Helsinn Group

CODE OF **CONDUCT** AND **ETHICS**



PARTNER IN YOUR JOURNEY
Enhancing Care, Improving Lives

HELSINN

HELSINN CODE OF CONDUCT AND ETHICS

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LETTER FROM OUR CEO: **OUR PROMISE**

Our mission at Helsinn is to champion and support patients with cancer and chronic disease at every stage of their journey. This is the promise that unites us and gives meaning to everything we do. Our scientific commitment and our ethical standing are the non-negotiable keys to delivering such ambitious promise to patients. To achieve our mission, it is therefore crucial that we conduct all aspects of our business with the highest ethical standards driven by our values of quality, integrity, and passion, fostering innovation for the patients we serve.

Our legacy as a family business guides us to place ethics and compliance at the heart of our strategy and at the foundation of our culture. Our values are deeply rooted in who we are and how we conduct our business. We firmly believe that any successful business is a compliant business, and that being trusted as an ethical partner by our stakeholders is key to our success as a corporation that tirelessly works at advancing global healthcare through innovative therapies and strong, reliable partnerships.

As Helsinn employees, we conduct our business activities with fairness, integrity, and honesty as we individually and collectively stand accountable to each other and to patients, healthcare professionals, society, and the environment, building trust with every single action we perform. For us Helsinn employees, ethics and compliance are not abstract concepts: they are lived, individually and collectively, by standing up and be accountable and by doing the right thing, even when it is difficult and even when no one is watching. This is who we are as a company.

Acting ethically also means acting sustainably by taking into consideration how we operate and act in the surrounding ecological, social, and economic environment. This is why we firmly believe in our sustainability approach, and we are fully committed at all levels to engage in it, in accordance with the United Nations Sustainable Development Goals.

This Code of Conduct and Ethics (the "Code") is an important guide that supports our everyday individual and collective decision-making. Across our company, I unquestionably trust all directors, officers, and employees to embrace this Code, to live its values and to embody its behaviors in everyday activities. I also expect our leaders and managers to lead by example, acting clearly and unequivocally as a role model to everyone else. As leaders, we must leave no room for ambiguity.

Helsinn is rooted in a culture of full transparency. I strongly encourage you to seek advice or help if you have questions or concerns, and to speak up and reach out directly to your supervisor, Human Resources, or our Compliance Department, and to use the reporting channels highlighted in this Code.

Helsinn treats all reports with the highest level of care and confidentiality and does not tolerate retaliation against anyone acting in good faith.

I wholeheartedly commit to our Code, and I expect the same commitment from each of you.

Riccardo Braglia
Helsinn Group CEO



OUR MISSION, VISION, AND VALUES

Helsinn is a trusted brand with an outstanding reputation focused on going further to bring better days to even more people with cancer.

OUR MISSION

To champion and support patients with cancer and chronic disease at every stage of their journey.

OUR VISION

To transform Helsinn into a leading oncology company driven by our focus on extending and improving the lives of people with cancer all over the world

QUALITY	INTEGRITY	RESPECT
Maintaining the highest standards means we produce world-class solutions aimed at improving the quality of life for people with cancer.	Being honest, ethical, and trustworthy is helping us become the cancer care partner of choice.	Treating our partners as we would like to be treated leads to strong, enduring relationships.





1. HOW DOES THE CODE WORK?

The Code, adopted by the Helsinn Board of Directors, sets forth the governing principles and describes the behaviours expected of all directors, employees ("Personnel") and third parties with whom we conduct business acting on Helsinn's behalf, including contractors, consultants, and our vendors (collectively, "Covered Persons"). The Code applies to Helsinn Healthcare SA and all its subsidiaries worldwide.

Helsinn is committed to compliance with the applicable law, to sustainability in business and to ethical, social and environmental responsibility, as pledged within the adopted Sustainability Policy, which terms are fully recalled in this Code. As such, the principles set out in the Code apply to all activities involving Covered Persons. Each Covered Person is responsible for reading, becoming familiar with, and complying with the Code. The laws, regulations, or codes of some countries may impose requirements that are different from those included in this Code. In such cases, you should always comply with the strictest applicable rules.

The trust placed in Helsinn, including by patients, healthcare professionals, governmental authorities, and business partners around the globe, is essential to the success of Helsinn's business, as well as to the protection of Helsinn's reputation and long-term value.

Adherence to the Code, and all applicable laws, regulations, and other codes - including the Sustainability Policy - is crucial to the ability to create and maintain such trust and, therefore, the success of Helsinn.

The Code cannot address every situation. Helsinn's policies, procedures, training, and other resources are available to provide additional guidance. If you have questions, if the right choice is not immediately clear, or, if further advice is needed, you can consult your supervisor, Human Resources, Helsinn's Compliance Department, or the Legal Department. If you learn of or suspect a violation of this Code or any other legal, regulatory, or ethical violation, you must raise it to your immediate supervisor or Departmental Manager, to the Compliance Department or anonymously through Compline Helsinn's Compliance support line or EthicsPoint.

Helsinn does not permit retaliation against anyone who raises any issues, concerns, or allegations in good faith. Helsinn is committed to enforcing our Code effectively. Any violation of this Code may lead to disciplinary action or other measures, which may include reprimands, warnings, demotion, or termination of employment, in accordance with applicable employment laws.

The Ethics Committee oversees the application of the Code across the Group, while the Compliance Department is responsible for its implementation, including training and monitoring of compliance, and reports regularly to the Ethics Committee. The Compliance Department reviews the Code yearly, and whenever changes in applicable laws, in Helsinn's business or in the outcome of its risk assessments require it. When any updates to the Code are needed, they are submitted to the Board of Directors for approval and communicated to all Covered Persons.

2. COMBATING CORRUPTION AND MONEY LAUNDERING

Helsinn firmly rejects all forms of corrupt practices. Corruption has devastating effects on society, on the environment, and is a major obstacle to economic development. Helsinn complies with international anti-corruption standards and all applicable laws, regulations, and codes against corruption, such as Article 102 of the Swiss Criminal Code, the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and the Irish Prevention of Corruption (Amendment) Act 2010. Non-compliance with these standards can have severe consequences for Helsinn and Personnel concerned.

- We interact with our stakeholders with the highest level of integrity based on the merits and the science behind our medicines.
- We comply with applicable laws in all countries to which we travel, in which we operate and where we otherwise do business, including laws prohibiting bribery, corruption and conducting business with specified individuals, companies or countries.
- We do not offer or give, directly or indirectly through third parties, payments or anything of value to any person, entity or organization, including but not limited to healthcare professionals, government agencies, officials or employees (including employees of state-owned or controlled enterprises), political parties or politicians, health plans, payers, patient organizations, patients and trade unions, for any improper purpose or to obtain or retain business or any undue advantage, and similarly refuse to accept payments for any improper purpose or to obtain or retain any undue advantage.
- We do not offer or give stakeholders any gifts, entertainment, grants, contributions, sponsorships, donations, hospitality, or anything of value in return for use, referrals, favourable formulary, or favourable treatment guideline positions, or to obtain or reward for any other preferential treatment for Helsinn or the prescription, purchase or use of Helsinn products.
- We do not contract with stakeholders for speaking services, advisory boards, scientific research or any other service in return for use, referrals, favourable formulary, or treatment guideline positions, or any other preferential treatment for Helsinn or its products.
- We do not get involved in or facilitate money laundering and do not enter into transactions without conducting applicable due diligence reviews to ensure transparency and legitimacy.

Q&A

As a marketing manager, a doctor has asked me to invite them to an international oncology workshop and cover their participation costs. They indicated "between the lines" that this support would influence whether they continue prescribing our products to their patients and push it in hospital tenders. How should I handle this situation?

You must refuse the request and immediately report it to Compliance. Any offer of financial or in-kind support that is linked, directly or indirectly, to prescribing behaviour or important administrative decisions - like tenders - creates a serious compliance and corruption risk. We are committed to ensuring that medical decisions are made independently and solely in the best interests of patients. While support for scientific or educational events may be permitted in certain circumstances and jurisdictions, it must always be based on legitimate educational criteria and must never be used as a means to influence or reward prescribing practices.

FOR MORE INFORMATION, WE ENCOURAGE YOU TO REACH OUT TO THE COMPLIANCE DEPARTMENT AND CONSULT HELSINN'S ANTI-CORRUPTION POLICY.



3. COMPETING FAIRLY

Helsinn believes in an open and competitive market that benefits patients and the healthcare system. Helsinn seeks to outperform our competition fairly and honestly. In doing so, Helsinn complies with all applicable antitrust and competition laws, regulations, and codes.

Competition and antitrust risks can arise from verbal or written arrangements between Helsinn and its competitors, suppliers, or customers. Breaching competition and antitrust standards can have significant consequences for Helsinn and Personnel concerned.

- We compete only on the merits of our products and our services.
- We never discuss with competitors or agree with them on any information related to pricing and discounts, access strategies, medical and R&D strategies, marketing strategies, commercial terms and conditions, customer or account information, costs, or any other confidential information.
- We are very careful when attending industry association meetings or during any other routine interactions with competitors, such as at medical conferences.
- We do not participate in any boycott or other abusive practices.
- We comply with all applicable customs, import and export controls, trade sanctions, and other trade compliance laws.

While we do not expect you to know the details of every law and regulation, it is important that you know when to seek advice. If you have any questions or would like more information, we encourage you to reach out to Helsinn's Compliance Department or the Legal Department.

Q&A

I am attending an industry association meeting next week. What do I need to be aware of?

These meetings are very useful for the industry but may involve certain risks, as they gather competitors who might potentially cross the line of non-compliance with competition law obligations. Even joking about marketing or pricing strategies could be misinterpreted and misreported.

If any anti-competitive matter is discussed, you must: (a) explicitly not take part in the discussion, (b) leave the discussion instantly, (c) request that your position is recorded in the meeting minutes, if there will be any, and (d) promptly report the matter to your supervisor, the Compliance Department and the Legal Department.





4. FOSTERING SUSTAINABILITY

Sustainability is at the core of Helsinn's day-to-day operations. Furthermore, Helsinn is committed to contributing to sustainable development and integrating this commitment into its business model. Helsinn has adopted a Sustainability Policy that defines a common direction across the Group and provides a structure for our sustainability management, supports non-financial reporting, promotes awareness of material topics and fosters a strong sustainability culture. Aligned with international standards and global initiatives such as the UN Global Compact and the Sustainable Development Goals, it reflects Helsinn's commitment to transparency, ethics and impact. Helsinn defined a clear sustainability vision as well as roles and responsibilities of corporate bodies involved in the management of all related topics and of those with an Environmental, Social and Governance ("ESG") impact. Helsinn's commitment to sustainable development is fully reflected in a sustainability framework made up by the following four strategic pillars:

- **Quality of Life for Our Patients.** We are committed to delivering high-quality, accessible therapies and work closely with caregivers, healthcare professionals, and advocates to improve outcomes.
- **Quality of Life for Our People.** We promote well-being, inclusion and growth, creating a safe and stimulating work environment while engaging with local communities through meaningful partnerships.
- **Quality of Life in Our Environment.** Through decarbonization, carbon neutrality and responsible resource use, we take concrete action to reduce our environmental footprint and support a more sustainable future.
- **Quality of Life in our Responsible Business.** We uphold ethical practices and transparency across our operations and supply chain, fostering trust and long-term value through strong governance and responsible sourcing.

Helsinn upholds its commitment to foster sustainability, by monitoring, communicating, and disclosing its efforts, impacts and actions in relation to sustainability through the yearly Sustainability Report based on recognized international frameworks (such as the Global Reporting Initiative (GRI) standards and the United Nations Sustainable Development Goals (SDGs)), as well as through the participation to sustainability assessments and questionnaires in order to evaluate its performance and align to best practices.



5. PROMOTING HEALTH & SAFETY

Helsinn strongly believes in a healthy and safe working environment. We are committed to protecting the health and safety of all Personnel in the workplace. Helsinn complies with all applicable health and safety laws, regulations, and codes wherever it operates.

- We care for our people and integrate health and safety principles into all aspects of our business and of our organization.
- We strive to maintain an incident-free workplace and reduce, as much as possible, incidents across the organization.
- We report any actual or potential accidents relating to security, environment, health, and safety.
- We are encouraged to proactively manage our personal health by promoting a healthy lifestyle.

Q&A

I fell in the office hall and hurt my wrist. The injury isn't bad, and I believe that it will get better on its own. I don't want others to think that our offices are not safe. Do I really need to report it?

Yes. Helsinn requires you to report all workplace accidents regardless of whether you believe that you were seriously hurt. These reports help to follow up in case of any future consequence to your health as well as identify potentially dangerous conditions that can be corrected before more serious accidents occur. Promptly reporting all accidents helps Helsinn to maintain a safe working environment for everyone.

FOR MORE INFORMATION, PLEASE REACH OUT TO HELSINN'S COMPLIANCE DEPARTMENT OR HUMAN RESOURCES.





FOR MORE INFORMATION, CONTACT HELSINN'S COMPLIANCE DEPARTMENT OR HUMAN RESOURCES.

6. REJECTING DISCRIMINATION

Helsinn fosters diversity as an integral part of its culture and is committed to encouraging and protecting diversity and inclusion in the workplace. Helsinn believes in a working environment that promotes equal opportunities, personal dignity, diversity of views, and in which there is no tolerance of harassment or discrimination.

- We do not tolerate any form of harassment or discrimination, on the basis of race, colour, religion, nationality, age, sex, gender identity or expression, sexual orientation, physical or mental disability, physical appearance, genetics, medical or personal condition, marital status, pregnancy, parenthood, political opinion, trade union membership, and/or any other characteristics protected by law.
- We provide equal treatment and opportunities for all employees, whether in recruitment, employment conditions, development, or career progression, based on transparent, objective, and fair criteria.
- We respect and promote human rights and adhere to the principles of the UN Global Compact, the UN Declaration of Human Rights, and the International Labour Organization's standards regarding child labour and minimum wage.

"We categorically reject the use of stereotypes, jokes, or any other communication, remark, or contact, whether written, verbal, or physical, that can have even the appearance of harassment or discrimination.„

Q&A

One of my colleagues recently shared a joke based on ethnicity that made me feel uncomfortable. Should I report it?

Yes. Jokes made about people because of their ethnicity, or any other personal characteristics are not acceptable at Helsinn. They undermine the respect that everyone deserves. You are encouraged to tell your colleague that you found the joke inappropriate, and you should report this behaviour to your immediate supervisor or Departmental Manager, to the Compliance Department or anonymously through Compline Helsinn's Compliance support line or EthicsPoint, as further described in Section 18 of this Code.



FOR MORE INFORMATION, CONTACT HELSINN'S COMPLIANCE DEPARTMENT OR HUMAN RESOURCES.

7. FOSTERING HUMAN RIGHTS

Helsinn is committed to respecting human rights in all activities and across the value chain. This includes, in particular, fair and safe working conditions and the health and safety of employees. Respecting human rights is a legal responsibility and an essential part of who we are and how we conduct business.

- We support and uphold internationally recognised human rights and labour standards, including the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization's Core Conventions, and we comply with all applicable laws and regulations.
- We ensure that all work is undertaken freely. No one may be required to work through threat, debt, coercion or deception. Employees are free to accept or leave employment without any form of penalty.
- We provide all employees with a written employment contract, in a language they understand, setting out the key terms and conditions of employment.
- We respect freedom of association and the right to collective bargaining, where permitted by law, and do not interfere with employees' ability to organise. We also organise town halls to keep employees informed about Helsinn's strategy and other important developments.
- We ensure fair and regular remuneration that meets or exceeds living wage standards and supports a dignified standard of living for workers and their families.
- We promote fair and healthy working conditions, including appropriate limits on working hours, adequate rest periods and paid leave, in line with applicable laws and international standards.
- We carry out due diligence in our sourcing activities, particularly for higher-risk procurement categories, to ensure our supply chain does not contribute to human rights violations.
- We respect local communities wherever we operate and are committed to listening to and addressing concerns raised by community members.
- We reject any form of forced labour, including slavery, bonded labour and human trafficking, under all circumstances.
- We do not use child labour and never employ anyone below the minimum legal working age.
- We protect young workers who are legally employed, including apprentices and interns, by ensuring they are not assigned to hazardous work or night work and that their working hours respect applicable legal limits.
- We do not engage in undeclared or illegal employment, and we actively prevent hidden or informal labour practices across our operations.
- We never withhold, confiscate, destroy or alter passports, licences or immigration documents.
- We monitor, measure and report on the impact of our commitments to human rights and society, in accordance with relevant legal and regulatory requirements.
- We expect our partners and suppliers to also uphold these standards via a commitment to our Third-Party Code of Conduct and Ethics

Q&A

During a site visit, I spoke briefly with a security guard who works for one of our external contractors. They mentioned that they systematically work very long shifts and get a full day off once a month only. I am not sure if this is normal or part of their contract, but it made me very uncomfortable. Should I raise this?

Yes, this should be raised. If workers employed by a third party are required to work excessive hours or are not given appropriate rest or leave, this may indicate a breach of labour standards and human rights. Even seemingly informal or casual remarks can point to serious issues. You should share this concern with your supervisor and report it to Helsinn's Compliance Department or Human Resources or through the available reporting channels. Respecting human rights means staying alert to potential risks and taking action when something does not feel right.

8. WORKING WITH HEALTHCARE PROFESSIONALS, HEALTHCARE ORGANIZATIONS, PATIENTS AND PATIENT ORGANIZATIONS

Helsinn rigorously complies with the principles of integrity, fairness, and honesty in the conduct of its business and in its relations with Healthcare Professionals, Healthcare Organizations, Patients and Patient Organizations.

- We cooperate with Healthcare Professionals and Healthcare Organizations to research and develop healthcare products intended to meet Patients' and Healthcare Professionals' unmet needs.
- We interact with Healthcare Professionals and Healthcare Organizations based on a legitimate scientific or business need and always in the best interest of patients
- We interact with Healthcare Professionals and Healthcare Organizations to foster scientific information about diseases and the effective use of healthcare products, in line with all applicable laws, regulations and codes. We work with Patients and Patient Organizations to increase disease awareness and improve patient care
- We work with Healthcare Professionals and Healthcare Organizations to obtain their advice to better structure and implement our activities in the interest of patients. We listen to patients' needs and opinions on the impact of their conditions and treatments on their everyday life.
- We provide Healthcare Professionals, Healthcare Organizations, Patients and Patient Organizations with factual, objective, and evidence-based scientific information, without raising unfounded hopes or being misleading.
- We ensure the safety and protect the rights of patients participating in clinical trials.
- We do not supply Healthcare Professionals, Healthcare Organizations, Patients and Patient Organizations, with anything of value, to inappropriately obtain favourable treatment for Helsinn or its products

Q&A

I'm very happy that we approved the grant request from the National Patient Organization for their seminar. At the same time, I want them to clearly understand that if we provide them with the grant, they must speak very positively about Helsinn in public, for example at their press conference at the congress in Munich next month. Can I share these expectations with them?

No. Helsinn provides financial support to Patient Organizations, including via grants, as we believe it is important to support their activities in the interest of patients. You may not link or condition the financial support to any favourable treatment of Helsinn or its product.

FOR MORE INFORMATION, CONTACT HELSINN'S COMPLIANCE DEPARTMENT.



9. COOPERATING WITH THIRD PARTIES

Helsinn expects all third parties to fully comply with the principles of integrity, fairness, and honesty in the conduct of business. Helsinn may be held accountable for the behaviours of its commercial partners and therefore it strives to select the most appropriate business partners with rigor and maintains fair relationships with them.

- We consider the human rights standards, policies, and activities of our third parties and suppliers as a critical selection criterion for our engagements.
- We systematically inform our third parties of our ethics and compliance expectations through our Third-Party Code of Conduct.
- We remain alert for any unusual behaviour or information regarding any of our third parties that may indicate inappropriate behaviour, especially relating to payments and expense reimbursements.

"We perform due diligence on our potential third parties to ensure they have the capability and reputation to enter into a business relationship with us and that they have demonstrated respect for ethical principles equivalent to those in this Code.„

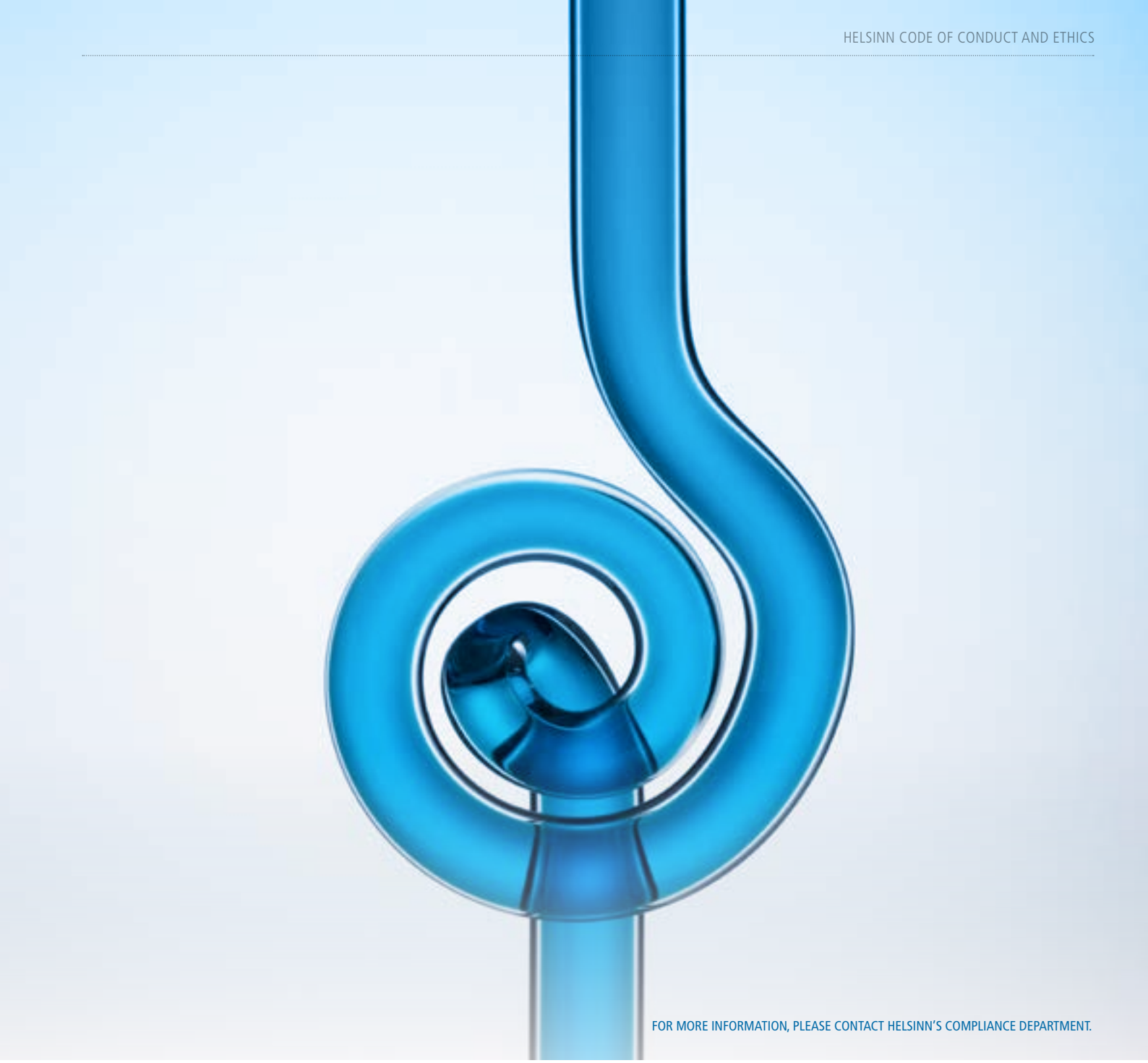
Q&A

On the morning news, I saw that our distributor was involved in a donation scandal to a foundation. What should I do? We do not deal with distributors in my department.

You should promptly inform your manager and Helsinn's Compliance Department, regardless of the fact that you work in a department that does not deal with distributors directly. This may be a very serious matter. Helsinn may be accountable for the behaviours of its commercial partners and, as such, prompt reports of any potentially inappropriate behaviour are vital to protecting Helsinn's reputation.

FOR MORE INFORMATION, PLEASE CONTACT HELSINN'S COMPLIANCE DEPARTMENT AND CONSULT THE THIRD-PARTY RISK MANAGEMENT PROCEDURE.





FOR MORE INFORMATION, PLEASE CONTACT HELSINN'S COMPLIANCE DEPARTMENT.

10. ENSURING BUSINESS CONTINUITY

Helsinn believes that ensuring appropriate business continuity and crisis management is key to its reputation and credibility as a trusted healthcare partner.

- We strive to address any disruption to our business with the highest level of professionalism and urgency.
- We communicate transparently to the public and to the partners and stakeholders that may be impacted by the crisis or disruption, about the nature, magnitude and impact of the related events.

"We design, implement and monitor plans to manage crises and to promptly recover and restore critical functions which have been partially or completely interrupted in order to minimize disruption to our business, to the business of our partners, to stakeholders and also to protect Helsinn's reputation.„

11. DELIVERING RESPONSIBLE AND COMPLIANT PROMOTION

Helsinn believes in promoting its products, directly or through its partners, in a responsible manner and in compliance with applicable laws and regulations.

- We promote our products only after they have received regulatory approval and only for the indications approved by the relevant authorities.
- We promote our products only to appropriate healthcare professionals and organizations, and to patients, where permitted by applicable laws and regulations, and we communicate product information that is truthful, not misleading, fair, balanced, objective, complete, accurate, adequately substantiated, up-to-date, and that complies with applicable laws, regulations, and codes.
- All promotional materials are reviewed and approved under the applicable Helsinn procedures prior to their use. Helsinn Personnel or agents may not modify materials approved through Helsinn procedures for use in promotional activities, e.g., by editing, highlighting, or revisions of any kind.

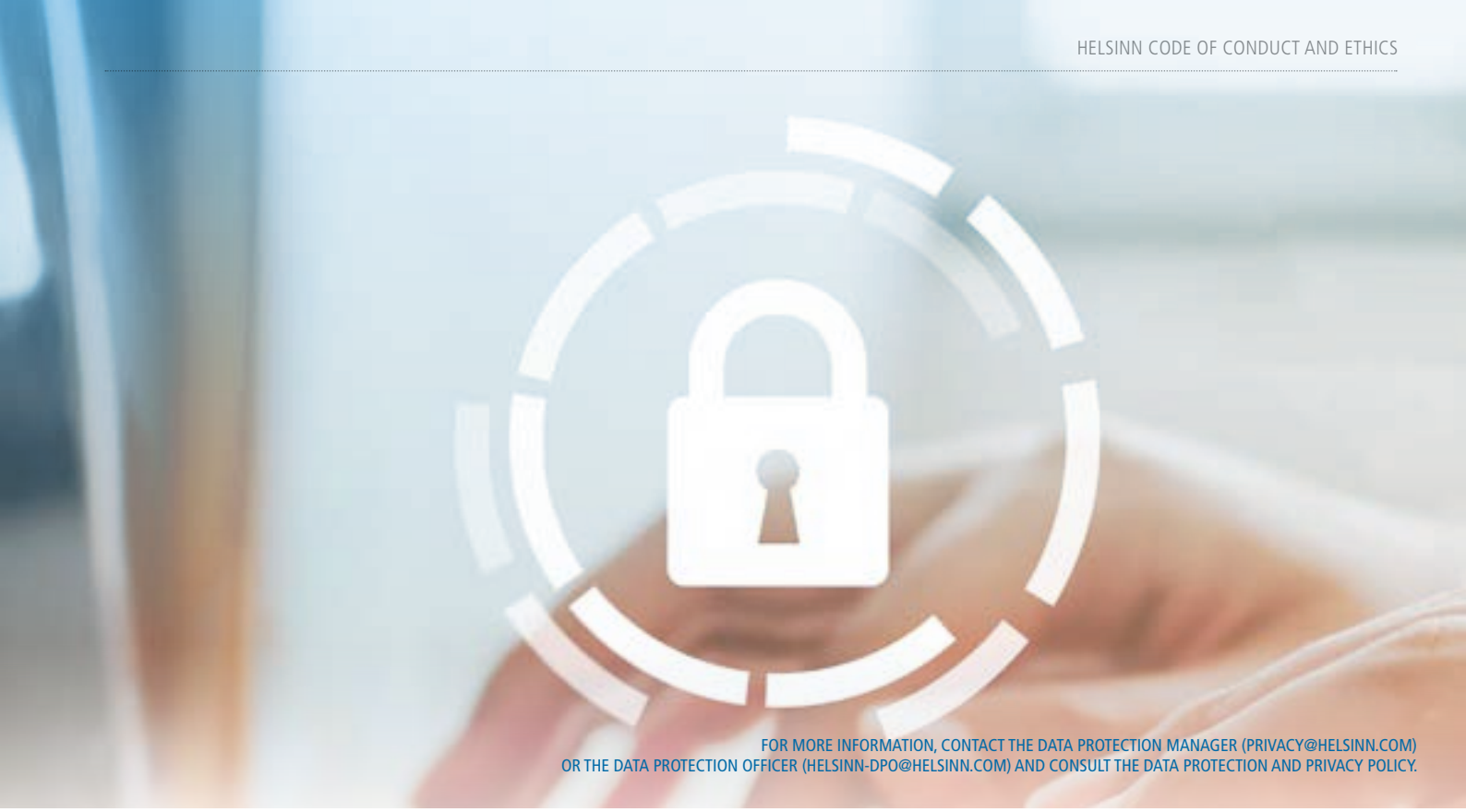
Q&A

As a marketing manager in oncology, I am enthusiastic about our upcoming product and have identified some recent scientific publications containing very promising new data that could be extremely valuable for patient care. Can I proactively distribute these journal articles to healthcare professionals, or must I wait for the approved materials?

You must wait for formal approval before sharing any product-related information. Even when publications contain high-quality or clinically relevant data, all scientific and promotional materials, including journal articles and congress content, must be reviewed and approved through Helsinn's internal processes before being used for promotional purposes. This is essential to ensure that communications remain accurate, balanced, and strictly limited to approved indications. Sharing such materials without approval creates a significant off-label promotion risk and can expose the company to serious regulatory and compliance consequences. Following the internal review process protects both you and the organisation, while ensuring that healthcare professionals receive validated and appropriate information.

FOR MORE INFORMATION, CONTACT HELSINN'S COMPLIANCE DEPARTMENT.





FOR MORE INFORMATION, CONTACT THE DATA PROTECTION MANAGER (PRIVACY@HELSINN.COM) OR THE DATA PROTECTION OFFICER (HELSINN-DPO@HELSINN.COM) AND CONSULT THE DATA PROTECTION AND PRIVACY POLICY.

12. RESPECTING DATA PRIVACY

Helsinn is committed to promoting the privacy and security of all data that Helsinn collects from individuals with whom it interacts. Helsinn is committed to complying with all data protection laws, regulations, and codes applicable to its operations and, to this end, has set up an appropriate data protection and privacy compliance program governing the processing of personal data.

- We are committed to processing personal data in compliance with all applicable laws and regulations and Helsinn policies.
- We are committed to processing personal data only for specified, lawful and legitimate purposes.
- We are committed to maintaining the accuracy and completeness of the personal data we process, considering the nature of the data and the purposes for which they are collected.
- We strive to store personal data of the data subject for only as long as reasonably necessary to support specified, lawful, and legitimate purposes.
- We are committed to honouring requests from individuals to exercise the rights they may have under applicable laws in relation to their personal data.
- We are committed to disclosing personal data to third parties only when authorized or required under applicable laws.
- When transferring personal data across international borders, we are committed to complying with applicable requirements.
- We are committed to retaining personal data in accordance with Helsinn's Records Retention Policy and its Data Protection and Privacy Policy, for the limited purpose or purposes and the limited time for which they are authorized to be collected or processed, in accordance with applicable local and international regulatory requirements.

Q&A

A supplier's employee asked me for the personal phone number of one of our Department Heads. She tells me they already know each other socially. Can I share his number with her?

No. You must treat all Helsinn Personnel personal data as strictly confidential. You may, however, contact the Department Head, talk about the supplier employee's request, and let her decide whether to share the phone number or have the supplier employee contact her directly.



FOR MORE INFORMATION, PLEASE REACH OUT TO THE QUALITY DEPARTMENT.

13. GUARANTEEING QUALITY

Helsinn is committed to a culture of quality and regulatory compliance for all its products and services. Helsinn expects all Personnel and external collaborators to understand the importance of applying the principles of good ethics, honesty, and integrity to all their actions and decisions in order to protect patients.

- We regard quality as a priority in all aspects of our work and as a competitive advantage that creates value.
- We commit to meet regulatory expectations and adhere to applicable laws in all our activities.
- We consider the best interest of the patient in all our decisions.
- We regularly take into consideration feedback from the market, patients, and business partners, as well as technology advancements.
- We believe in transparent communication and collaboration with key stakeholders.
- It is our responsibility to report information that we become aware of that could be relevant to the safety of any of our products to Pharmacovigilance.

"We believe developing, manufacturing, and delivering high quality, safe, and effective medicines in order to make Helsinn a better, more reliable, and valuable partner for patients, regulators, and business partners."

Q&A

At a dinner party organized by my tennis association, I told the person sitting next to me that I work at Helsinn. He responded that he is using one of our products. He added that he is happy with the treatment but that he nevertheless gets severe headaches when he wakes up, but added that it was not serious, as it is only for a few minutes after waking. Do I have to report this to Pharmacovigilance?

Yes. You must report this potential adverse event to Pharmacovigilance as soon as possible within 24 hours. You must report any potential adverse event, regardless of whether you heard about it in the conduct of your job at Helsinn or in a personal context, and regardless of whether it appears to be serious or not.

14. ACTING WITH FINANCIAL INTEGRITY

Helsinn protects the integrity of its cash assets and securities, bank accounts, credit standing, and financial records.

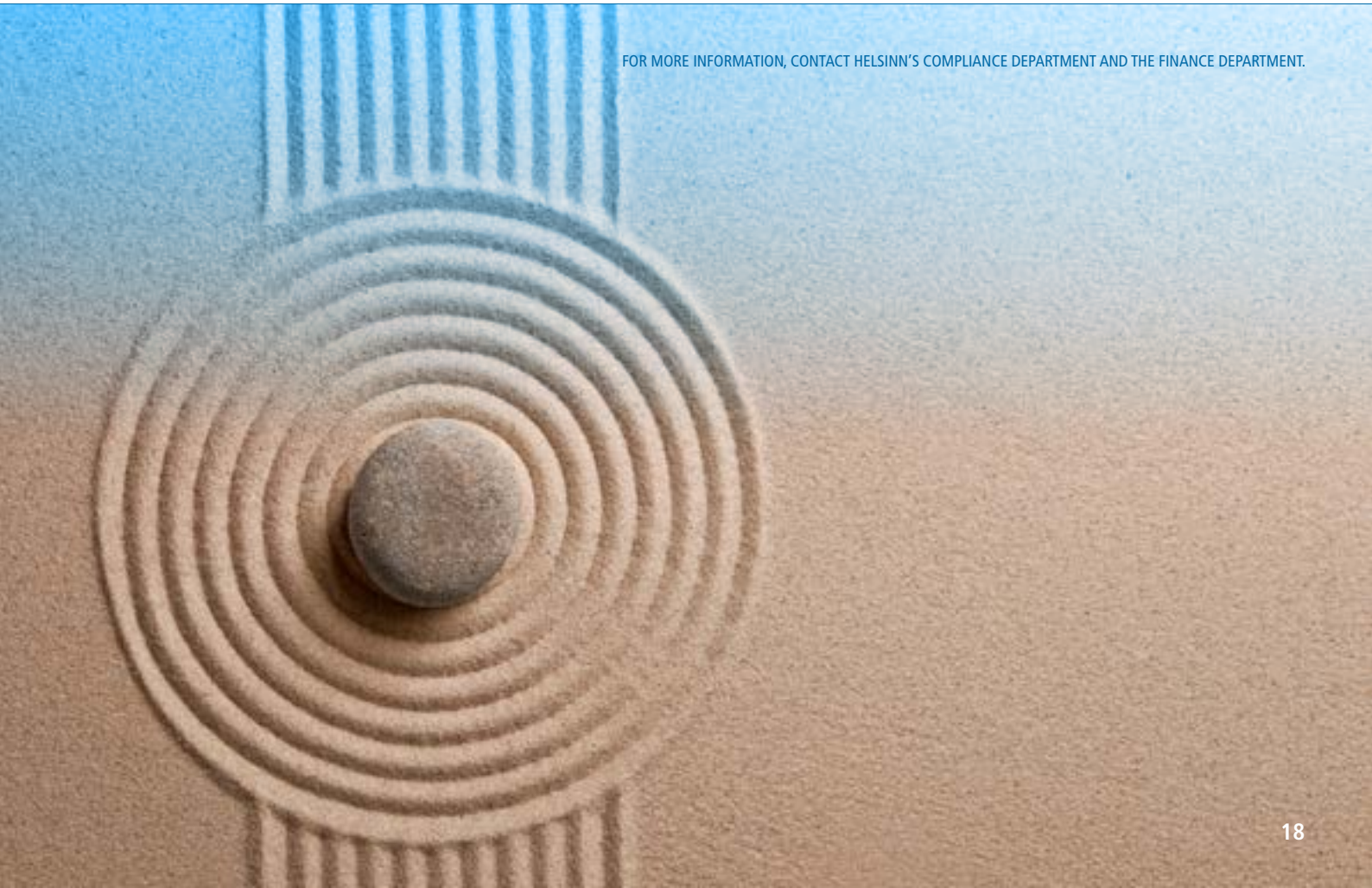
- We take great care to protect these and other financial assets and keep them secure.
- We manage budgets responsibly.
- We comply with applicable accounting controls, financial policies, and guidelines related to sourcing and purchasing.
- We maintain internal controls to ensure the integrity of financial and accounting information, including books and records that are maintained in reasonable detail and fairly and accurately reflect Helsinn's financial position and all transactions (expenses and revenues) in accordance with all applicable financial reporting standards. We do not override Helsinn's established system of internal control over financial reporting and disclosure controls and procedures.
- We do not make any false, artificial, or misleading entries in our books and records for any reason.
- We do not maintain unrecorded or "off-the-books" funds, assets, or liabilities under any circumstances.
- We do not take any action to fraudulently induce, coerce, manipulate, or mislead any auditor engaged in the performance of an audit of Helsinn's financial statements.

Q&A

I am due to receive a rebate cheque from a supplier for meeting certain volume purchase requirements. We are under our purchases budget in the current year. Is it acceptable to ask the vendor to delay sending the check until next year to cover unforeseen contingencies in next year's budget?

No. You must record receipts in the period they are earned, regardless of budgetary impact.

"We maintain internal controls to ensure the integrity of financial and accounting information, including books and records that are maintained in reasonable detail and fairly and accurately reflect Helsinn's financial position and all transactions (expenses and revenues) in accordance with all applicable financial reporting standards [...].„



FOR MORE INFORMATION, CONTACT HELSINN'S COMPLIANCE DEPARTMENT AND THE FINANCE DEPARTMENT.

15. AVOIDING CONFLICTS OF INTEREST

Helsinn is committed to identifying, avoiding, and resolving any conflict of interest situation in its organization. A conflict of interest, whether potential or actual, can seriously damage Helsinn's reputation and have repercussions on those involved.

- We make decisions based on what is best for Helsinn and the patients we serve, and do not use one's position in Helsinn for one's own advantage or to benefit friends or relatives or take (for ourselves or others) business opportunities that belong to Helsinn.
- We avoid situations of conflicting interests with Helsinn.
- We promptly disclose all actual, potential, or perceived conflicts of interest to our supervisor, Helsinn's Compliance Department, or through the available channels in compliance with Helsinn's policies and procedures.
- We do not accept any gifts, hospitality, or entertainment that may affect our independent judgment when acting in Helsinn's interest.

"We do not accept any gifts, hospitality, or entertainment that may affect our independent judgment when acting in Helsinn's interest.„

Q&A

My boyfriend has recently joined the senior management team of a digital agency that is being considered to support a new Helsinn brand. I am not involved in the procurement process and do not take part in supplier selection. Do I still need to declare this situation?

Yes. You are required to disclose this potential conflict of interest. Even if you are not directly involved in the decision, personal relationships with external partners can create the appearance of bias or undue influence. Being transparent protects both your integrity and Helsinn's decision-making processes. You should report the situation in line with Helsinn's conflict of interest disclosure procedures so that it can be reviewed and managed appropriately.

FOR MORE INFORMATION, CONTACT HELSINN'S COMPLIANCE DEPARTMENT AND CONSULT THE CONFLICTS OF INTEREST POLICY





FOR MORE INFORMATION, PLEASE CONTACT HELSINN'S COMPLIANCE DEPARTMENT OR CONSULT THE CONFIDENTIAL INFORMATION POLICY OR THE DATA PROTECTION AND PRIVACY POLICY.

16. PROTECTING HELSINN'S ASSETS AND CONFIDENTIAL INFORMATION; ENSURING INFORMATION SECURITY

Helsinn expects that its electronic and physical assets, resources, and confidential information are treated and used in a responsible and safe manner, and that the confidentiality of Helsinn's and third parties' confidential information is protected.

- We have a duty to protect the assets, resources, systems, and infrastructure of Helsinn and of our business partners, and to use them in a responsible and appropriate way. This includes immediately reporting any suspected incident involving fraud, accidental disclosure, loss, accidental deletion, or any other potential compromise of the security, integrity, availability, or confidentiality of Helsinn assets or information.
- We preserve confidentiality in relation to all sensitive information and business secrets and take all reasonable measures available to protect such information and prevent its unauthorized use or disclosure.
- Our protocols are designed to ensure that intellectual property and confidential information are managed and protected adequately and to ensure compliance with legal and/or contractual obligations.
- We implement appropriate physical, technical, and organizational security measures to maintain confidentiality, security integrity, and availability of data.
- We undertake to protect confidential information against loss or theft, as well as from unauthorized access, unlawful disclosure, copying, use, or modification, regardless of the format in which the data is stored.

"We do not disclose confidential information to others or use it in any improper way or in any way other than for authorized purposes.„

Q&A

What should I do if I come across an online forum that is discussing clinical trial information that I believe to be proprietary to Helsinn and not yet officially been disclosed?

You must immediately refer the matter to Helsinn's Compliance Department or the Legal Department. Each director or employee is responsible for protecting Helsinn's confidential information.

17. PREVENTING INSIDER TRADING

Helsinn does not allow trading in its securities or other stocks, or securities based on material non-public information such as financial condition, corporate strategies, strategic partnerships, significant new product or candidates, pending or ongoing litigation, executive management changes, mergers and acquisitions, or clinical research outcomes. Insider trading is an offence and may result in criminal prosecution.

- We and our families must be familiar with and comply with Helsinn's policies and procedures on insider trading and the sale and purchase of securities.
- We do not use non-public information that we may have heard to trade on Helsinn's or any other company's stocks or securities.
- We do not provide material non-public information to other persons who may trade on the basis of that information (*e.g.,* "tipping").
- We do not trade shares during blackout periods, including after non-public information has been formally published, as detailed in Helsinn's Insider Trading Policy.

Q&A

I am working with a partner, and I've become aware in a confidential meeting that our partner is on the verge of a major scientific breakthrough. I want to purchase some stock in our partner. May I?

No. You may not use confidential information gained through your role with Helsinn, before the information is known publicly, to buy or sell the securities of any other company with which Helsinn has or maybe considering a relationship. Nor can you give inside information to anyone else so that they can trade.

FOR MORE INFORMATION, CONTACT HELSINN'S COMPLIANCE DEPARTMENT AND CONSULT THE INSIDER TRADING POLICY.





FOR MORE INFORMATION, WE ENCOURAGE YOU TO ASK HELSINN'S COMPLIANCE DEPARTMENT AND THE COMMUNICATION DEPARTMENT.

18. ENSURING RESPONSIBLE COMMUNICATION AND APPROPRIATE DISCLOSURE

Helsinn understands that our communications may have serious consequences for our company and its reputation. Inappropriate use of social media or other communication channels can pose risks to Helsinn's confidential and proprietary information and can jeopardise Helsinn's reputation and its compliance with laws, regulations, and codes. Helsinn respects its Personnel' personal views, but any representation of such views must be made in an individual capacity and never on behalf of Helsinn.

- We are accountable for communicating externally in a responsible manner.
- We make full, fair, accurate, timely, and understandable disclosures in all material respects about our financial condition and results of operations in our reports, and our other public communications, including the yearly Sustainability Report through which we communicate and disclose our efforts, impacts and actions in relation to sustainability.
- We use social media and the Internet in a responsible way and you must not speak on Helsinn's behalf without permission, disclose Helsinn's confidential or non-public information, or discuss our marketed or investigational products without appropriate authorization.
- Only authorized individuals may respond to questions from the media. Individuals who are not authorized to respond must refer all media questions to authorized spokespersons.

"We communicate fairly, objectively, and in a balanced and respectful manner at all times and on all media.„

Q&A

We recently had a great meeting with our sales team. I took several great pictures of our team during the meeting. May I publish them on my personal Instagram account?

No. You may not post pictures of any Helsinn meetings on any social network without approval from the Communications Department. Posting photos may accidentally reveal confidential or strategic information, or you may even end up being accused of inappropriately promoting our products. Additionally, this could constitute a violation of privacy if this picture was shared without first receiving permission from all colleagues in the photo.



FOR MORE INFORMATION,
CONTACT HELSINN'S COMPLIANCE DEPARTMENT AND CONSULT THE SPEAK UP POLICY.

19. REPORTING ACTUAL OR SUSPECTED COMPLIANCE VIOLATIONS

Helsinn Personnel must report, and third parties are encouraged to report, potential violations of this Code or any law, regulation, other Helsinn policy or procedure, or other ethical or contractual obligation, including questionable accounting or auditing matters ("**Potential Misconduct**"), immediately upon discovery.

Potential Misconduct should be reported to your immediate supervisor or Departmental Manager, to Helsinn's Compliance Department as follows, to a local Compliance Department, or on an anonymous basis:

Group Compliance Department
Pambio-Noranco (Lugano), Switzerland
Via e-mail: compliance@helsinn.com
By telephone: +41 91 985 21 21

You may report actual or suspected violations anonymously using EthicsPoint - Helsinn Group, by submitting an online report or by calling the external compliance support line, which is managed by an independent third party to ensure confidentiality.

Anonymous reports will be accepted, but those making a report are encouraged to identify themselves on a voluntary basis in case more information is needed to fully and fairly investigate and resolve the report. Helsinn will maintain the confidentiality of the Reporting Person's identity to the extent practicable. However, a Reporting Person's identity may be required to disclosed on a need-to-know basis to conduct a thorough investigation, to comply with the law, or to provide accused individuals their legal rights of defence.
For more information, contact Helsinn's Compliance Department and consult the Speak up Policy.

Helsinn is committed to taking prompt and consistent action, as appropriate, in response to reported or otherwise potential Misconduct. If Personnel is involved in an investigation, full cooperation will be expected by providing complete and truthful information in a timely manner. Helsinn will not tolerate retaliation against individuals for raising good faith reports of Misconduct. You are strongly encouraged to seek advice or help if you have questions or concerns related to this Code.

Q&A

What should I expect after I report a concern to the Compliance Department?

The Compliance Department intention is to respond professionally to all questions and reported concerns. If your report requires investigation, Compliance will conduct the investigation in an appropriate manner and, where possible and if appropriate, provide periodic status updates.

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