

Code of conduct

BioGaia[®]
Supporting your invisible heroes

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Introduction to code of conduct

Purpose

The Code of Conduct (hereinafter referred to as the Code) has been adopted to set standards with which employees at BioGaia must comply. The Code also refers to relevant Group policies where more detailed information about each topic is available.

In cases where local law or customs impose higher standards than those set in the Code, local law and customs shall always prevail. If, on the other hand, the Code establishes a higher standard, the Code shall take precedence.

Scope

The Code applies to all employees of the BioGaia Group (the "Employees"). The code also applies to agents, consultants, and temporary employees when they are working for BioGaia.

Responsibility

The CEO of BioGaia is ultimately responsible for the Code and, together with Executive Management, must ensure that the Code is communicated and implemented throughout BioGaia.

It is the responsibility of every manager to lead by example and to provide guidance to all employees who report to them. All employees are, however, individually responsible for reading, understanding and complying with the Code and referenced policy documents. Employees who believe that the ethical standards may have been compromised have a duty to raise their concerns.

Violations of the Code

Employees shall report any violations of the Code to their immediate manager. Where reporting to one's immediate manager is not possible, a higher-level manager should be contacted. If violations of the Code cannot be addressed with the immediate manager or a higher-manager or if the employee is not satisfied with the response they have received from the manager, the whistleblowing team can be contacted for further guidance. The manager receiving information about a violation of the Code shall take further action, even if a senior manager is involved.

If an employee wishes to report a suspicion or ask a question anonymously, they can do this through the company's whistleblower function. The whistleblower will never incur any form of sanction or personal disadvantage as a result of whistleblowing. It does not matter if an incident reported by a whistleblower is a misunderstanding on behalf of the whistleblower, provided they have acted in good faith.

The whistleblower reporting platform can be accessed from the company webpage or by using the following link: <https://report.whistleb.com/en/biogaia>

More information about the whistleblower function can be found in the **Whistleblowing Guidelines**.

Our values

BioGaia's values are the core of everything we do. The values influence our daily behaviour and guide us in our choices.

- **Innovation** we strive for breakthrough solutions that make a difference in people's lives.
- **Collaboration** trust, helpfulness and curiosity define our way of working.
- **Passion** we are committed and put our hearts into everything we do.

Healthy planet

At BioGaia, employees should always consider and minimise the environmental impact of any business activities. The company's environmental footprint as a result of its activities and products throughout the value chain shall be limited. If a business partner or supplier is found to act in a way that severely neglects its impact on the environment, this must be reported to the employee's immediate manager. Sustainability improvements made within the company or within the operations of suppliers or partners should be recognised and encouraged.

When planning travel, the potential value to the business shall be weighed against the impact on an employee's well-being, total time spent, total costs for the trip and the total environmental impact. Achieving the purpose of the trip through other means shall be considered.

The environmental impact of our products throughout their life cycle (value chain) shall be continuously improved and taken into account during any product development projects.

Healthy Business

At BioGaia, all business must be conducted in a lawful, ethical and honest way in every territory in which the company is present. Employees are encouraged to do more than just what is legally required.

Business Integrity

Anti-corruption

Bribes, kickbacks, or unlawful facilitation payments to obtain or retain customers, or gain any other kind of business advantage, are never acceptable. If an employee is offered such a payment, regardless of the amount, the legal department should be contacted. Modest gifts or entertainment offered by a customer, supplier or other business partner are acceptable provided they are not intended to influence a business decision.

Avoid conflicts of interest

Conflicts of interest within BioGaia should be avoided and must be reported if identified. Significant business investments, positions on the board, side jobs, advisory roles with partners/customers, and suppliers or competitors of BioGaia must receive prior approval from the employee's immediate manager. Employees who have a relative or close friend working for a partner/customer, supplier or competitor must notify their manager prior to conducting any business with a partner/customer, supplier or competitor.

Interactions with the scientific community

When interacting with the scientific community, the highest standards of integrity and honesty must be applied. BioGaia's standard contracts and terms must always be used.

Fair competition

Discussions with competitors about pricing, terms of sale or other matters are prohibited by law and must never occur.

Creating and managing business records

Business records/information, such as in external reports, shall be accurate and reliable, enabling business partners, government officials, investors and the public to trust the information provided.

Please also review the **Anti-Corruption Policy, Conflict of Interest Policy**.

Human Rights and Working Environment

Employee wellbeing

BioGaia strives to create a workplace that is inclusive, developing, and meaningful for employees, and a place where everyone feels welcome, inspired and safe. BioGaia strives to create a workplace that helps employees cultivate and maintain a healthy lifestyle and long-term physical and mental wellbeing.

Diversity

BioGaia's workplace consists of people of many different skills, abilities, backgrounds, cultures, and gender. Diversity brings many benefits to the business.

Equal opportunities

Employment decisions and promotion opportunities shall be based on merit alone.

Discrimination and harassment

BioGaia condemns any form of harassment and discrimination, including any harassment or discrimination based on characteristics protected by applicable laws and regulations (e.g., race, religion, gender, age, sexual orientation and so on). Violence in the workplace is never tolerated. No employee shall be bullied, intimidated, or abused for any reason. Sexual harassment, including unwanted sexual advances or insulting jokes, is never permitted and must be reported if it occurs.

Health and safety

BioGaia is committed to providing a safe and healthy workplace for all its employees. Unhealthy workloads and work demands are not encouraged and should be avoided. The workplace is continuously assessed to minimise the risk of any injuries. Conditions identified that present a safety hazard should be reported immediately to the immediate manager or the person responsible for health and safety at the facility.

Employees, subcontractors, and vendors working at BioGaia's premises are expected to identify and understand the risks associated with their work, manage such risks responsibly and only perform work according to the applicable safety rules and for which adequate training has been provided.

Please also review the **Diversity Policy and Work Environment Policy**.

Impact along the value chain

BioGaia's impact along the value chain is subject to continuous assessment and improvement. BioGaia is committed to working to ensure that all suppliers and partners adhere to standards of business conduct consistent with those of BioGaia. This entails compliance with laws, regulations, international agreements on human rights and decent working conditions according to internationally accepted labour standards (e.g. ILO). BioGaia has a zero-tolerance policy regarding child or forced labour. Any third party shall respect the rights of employees to form and join trade unions of their choice, including labour organisations, and shall, at a minimum, comply with the requirements of applicable laws, rules, regulations and industry standards concerning working hours and minimum wages. If unethical behaviour or non-compliance is found in the value chain, it should be reported and acted upon.

Sustainability improvements (e.g., environment, human rights and working conditions) made within the company or within the operations of suppliers or partners shall be recognised and encouraged.

Please also review the **Code of Conduct for suppliers/partners of BioGaia**

Healthy products

Safety

All BioGaia products shall be developed to be deemed safe, sustainable, and of high quality and shall always be well documented regarding safety and efficacy through clinical studies.

Marketing

Information to partners (customers) and consumers about our products shall be communicated responsibly and must be accurate and transparent. Products may only be marketed using claims that are truthful, accurate, clearly distinguishable, and balanced. Products shall only be marketed using health claims that can be supported by results from clinical trials and otherwise compliant with laws and regulations.

Research

Ethical standards must be applied to all preclinical and clinical research in which BioGaia is involved. The aim with all research is to be as transparent as possible, and researchers shall always be encouraged to make study results publicly available. Thus, in all clinical studies supported by BioGaia, there must be local ethical approval of the study protocol. Further, BioGaia requires that researchers adhere to the Helsinki Declaration's ethical principles for medical research. Research involving animals must be justified and shall only be performed after replacement, reduction and refinement of animal studies have been considered.

Protection of assets and confidential information

Intellectual property

BioGaia is a science-based company with intellectual property, i.e., patents, trademarks, and know-how, as a key company asset. Employees shall ensure to protect such assets, e.g., by keeping confidential information confidential or only share information (after consulting the Legal department) under a specific non-disclosure agreement.

Confidential Information

Any employee who has access to confidential information owned by BioGaia, including inside information for which specific policy applies as well as information owned by third parties must safeguard the information at all times. Such information may be financial information, business plans, technical information, information about co-workers, customers, or other sensitive information.

Personal Data

The privacy of the company's stakeholders (e.g., employees, business partners and consumers) should be safeguarded and applicable data protection regulations shall be adhered to, enabling persons with whom BioGaia interacts to always feel confident that BioGaia respects and safeguards their privacy.

Information Security

If business information is mistakenly disclosed, or if there is a suspicion that information has been stolen, the legal department should be contacted. In situations concerning digital information, the IT department should also be contacted for immediate action.

Please also review the **Information Security Policy**, **Insider Trading Policy**.

Unified voice

At BioGaia, a unified voice means that all communication is consistent.

Communication is the responsibility of the CEO. Every employee is responsible for following the communication guidelines set out by the CEO.

The CEO is the primary spokesperson for BioGaia. When necessary, the CEO may delegate this responsibility to other functions within the company, preferably a member of Executive Management. If an employee who is not a member of Executive Management is contacted by the media, he or she shall refer the journalist/person to a member of Executive Management.

All Employees shall carefully consider their engagement in social media when acting on behalf of BioGaia.

Please also review the **Communication Policy**

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