Social Media

- Unless otherwise specified, the internet, email and other applications are provided for business purposes. When accessing the internet or any social media, all personnel must respect and protect our reputation and business information by not posting any comments or documents about us or any of its customers or business partners that is confidential in nature, including on any social media sites such as social network sites, blogs, wikis, or other bookmarking sites. You should also use your personal social channels responsibly and ensure that comments, views and likes or all subject matters are carefully considered so that they do not bring disrepute to the Company.
- The use of our electronic information and communication equipment for illegal or unethical purposes is prohibited. Looking up, downloading, uploading, or forwarding of information with a racist, pornographic or violent content is considered to be serious misconduct. As permitted by applicable laws, we may monitor the use of our IT systems, property and communications including on devices, to address specific needs.
- Before you post anything online about Juniper or our products or any events where you take a photo with the team, your post must be approved by our Head of Medical and thereafter our Head of Communications to ensure we are compliant. Please also respect the privacy of

your colleagues and do not post photos or videos at company events or from the office. You may never post photos of HCPs without permission.

ASSET PROTECTION

Company assets may be used only for advancing our business purposes and goals, and should be safeguarded and protected against loss, damage, misuse, and theft. Assets include, amongst others, office facilities, furniture, equipment and supplies, information systems and other technology assets, i.e. organisational charts, business cards, processes, manufacturing methods as well as advertisements, business development plans and studies.

COMPETITION AND ANTITRUST LAWS

Anti-competition laws generally prohibit Company personnel from directly or indirectly engaging in discussions, making agreements, or coordinating activities with actual or potential competitors; abusing a dominant position in a particular market; entering into agreements with suppliers, distributors or retailers that limit or eliminate free and fair competition, or engaging in any other behaviour that would otherwise limit competition in breach of applicable laws and regulations.

We are committed to fair competition and free markets within the bounds of the law. This means:

- We never talk with or exchange information with competitors or others to:
 - Fix prices - this can include setting minimum prices, or “stabilizing” prizes.
 - Fix terms related to price, pricing formulas, credit terms, promotions, discounts, allowances, etc.
 - Divide up markets, customers or territories.
 - Place output restrictions or limits on production.
 - Rig a competitive bidding process, including arrangements to submit sham bids; - Boycott a supplier, customer or distributor or others in the marketplace.
- Personnel should avoid creating even the appearance of an improper agreement or understanding by keeping communications with our competitors to a minimum.
- There should always be a legitimate business reason for all communications with competitors.

Complying with antitrust and competition law also means that you should:

1. Not attempt to monopolize or dominate markets except through superior products, service or performance.
2. Seek legal advice before selling “below cost” (including below importation or production cost, which in certain circumstances can be illegal “predatory” pricing).
3. Seek legal advice before charging different prices to customers or intermediaries who compete.

We support joining industry gatherings and association meetings. Nevertheless, they pose certain risks as they bring competitors together who might discuss topics of mutual concern. Statements can be easily misinterpreted and misreported. In such a case, the Legal & Compliance Department needs to be informed immediately. Please note that violations of the antitrust laws are often treated as criminal acts that can result in felony convictions of both corporations and individuals.

INQUIRIES (MEDIA & PUBLIC)

If you are contacted by representatives of the media, please refer them to the Communications Department without delay. Never give an interview or answer to any media inquiries without authorisation.

GOVERNMENT INVESTIGATIONS

We will fully cooperate with all government authorities in connection with investigations, requests for information or site visits. It is important that the Legal & Compliance Department is notified of all non-routine government requests as it will support the respective business functions in determining the best course of action and which information shall be provided to the respective government authority. Please review our Dawn Raid Policy for further guidance.

TRAINING & COMPLIANCE ASSURANCE

Training is important to understand our compliance program. Starting with the on-boarding compliance training for new hires, this training covers the general principles of our Code of Business Ethics, Anti-Bribery and Corruption law.

As part of their duties, Managers are responsible for promoting compliance and preventing violations. Country Managers or General Managers are expected to take ownership of this Code of Business Ethics and to impart such ownership to personnel in their respective markets.

Please note that under our internal audit, the finance/compliance team may periodically perform reviews and monitor promotional and educational activities/ expenses and other activities.

SPEAK UP

Juniper Biologics encourages all personnel to speak up when they see any potential violation of the law or the Code of Business Ethics or for any concern.

How can personnel submit reports?

You can talk to:

1. your manager.
2. Human Resources department; or
3. Legal and Compliance department.

We also have a reporting channel, which is dedicated to embracing our transparency and speak up culture. Anonymous reports can be submitted directly to the Head of Legal and Compliance or via this channel : whistleblowing@juniperbiologics.com.

We promptly investigate all reported potential violations with the highest degree of confidentiality possible under the circumstances. If it is determined that a violation has occurred, we may institute disciplinary actions.

We do not tolerate retaliation against personnel in relation to reporting misconduct. We respect colleagues who report potential incidents.

EMPLOYEE CERTIFICATION STATEMENT

Make sure you read and understand this Code as all employees will be required to confirm annually that they have received, read, and will abide by this Code of Business Ethics.

By doing so, they also certify that they are not currently aware of any violations of law or policy within the meaning of this Code of Business Ethics, and that they undertake to promptly report any such suspected or actual violations in the future.

Annexure 1

DEFINITION

- a. Healthcare Professionals or HCPs include any member of the medical, dental, pharmacist or nursing professions. Also included is any other person who, in the course of their professional activities, may prescribe, recommend, purchase, supply, sell or administer any medicines, patient care or handle patient needs.
- b. Government Officials or GOs refer to individuals who act on behalf of the State or perform a government/public function, whether on a full-time or part-time basis, and whether on a paid or unpaid basis. This includes:
 - any elected or appointed government official (e.g., Ministers of Health or heads of government agencies).
 - any person acting for a public enterprise (e.g., doctors employed in public hospitals, professors at public universities).
 - any person acting on behalf of a political party or candidate for public office; and
 - any person acting for a public international organization such as the World Health Organization, International Red Cross, Red Crescent or World Bank.
- c. Healthcare Organisations or HCOs typically refer to organisations that conduct a healthcare function or mission, and typically involve HCPs for example clinics and organisations that conduct healthcare research.
- d. Other decision makers refer to other individual or organisation, which could influence in any way the prescription, purchase, or administration of any medicine, or grant or award business to Our Biologics.
- e. Public refers to members of the public community, including patients, journalists and groups with common interests or characteristics such as patient organisations.
- f. Promotion refers to all informational and persuasive activities by employees, manufacturers and distributors, the effect of which is to induce the prescription, supply, purchase and/or use of medicine.
- g. Bribe or Bribery: Giving or Receiving of anything of value that is intended or could be seen as an inducement or reward for improper behaviour (i.e., behaviour that is dishonest or illegal or a breach of duty of impartiality, trust or good faith). Improper

influence of any official act or decision, or to obtain or retain business, favourable treatment or other advantage or benefit.

- h. Corruption: the misuse or abuse of a public or private office or power for personal gain. This includes but is not limited to facilitation payments, kickbacks, falsification of records.
- i. Fair Market Value (FMV): refers to the amount that a service or item would be worth to a typical buyer who is under no duty to purchase and who receives no special advantage.
- j. Intellectual property is a term used to describe copyrights, trademarks, patents, and trade secrets. A “trade secret” is any information or plan that gives its owner a competitive advantage because it is unknown to the rest of the industry.

Annexure 2

EMPLOYEE CERTIFICATION STATEMENT

Code of Business Ethics
Certification Statement

Employee Statement

I hereby confirm that I have received the Code of Ethics and have read and understood its contents.

I also certify that I am not currently aware of any violations of law or policy within the meaning of this Code of Business Ethics, and that I undertake to promptly report any such suspected or actual violation of law or policy in the future.

Employee Name:

Training date: