

# Code of Conduct

**Ensuring ethical business conduct  
at the highest standards**

Vimian Group AB (publ) and its subsidiaries  
("Vimian")



**vimian™**

Document name	Code of Conduct (“the Code”)
Policy holder	Chief Executive Officer
Other interest holders	General Counsel, Chief People Officer, Sustainability Director
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1	2022-11	Prepared by General Counsel and Sustainability Director Approved by CEO and Board	Code created with input from stakeholders, company values and international standards.
2	2024-09	Prepared by General Counsel and Sustainability Director Approved by CEO and Board	Updated to reference to added policies and reflect regulatory changes.



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# Introduction to the Code (1/2)

The Code is based on the ten principles provided by the the United Nations (UN) Global Compact. For further details please refer to Appendix I.

## Purpose

Vimian Group AB (publ) and its subsidiaries ("Vimian") are committed to high standards of ethical business conduct. In line with this commitment, we have adopted this code of conduct ("the Code") to ensure all Vimian employees, managers, the Board, contractors and applicable business partners ("Vimians") are provided with operating guidelines of what good business ethics looks like and are aware of what is expected of them.

## Scope

All Vimians have a personal responsibility to "live the Code" by incorporating it into their work, as well as encouraging other Vimian colleagues to do the same, therefore all Vimians are required to:

- read and understand the Code.
- take part of annual mandatory ethics trainings that cover the content of the Code.

## Implementation

To embed the high standards of business ethics Vimian ensures that the Code:

- is approved by the Board
- is informed by relevant internal and/or external expertise
- specifies Vimian's business ethics expectations of employees, business partners and other parties directly linked to our operations, products or services.
- is communicated and publicly available on Vimians website to all employees, business partners and other relevant parties.
- is implemented across the group through annual mandatory trainings.



# Introduction to the Code (2/2)

## Incident investigation and corrective action

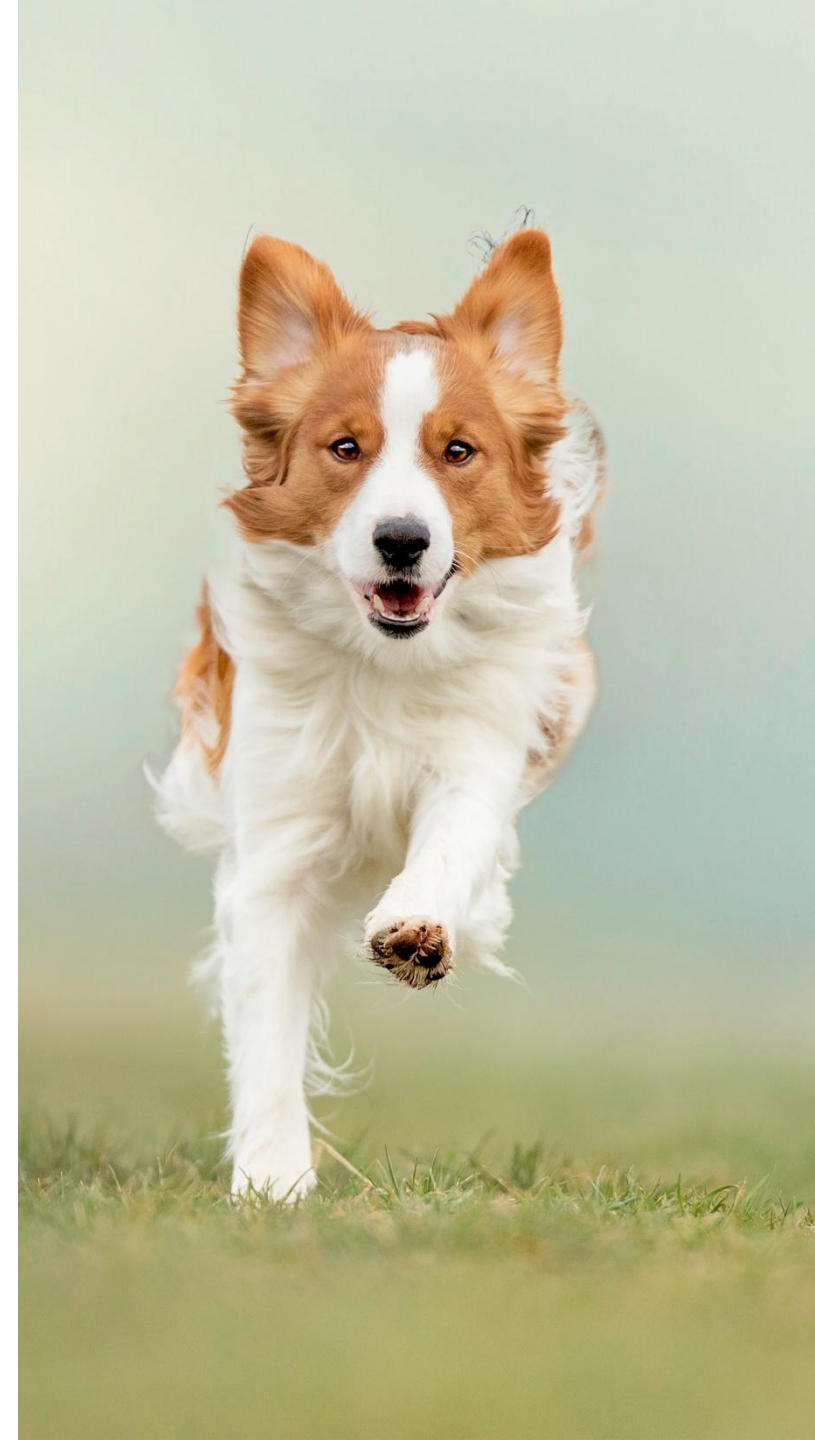
- Any incident reported follows the same investigation and corrective action procedure as whistleblowing, see [Whistleblowing policy](#).

## Ethical risk assessment

- Vimian is committed to conduct ethical risk assessments, address major business ethics risks and embed business conduct in the annual Enterprise Risk Management process which involves the Executive Management team and is approved by the Board.

## Legal and compliance

Vimian complies with local laws and regulations of each country in which we operate. This Code sets up a minimum requirement. If provisions laws, regulations or rules, be it local, national or international, have a more stringent position to the matters mentioned in this Code, those shall be observed and complied with. In situations where neither the law nor the Code gives guidance, the UN Global Compact principles shall prevail. In cases of conflict between this Code and a mandatory local regulation, the regulation shall prevail.



## Know and follow the code

As an employee or contractor, you need to be familiar with the information contained in this Code, our Vimian Group policies, as well as other policies and procedures that may apply to your segment, function or role.

- / A Vimian failing to follow the Code can result in disciplinary action, including termination of employment.
- / A contractor failing to follow the Code can result in termination of its relationship with Vimian.





## Speak up (incl. whistleblowing)

If you have a question or ever think that one of your fellow Vimians or the company as a whole may be failing to follow the Code, any internal policies or the law, do not be silent. We want to hear from you.

/ **Questions or concerns:** If you have a concern or question regarding the Code or any internal policies then raise it with:

/ The reporting manager or Human Resource representative

/ Legal, [legal@vimian.com](mailto:legal@vimian.com)

/ **Wrongdoing:** If you believe a violation of law or the Code has occurred, or any category of wrongdoing then promptly raise your concern with:

/ Your reporting manager or Human Resource representative

/ Legal, [legal@vimian.com](mailto:legal@vimian.com)

/ Through the Vimian's whistleblowing channel



# Non-retaliation

When raising any concerns related to violation of the Code, policies or the law you shall feel comfortable that you will not be subject to any form of retaliation.

## / **Retaliation is prohibited**

Vimian prohibits retaliation against any colleague of ours who reports or participates in an investigation of a possible violation of our Code, policies, or the law. If you believe you are being retaliated against, please submit a report in Vimian's [whistleblowing](#) channel or contact [Legal](#). Protection against retaliation does not apply if it can be established that a criminal offence has been made when gathering the information for the report or if the report itself constitutes a criminal offence.





# Act with ethics and integrity

As a Vimian always act in a professional and ethical manner knowing that your behavior reflects back on the group.

## / **Lead by example**

You are always a representative of Vimian - Lead by example and be a role model for ethical behavior.

## / **Protect non-retaliation**

As a leader within Vimian, do your part to ensure that no one who speaks up suffers retaliation.



# Be supportive and inclusive

Vimian welcomes you for who you are and encourages you to be your true self.

## / Foster a supportive environment at work

Vimians are expected to do their best to support a work environment where openness, integrity and honesty are valued, where everyone feels comfortable to ask questions and report potential concerns or violations.

## / Encourage freedom of association

Freedom of association is to be effectively enjoyed (e.g., the right to collective bargaining, ethnic or social origin, gender, disability)

Learn more about Diversity, Equity, Inclusion and Belonging (DEI&B) in [the DEI&B policy](#).





# Do not discriminate, harass or bully

Vimian strives to have a positive and creative atmosphere at work.

**/ Make everyone feel included**

Our workplace environment should be free from fear of discrimination or harassment. Do not discriminate, harass or bully in any form– verbal, physical, or visual.

**/ Speak up**

If you believe you or a colleague has been bullied, harassed, or discriminated against by anyone at Vimian, or by a Vimian partner or vendor, we strongly encourage you to immediately report the incident (see the section “Speak up”).





# Protect confidential information

Vimian values its confidential information. Do not disclose confidential information of Vimian or its partners, employees and other stakeholders to any third party unless you are authorized to do so.

## / Properly label

Properly label confidential information to specify how it should be handled, distributed and potentially destroyed.

## / Store and share in a safe manner

Ensure confidential information does not reach unauthorized individuals. Be very and mindful when you provide confidential data to anyone inside or outside Vimian. If applicable, ensure that confidentiality undertakings are in place before disclosing the confidential information.

## / Protect confidential information from partners and competitors

Just as you are careful not to disclose confidential Vimian information, it's also important not to disclose any confidential information from our partners. Further, we compete fairly with respect for our competitors. We do not want their confidential information or any confidential information belonging to any of Vimian's former employers. Never take advantage of a competitor's or former employer's confidential information.

## / Keep it to yourself, even at home

Some of us will find ourselves having family or other personal relationships with people employed by our competitors or business partners. Be mindful, don't tell your significant other or family members anything confidential, do not share passwords, and do not seek confidential information from them about their company.

Examples of **confidential information** are information about potential acquisitions, divestitures and investments, business plans, sales and profit figures, trade secrets, pricing, new product or marketing plans, research and development ideas, intellectual property and manufacturing processes.





# Vimian values personal information

Vimian values the personal information of its employees, customers and other stakeholders highly. You need to ensure that you comply with all relevant data protection laws, including the General Data Protection Regulation (GDPR). Do not disclose personal information of Vimian or its customers, partners, employees and other stakeholders to any third party unless you are authorized to do so.

## / **Keep it safe**

Ensure that the personal information you process is safe, secure, accurate and according to the privacy policy of the relevant company in Vimian and applicable laws.

## / **Ensure that there is a legal ground for processing the personal information.**

Such legal ground could be consent, complying with an agreement or that it is in the legitimate interest of Vimian to process the personal information.

## / **Collect only what is needed for the time needed – then destroy it**

Only collect, access and use personal information for business purposes. Be mindful of which information that is really needed and keep only personal information which you justify that you need. Ensure personal information is not retained for a longer period of time or reason than can be justified by law and that its properly destroyed.

## / **Make it accessible for the individual owning it**

We shall ensure that individuals whose personal information is held by Vimian, or its segments can access, review and correct their information.

## / **Same procedure for a colleague's personal information**

A colleague's personal information is collected and used for the purpose of the employment relationship with Vimian.

If you are unsure of your responsibilities in terms of protecting personal information you should familiarize yourself with the specific policies, guidelines and standards that Vimian and your relevant segment has adopted in these areas.

**Personal information** is any information related to an identifiable person.



# Avoid conflicts of interest

## / Be mindful of outside Vimian engagement

Vimian encourages you to engage in activities outside of work if it motivates you, brings you purpose and develops you as a person. However, avoid outside engagement e.g. outside employment, advisory roles and board seats with Vimian competitors or business partners when your judgment could be, or could appear to be, influenced in a way that could harm Vimian. It should also be avoided that you or a family member has a significant investment in one of our customers, competitors or third parties that work with Vimian.

## / Be mindful of accepting gifts

Accepting gifts and other business courtesies from a Vimian competitor or business partner can easily create the appearance of a conflict of interest, especially if the value of the item is significant. Vimian's Anti-Bribery and Anti-Corruption policy provides specific guidance on when it is appropriate to accept gifts or any other business courtesy.

## / Be mindful of relationships at work

Certain relationships (i.e. romantic, physical, or familial) within Vimian colleagues or stakeholders may compromise or be seen to compromise your ability to perform your work responsibilities, may create uncomfortable or conflicted positions, and may raise issues of fairness, favoritism, or harassment. Therefore, be mindful of how your relationships within Vimian could impact or be perceived by others.



A **conflict of interest** is a situation in which competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of Vimian. Avoid conflicts of interest and circumstances that would appear as a conflict.

If you are in doubt, review the situation with your manager, HR or legal representative.



# Do not take part in bribery or corruption

Vimian has zero tolerance for bribery and corruption. Do not bribe anybody, anytime, for any reason. Do not offer, ask, give or accept, directly or indirectly, any undue advantage for personal gain from any third party, unless it can be constituted as being within the boundaries of accepted business practices such as representation and reasonable hospitality given in the ordinary course of business.

## / **Comply with all applicable laws**

As a multinational group, Vimian shall comply with applicable national and extraterritorial anti-corruption laws, including the United States' Foreign Corrupt Practices Act (the "FCPA"), the United Kingdom Bribery Act (the "UKBA"), the Swedish Penal Code and any other anti-bribery and anti-corruption laws in the markets where we do business.

## / **Monitor laws applicable to the country(ies) you operate**

Keep in mind, monitor and follow restrictions on gifts and hospitality in your country.

## / **Read and understand Vimian's Anti-Bribery and Anti-Corruption policy**

The policy provides further guidelines of what is acceptable behavior.

## / **Take part in the annual mandatory Anti-Bribery and Anti-Corruption trainings (called "ethics training" internally)**

Reach out to Vimian's General Counsel if further trainings or guidelines are needed or to consult on specific cases.



# Anti-trust/anti-competitive practices

Vimian believes in free and open competition. Do not engage in unethical or illegal anti-competitive business practices, including:

## / **Stick to fair competition**

- Never coordinate with customers to maintain or influence resale prices.
- Never agree with a competitor to coordinate bidding to a customer or agree with a customer or competitor not to deal with other companies.
- Never take unfair advantage of a position of market dominance by engaging in anti-competitive activity.

Fair competition or anti-trust laws are complex, and compliance requirements can vary depending on facts and circumstances. Consult with the Chief Financial Officer in your segment or the General Counsel of Vimian if you have any questions or concerns about anti-competition laws.





## Financial integrity (1/2)

The integrity of Vimian's financial records is critical to the operation of Vimian business and is a key factor in maintaining the confidence and trust of our shareholders. We must ensure that all transactions are properly recorded, classified and summarized in accordance with Vimian accounting policies. Vimian is required to follow strict accounting principles and standards (IFRS), to report financial information accurately and completely, and to have appropriate internal controls and processes to ensure that accounting and financial reporting complies with legislation. Do everything you can to support Vimian's efforts in this area.

### / **Never mislead, hide or disguise**

Never enter or remove information in the company's books or records that intentionally hides, misleads or disguises the true nature of any financial or non-financial transaction or result.

### / **Be mindful and truthful**

Be mindful of company expenses and always be accurate, complete and truthful when submitting time sheets, research, quality and safety results.





## Financial integrity (2/2)

### / **Report financial information accurately and completely**

Employees involved in financial reporting shall always provide full, fair, accurate, timely and understandable disclosure in reports and documents that Vimian files with, or submits to, government agencies, tax authorities and in other public communications. Vimian follows the international guidelines and applies the national regulations relating to transfer pricing.

### / **Leave comments about financial reporting to authorized spokespersons**

Comments about financial reporting and prospects to external parties shall only be made by authorized official spokespersons.

### / **Watch out for suspicious payments**

To help prevent and detect money laundering and terrorist financing, watch out for suspicious payments e.g. payments made from personal accounts instead of business accounts; and funds from financial institutions or third parties without a logical relationship to the customer or third party.



# Suppliers and vendors

Vimian's contractual relationships with suppliers, vendors and dealers are important for our success.

## / **Be objective**

Supplier and vendor selection and purchasing decisions must be made objectively and in Vimian's best interests, striving for the best deal by evaluating costs, requirement fulfilment, expected delivery capability, quality, social and environmental impact and other relevant factors. Any agreement with a supplier and vendor should live up to the standards of Vimian's Supplier Code.

## / **Be professional**

Negotiations with suppliers, vendors and dealers should be conducted in a professional manner. Ensure that business decisions are made without any unjustified influence from a third party. Suppliers and vendors which are proven to attempt to unduly influence Vimian's purchasing decisions will be excluded from any future transaction with the company.

## / **Evaluate supplier diversity**

Provide opportunities for supplier diversity e.g., small and diverse owned businesses, those owned by minorities, disabled, underrepresented genders or others who represent global diversity.

Read Vimian's Anti-Bribery and Anti-Corruption policy and Vimian's Supplier Code for further guidelines.



# Trade sanctions

Many laws govern the conduct of trade across borders. Vimian is committed to complying with all such laws. Do not engage in any commercial relationship, directly or indirectly, with parties being subject to trade sanctions. Both legal entities and individuals can be sanctioned.

## / **Know the requirements of the country in which you operate**

If you are involved in international operations, logistics, finance, meeting planning, manufacturing and supply, research and development, regulatory or legal, it is especially important that you know and comply with the requirements associated with the countries in which you do business. Vimian shall avoid doing business with sanctioned countries. In addition, persons can be sanctioned although they are living in other countries than sanctioned countries.

## / **Maintain relevant and required records**

Maintain required import, export and customs records at each of Vimian's business locations.

## / **Consult with legal**

If you receive a request to participate in a boycott or are asked about Vimian's position on a boycott, contact the General Counsel immediately.

If you receive a request to do business with someone based in a sanctioned market, or suspect that the proposed business has anything to do with a sanctioned market, contact Vimian's General Counsel immediately.





# Political involvement

Vimian observes neutrality with regard to political parties and candidates and abides with the applicable international treaties and national legislation on lobbying activities.

- / **Never allocate Vimian's funds or resources to any political involvement**  
Vimian does not permit that any of its funds or resources are used to contribute, directly or indirectly, to any political party, political candidate or political campaign.



# Protect and promote health and safety

Vimian promotes a healthy, safe and violence free work environment, and urges all its employees and contractors to also promote this at all times. In particular, keep in mind the following:

- / **Stop any work you feel may be unsafe**

- / **Speak up**

You are encouraged to speak up and ask for help if you are not feeling well - mentally or physically.

- / **Know the emergency, occupational health and safety and security procedures that applies where you work**

- / **Always be sober at work**

Be sure that your performance is not impaired by alcohol or any drugs, including prescriptions and over-the-counter medications, while conducting Vimian related business, regardless of time or location.

- / **Report injuries, regardless of size**

Report injuries on the job, regardless of size, to a manager immediately. Do not assume that a colleague have made a report.

- / **Ensure third parties are informed on safety and security procedures**

Inform relevant third parties such as contractors and others we work to follow our safety and security procedures.

If the situation is life-threatening or an emergency, call your local police, fire, or other emergency responders first, and then report it to HR, your manager and/or [people@vimian.com](mailto:people@vimian.com).



# Quality and safety of products and services

Our customers rely on our high-quality products and services. At Vimian, we take quality and safety issues seriously. Make sure to demonstrate honesty and integrity in all marketing efforts and report any adverse events and issues that you become aware of.

## / **Ensure truthful, accurate and compliant our marketing or advertising**

All marketing and advertising material, in writing or by employed personnel, shall be accurate, truthful and comply with mandatory laws.

## / **Report all adverse events**

Report all adverse events and product and service issues to regulatory affairs, your manager, HR or Legal. You may learn of such events and issues in many different ways — through telephone calls, letters, emails, websites and completed response forms from Vimian-sponsored marketing programs, or in meetings or casual conversations at work or even in social settings.

## / **Forward all adverse incidents to pharmacovigilance**

Any information about an adverse event must be forwarded to a pharmacovigilance or regulatory colleague within 24 hours. Any product issues which are not defined as adverse events should be reported.

**Adverse events** are defined as unexpected medical occurrences associated with the use of a drug.

Only some of Vimian's products are subject to adverse event reporting. In doubt whether a particular product is comprised by the adverse event reporting obligations, please check with your colleagues in regulatory affairs.



# Protect human and labor rights

Vimian supports and respects the protection of internationally proclaimed human rights and will not be complicit in the case of human rights abuses. Vimian does not tolerate abuse of human rights in our company or any part of our value chain.

- / **Comply with all applicable human rights and labor practice laws and regulations**, e.g., UN Universal Declaration of Human Rights, UN Global Compact principles, UK Modern Slavery Act 2015.
- / **Never use forced or compulsory labor, human trafficking, debt bondage and child labor**
- / **Know that all employees should be given the freedom to work, have fair wages**
- / **Treat all employees with respect and dignity**
- / **Do not be complicit in the case of human rights abuses** – Report any suspicion or evidence of human rights abuses to Legal or anonymously through Vimian's whistleblowing channel.



# Protect animal rights and welfare

Vimian supports international efforts to promote and protect animal and human rights. Vimian does not tolerate abuse of animal rights or welfare in any part of our value chain.

- / **Comply with applicable animal welfare laws and regulations**
- / **Know and understand Vimian's Animal welfare policy.**
- / **In the case of clinical trials, know that Vimian is committed:**
  - regular monitoring of outsourced trials
  - adhere to international best practice guidelines, codes and principles
  - conduct trials in an ethical manner

Report any suspicion or evidence of animal rights abuses to Animal Welfare, Legal or anonymously through Vimian's whistleblowing channel.





# Protect the environment

Vimian is committed to sustainable and responsible environmental practices, emphasizing regulatory compliance, climate resilience, and the Science-Based Targets approach. This means using the world's resources wisely and growing our business in a way that is considerate of the global community.

/ **Comply with all applicable environmental laws and regulations**

/ **Know and understand Vimian's Environmental policy.**

/ **Be proactive**

Encourage practices that minimize negative impact on the environment. Be proactive and look for ways that we can reduce waste and use energy and natural resources more efficiently, consult with your segment's sustainability lead or the Group's Sustainability Director.

Report concerns about potential environmental risks to your manager, to your segment's HR or sustainability lead or the Group's Sustainability Director. Read more about our environmental efforts in our Environmental policy.



# Protect our assets

Each of us is entrusted with the care of Vimian's assets and we must be proactive in protecting them from loss, damage, theft, waste and improper use.

## / **Protect intellectual property**

Ensure to protect our intellectual property and respect the intellectual property rights of others.

## / **Be mindful of unauthorized devices**

Unauthorized devices, such as home computers, may not be used to transmit, store or work on Vimian proprietary information.

## / **Be wary of cyber security - protect Vimian's data and information systems**

Ensure data and information systems are protected from accidental and intentional breaches. In particular:

- Be alert to phishing scams or other attempts to uncover corporate information.
- Do not open suspicious links in emails, even if you know the source.

**Assets** include physical property, facilities, equipment, inventory and supplies, financial resources, confidential information, files and documents, computer networks and their content.

**Intellectual property (IP)** includes patents, trademarks, trade secrets, copyrights, and scientific and technical knowledge.





# Contact

## / HR

- Contact HR in your segment or [people@vimian.com](mailto:people@vimian.com)

## / Legal

- Contact Legal/General Counsel at [legal@vimian.com](mailto:legal@vimian.com)

## / Regulatory affairs and pharmacovigilance

- Contact regulatory affairs, compliance or pharmacovigilance in your segment

## / Whistleblowing

- <https://vimiangroup.whistlelink.com/>

## / Sustainability

- Group Sustainability Director at [sustainability@vimian.com](mailto:sustainability@vimian.com)

## / Animal welfare

- Animal welfare advisor at [animalwelfare@vimian.com](mailto:animalwelfare@vimian.com)

## / Vimian policies and frameworks

- available at <https://vimian.com/policies-and-procedures/>



# Appendix 1

## Basis for the Code

The Code is based on the ten principles provided by the United Nations (UN) Global Compact<sup>1</sup>. The UN Global Compact asks companies to embrace, support and enact, within their sphere of influence, areas of core values in the areas of human rights, labour standards, the environment and anti-corruption.

## Human Rights

- / Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- / Principle 2: make sure that they are not complicit in human rights abuses.

## Labour Standards

- / Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- / Principle 4: the elimination of all forms of forced and compulsory labour;
- / Principle 5: the effective abolition of child labour; and
- / Principle 6: the elimination of discrimination in respect of employment and occupation.

## Environment

- / Principle 7: Businesses should support a precautionary approach to environmental challenges;
- / Principle 8: undertake initiatives to promote greater environmental responsibility; and
- / Principle 9: encourage the development and diffusion of environmentally friendly technologies.

## Anti-Corruption

- / Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

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1. The UN Global Compact principles enjoy universal consensus and are derived from

- / the Universal Declaration of Human Rights,
- / the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work,
- / the Rio Declaration on Environment and Development,
- / the United Nations Convention Against Corruption.