

Acting with Trust and Purpose — the BioGaia Way

Code of Conduct **BioGaia**[®]



Our roots

BioGaia's story has always been about more than bacteria. It's about belief in people, in innovation, in nature and in the power to do good.

The name BioGaia tells our story. "Bio" stands for life, and "Gaia" for Earth – together symbolizing the connection between people, nature, and science that defines who we are.

Our journey began in the late 1980s and took shape as BioGaia AB in 1990. What started with curiosity about how nature supports health has grown into a global company built on science, innovation, integrity, and care for people.

From the start, BioGaia's founders believed that great science should serve a human purpose – improving everyday lives and supporting well-being across generations. That belief con-

tinues to guide us today, reminding us that how we act is just as important as what we achieve.

Our heritage is the foundation of how we conduct ourselves – with respect, transparency, and accountability. It shapes the choices we make and the standards we uphold in our daily work, honoring the bond between human and planetary health that defines BioGaia.

As we continue to grow, our guiding principles remains the same: to make a positive difference through passion, innovation and collaboration. These three values guide how we work together, how we care for one another, and how we create value for the world around us.

Every one of us carries this legacy forward. By acting with integrity and living our values, we ensure that BioGaia remains a company people can trust – today and for the future.

This is who we are. This is how we act. The BioGaia way.



Letter from the Chairman

Dear colleagues,

BioGaia's continued success depends on our greatest asset, our people and the integrity they bring to everything we do. Acting with honesty, fairness, and respect is not only expected of us; it is what defines us.

Our Code of Conduct expresses who we are and how we work. It guides our daily decisions and reminds us that each action, no matter how small, contributes to the trust we have built over more than three decades.

We work in a field where credibility, safety, and science are essential, and our reputation rests on both the quality of our products and the integrity behind them. Each of us has the responsibility to follow not only the rules, but also the spirit of this Code, and to seek guidance whenever in doubt.

Leaders across BioGaia, from the Board and executive team to managers and project leads, play a vital role in nurturing a culture where integrity, respect, and openness guide every decision. Together we create an environment where doing what's right comes naturally.

Our history, our mission, and our people make BioGaia truly special. As we move forward, let us build on our foundation of trust, responsibility, and care while continually striving to evolve. I am proud to serve alongside all of you as we continue to build a company defined by trust and responsibility – today and for generations to come.

"Each action, no matter how small, contributes to the trust we have built over more than three decades."

Mauricio Graber
Chairman of the Board

BioGaia Way

As you navigate an ever-changing business landscape, it is crucial to understand that every decision you make carries risks – from potential threats and uncertainties to missed opportunities. In our daily tasks, the right decision is sometimes clear but often requires careful judgment and balance.

Our Code of Conduct is your guide to responsible decision-making. We expect you to approach your work with a mindset of individual accountability, considering risks carefully and never compromising our integrity. By acting responsibly in everything you do, you play a vital role in achieving our vision to be the most trusted probiotic brand in the world.

Navigating within the principles of our Code of Conduct is essential to maintaining our license to operate and the success of our business. Your commitment to these principles strengthens our integrity, supports sound decisions, and reinforces our collective reputation in the industry.

FOLLOW
laws, regulations and ethical standards

RESPECT
human rights, equality and diversity

BioGaia Way

“The BioGaia Way means a sound balance between risk and reward, standing for trust, quality and respect – in every decision we make – and never compromising on integrity.”

PREVENT
corruption and conflicts of interest

SUPPORT
sustainable growth and well-being

PROTECT
data, assets and our reputation

What is BioGaia's Code of Conduct?

The Code of Conduct translates the BioGaia Way into clear expectations and standards for how we act – every day, with each other, our customers, partners, and communities. It reflects BioGaia's commitment to integrity, respect, and responsibility in everything we do and helps us make decisions that strengthen trust in our company.

The Code sets out the standards that everyone at BioGaia must follow and refers to related policies and guidelines for more detailed guidance on specific topics. When local laws set higher standards than this Code, follow the local laws. When this Code sets higher standards than local laws, follow this Code.

Who is Covered by This Code?

The Code applies to all employees and directors of the BioGaia Group, as well as temporary employees, consultants, and agents working on our behalf. We also expect all business partners, distributors, and suppliers to act consistently with the principles of this Code.

Acting with Integrity in Every Decision

The Board of BioGaia is ultimately responsible for this Code and, together with the Executive Management Team, ensures that it is communicated, implemented, and upheld across the organization.

Managers are expected to lead by example and guide their teams in applying its principles.

Every employee shares responsibility for reading, understanding, and following the Code and related policy documents – and for speaking up if something doesn't feel right or if our ethical standards are at risk.

Following BioGaia's Code of Conduct is part of how we live our values in practice. Each section of this Code includes "What if?" examples – potential real-life situations and questions to help guide your decisions and actions, along with references to policies and procedures that set mandatory requirements.



Good Judgement Starts with Asking the right Questions



When in doubt or faced with a difficult decision, ask yourself:

1.

Is it right?

Does it reflect BioGaia's values and the ethical standards we expect of each other?

2.

Is it legal?

Does this action comply with laws, regulations, and BioGaia's policies?

3.

How would it read in the news?

Would I be comfortable if this decision or action were reported publicly or shared with my colleagues, friends, or family?

If something doesn't feel right, or you hesitate before answering - pause and seek guidance. Talk to your manager, HR, or the Chief Legal Officer.



How to Report a Violation

We believe in maintaining a transparent and open environment where everyone feels comfortable speaking up about any concerns. If you suspect someone might not be following our Code of Conduct, or relevant laws, we encourage you to address it directly with your immediate manager. If for any reason that isn't possible, feel free to reach out to a higher-level manager. For most cases, it is typically best to address them directly with a manager in a face-to-face conversation.

If you feel uncomfortable doing this or if the issue remains unresolved, you can contact our Reporting Violations Team (Executive Vice President & Chief Legal Officer and Chief Human Resources Officer at BioGaia AB). It's important to us that every concern is taken seriously, and we are committed to acting on any information, regardless of who is involved.

For those who prefer to raise their concern anonymously, BioGaia has a Reporting Violations channel accessible through our company webpage. Rest assured that anyone who reports a concern will not face any retaliation or disadvantage for doing so, as long as they've acted in good faith. Even if it turns out to be a misunderstanding, your willingness to report is what truly matters.

You can access the reporting platform at: [Reporting Violations](#). For additional details on this process, please check our Reporting Violations Guideline.

Toolbox



[Reporting Violations Guideline](#)

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We Care For People and Human Rights

At BioGaia, our people are our greatest asset. The success of our organization depends on their wellbeing, engagement, and development. Empowered teams that share our values are key to achieving our goals and driving lasting impact.

We are equally committed to upholding human rights, equality, and fair treatment across our workplaces and supply chain, ensuring that everyone connected to BioGaia is treated with dignity and respect.

Prioritize Safety and Wellbeing

We all share responsibility for creating a safe, healthy, and supportive workplace

Our people are at the heart of who we are, and their wellbeing and safety are essential to everything we do. We are committed to providing a workplace that is safe, supportive, and sustainable, with fair terms and conditions for everyone.

Safety always comes first and is our shared responsibility. We regularly assess our workplace to minimize risks and ensure a healthy and secure environment. Stay alert to risks and report any hazards, incidents, or unsafe conditions immediately to your manager or health and safety personnel. Managers are expected to take reported concerns seriously, address them without delay, and ensure corrective actions are implemented.

We are also committed to supporting long-term physical and mental wellbeing. While some periods may require extra effort, workloads must remain manageable and sustainable. Employees are encouraged to communicate openly about any concerns, including stress, workload, or other factors that may affect their wellbeing, to maintain a caring, respectful, and collaborative work culture.

BioGaia complies with all applicable health and safety laws and continually seeks to improve workplace practices. A safe and healthy environment enables everyone to perform at their best and contributes to our shared success.

Promote Inclusion and Equal Opportunity

We respect every individual and foster a culture where everyone can thrive

BioGaia celebrates diversity in our workforce, encompassing a range of skills, abilities, backgrounds, cultures, and perspectives. We believe that a diverse and inclusive workplace is essential for a thriving, innovative, and sustainable business. Diversity enriches our organization – driving innovation, improving decision-making, and strengthening our connection to customers and communities.

We make all employment decisions based only on merit, qualifications, and performance. We ensure equal pay for equal work regardless of background.

Speak Up if You Witness Misconduct

We never ignore misconduct – raising concerns protects us all

BioGaia has zero tolerance for discrimination, harassment, bullying or abuse. This includes any behavior that targets individuals based on protected characteristics such as race, religion, gender, age, sexual orientation, disability, or any other status defined by law. Intimidation, violence, or abuse – physical, verbal, or digital – are never acceptable.

Every employee has the right to work in an environment free from harassment, intimidation, and mistreatment. We must all treat one another with respect, dignity, and common courtesy, contributing to a workplace where everyone feels safe and valued.

If you experience or witness inappropriate behavior, speak up. Report the concern to your manager, a higher-level manager, Human Resources, or through BioGaia's Reporting Violations Platform. All concerns will be taken seriously, handled confidentially, and investigated without fear of retaliation.

Uphold Human Rights

We respect human rights in everything we do, across our operations and value chain

BioGaia is committed to fair and responsible employment practices everywhere we operate. We follow all labor and employment laws and support international human rights standards, including the UN Universal Declaration of Human Rights and International Labour Organization Core Conventions. We do not tolerate or knowingly engage with anyone involved in human rights abuses, including child labor, forced labor, human trafficking, or physical punishment.

Our suppliers and partners are expected to share this commitment by ensuring fair wages, reasonable working hours, and safe conditions. We remain vigilant and assess potential risks through dialogue, audits, and collaboration across our value chain.

BioGaia also recognizes privacy as a fundamental human right. We are committed to protecting personal data in line with the General Data Protection Regulation (GDPR) and other applicable privacy laws.

Upholding human rights is everyone's responsibility. Stay alert to risks, follow local labor laws, and report any suspected violations through BioGaia's reporting channels.

Respect Freedom of Association

We support open dialogue and employees' right to organize and be heard

We recognize and respect the freedom of our employees to be a member of any employee organization of their own choosing. Where employees are represented by a legally recognized trade union, we engage in constructive dialogue and good-faith consultations with their representatives, in line with local laws and practices.



What if?

During a team meeting, someone made a joke about a colleague's accent. It made people uncomfortable, but no one said anything. Should I speak up?

Yes. Everyone has the right to be treated with respect and dignity. If you feel comfortable, address it calmly in the moment. If not, speak to your manager or HR. Even small comments can contribute to a non-inclusive environment, and raising the issue helps reinforce BioGaia's values.

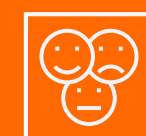
I've noticed that a colleague seems increasingly unwell – exhausted, complains about not getting enough sleep and feeling constantly overwhelmed. I'm worried the situation may be serious. What should I do?

At BioGaia, we all share responsibility for maintaining a healthy work environment. Encourage your colleague to speak with their manager or HR about their workload. If you're concerned it may affect safety or wellbeing, raise it directly with your manager.

My manager often loses their temper when deadlines are missed, speaking to people in a harsh and belittling way that makes the whole team uncomfortable. Is that considered harassment?

This behavior is not consistent with BioGaia's respectful workplace culture. While pressure can arise at work, losing one's temper, intimidating others, or speaking to colleagues in a demeaning or disrespectful manner is never acceptable. Regardless of intent, such conduct creates an unhealthy work environment. You can talk to your manager about how it affects the team, or, if that feels difficult, raise the issue with HR or report it through BioGaia's Reporting Violations Platform. All concerns are handled seriously and confidentially.

Toolbox



People Policy



Local Employee Handbook

What's expected of you?

- **Act with integrity and respect** – Treat colleagues, customers, and partners with dignity and professionalism, in every situation.
- **Lead by example** – Demonstrate BioGaia's values in your daily decisions and encourage others to do the same.
- **Promote wellbeing and inclusion** – Contribute to a safe, supportive, and diverse workplace where everyone can thrive.
- **Make sure we choose to work with responsible partners** – Ask suppliers how they uphold human rights standards, and report any suspected breaches or misconduct.
- **Follow the rules** – Comply with laws, regulations, and BioGaia's Code, policies, and procedures.
- **Speak up** – Raise concerns or suspected violations promptly and without fear of retaliation, using any of BioGaia's reporting channels.



We Understand Our Responsibility to Others

Every day, all around the world, we demonstrate our commitment to excellence by delivering safe and high-quality products to consumers. We are guided by our mission to be known as the most trusted probiotic brand in the world, grounded in science. We honor our commitment to our customers by caring deeply about Product quality and safety, as well as regulatory excellence. We ensure that our products, and the way we communicate about them, meet or exceed our internal standards and the standards set by laws, regulations, and our industry.

Preserve Product Quality and Safety

We never compromise on quality and safety standards

At BioGaia, product quality, safety, and efficacy are fundamental to who we are. Every product must be developed, manufactured, and distributed to meet the highest standards of safety, efficacy, sustainability, and traceability throughout its life cycle. You are expected to follow all relevant quality and safety procedures, report any deviations immediately, and always put consumer health first.

All BioGaia products must be well-documented for safety and efficacy through robust clinical studies and comply with all applicable laws, regulations, and internal quality standards. Quality is everyone's responsibility – from research and development to production, marketing and delivery. Maintaining it is essential to the trust our customers place in us.

Communicate Responsibly, Accurately and Transparently

We communicate with honesty, support claims with science, and prioritize transparency

All communication about BioGaia's products must be truthful, balanced, and supported by scientific evidence. You are expected to ensure that any health or product claims are accurate, clearly distinguishable, and based on results from well-designed clinical trials. All claims must comply with applicable laws, regulations, and internal policies.

Research integrity and transparency are essential to our credibility. Ethical standards apply to all preclinical and clinical research in which BioGaia is involved. Every study must have local ethical approval and comply with the Helsinki Declaration principles for medical research.

Whenever possible, BioGaia seeks to make clinical study results publicly available, regardless of outcome, to contribute to scientific progress and support informed decisions. Research involving animals must be scientifically justified and ethically conducted only carried out after replacement, reduction, and refinement have been considered.

Keep private information private

Trust is paramount to our brand – individuals rely on us to safeguard their personal data

We protect the privacy of consumers, customers, coworkers and business contacts. We handle their personal data with care. Personal data means any information that could identify a person, such as names, employee IDs, email addresses or phone numbers. We follow data privacy laws like GDPR in all our operations.

Follow our policies and protect personal data by (a) using it only for its intended purpose, (b) collecting only the minimum data needed, (c) sharing it only when authorized and according to our policies, and (d) contacting our Legal Department when in doubt.

Individuals have rights to access, correct, delete, or restrict the use of their personal data. If you receive a request from someone regarding their personal data, promptly forward it to the Legal Department for proper handling

Practice good cybersecurity, too. Make sure you follow the processes and practices we have in place to protect our networks, computers, programs and data from attack, damage or unauthorized access.

Uphold Integrity in All External Relationships

We work responsibly with suppliers, business partners, and public authorities

Our commitment to responsible sourcing is fundamental to who we are. Therefore, we choose partners based on mutual respect and trust, considering quality, service, price, availability, reliability and sustainability criteria. We ask our suppliers to commit to BioGaia's high standards, ensuring they operate ethically and in compliance with our Code, policies, and values, as outlined in our Supplier Code of Conduct.

In all dealings, including those with government entities, we adhere to ethical standards and transparency.

When government officials contact us for inspections, investigations, or information, we always respond truthfully. Never mislead officials or alter documents. If a government official contacts you, always respond and direct them to the Corporate Governance Department.



What if?

The UK Medicines and Healthcare products Regulatory Agency (MHRA) inquiries about claims made regarding our products.

Promptly react to any official communication from the MHRA, as timely responses are crucial for compliance. Liaise immediately with the Corporate Governance department at BioGaia AB and local counsel, if applicable, for guidance in addressing the inquiries. Ensure that all information provided to the authorities is accurate and compliant with regulations. By cooperating effectively, you help uphold our commitment to integrity and regulatory compliance.

I heard that one of our suppliers may be using temporary workers in poor conditions. What is my responsibility?

If you become aware of possible human rights or labor concerns in our supply chain, you must report it to your manager, the Procurement team, or the Sustainability Director. BioGaia takes such issues seriously and will assess the situation through dialogue and, if needed, audits. Speaking up helps ensure our partners meet the ethical standards in our Supplier Code of Conduct.

A colleague asked me to share some unpublished study results for a presentation. It's internal, so is it okay?

Not without proper approval. All study data – especially clinical results – must be reviewed and approved before sharing, even internally. This ensures that the information is accurate, balanced, and aligned with our transparency and compliance standards.

Toolbox



Quality Policy



Communication Policy



Business Partner Code of Conduct



Supplier Code of Conduct



Data Privacy Policy

What's expected of you?

- **Protect product quality and safety** – Follow all applicable procedures, report deviations immediately, and never compromise on product quality, safety, or efficacy.
- **Communicate with integrity** – Ensure all product claims and materials are accurate, evidence-based, and compliant with laws and internal policies.
- **Handle data responsibly** – Protect personal and confidential information, use it only for legitimate business purposes, and follow cybersecurity and privacy requirements.
- **Hold suppliers to our standards** – Follow our procurement guidelines, including due diligence, choose and collaborate with suppliers who uphold BioGaia's Code, and report any suspected violations of human rights, ethics, or compliance standards.
- **Monitor carefully our contractual agreements** – Make sure the suppliers are meeting their obligations and we're meeting ours.
- **Cooperate transparently with authorities** – Respond truthfully and promptly to government inquiries or inspections, and direct officials to the Corporate Governance Department.

We Do the Right Thing

Every decision we make reflects BioGaia's integrity. Acting responsibly is not just about following rules - it's about doing what's right, even when no one is watching. Our relationships with customers, partners, healthcare professionals, and regulators are built on honesty, respect, and transparency.

We expect everyone representing BioGaia to uphold these standards – avoiding improper payments, treating competitors with respect, protecting company information, and maintaining accuracy in every interaction. By doing so, we protect our reputation, strengthen stakeholder trust, and uphold our license to operate.



BioGaia
Academy



Never Bribe

We act with integrity – bribery or improper payments has no place at BioGaia

Always work with honesty and integrity—never offer or accept bribes and ensure that others do not do so on our behalf. We hold responsibility not just for our actions, but also for those of any third parties representing us.

Remember, bribery isn't limited to payments; gifts, favors, or job offers can also be considered bribes if given in exchange for a decision. Before providing anything of value, consult our policies to understand what is acceptable. Bribery, in any form, or improper payments is always unacceptable.

Maintain Sound Interactions with Healthcare Professionals

We collaborate with healthcare professionals responsibly, transparently, and lawfully

When working with healthcare professionals, we follow the highest ethical standards and all relevant laws. We only engage them when there is a legitimate business need and never pay more than fair market value for services. We maintain transparency and independence in all interactions.

Know the Rules About Gifts and Entertainment

We give and receive only what is appropriate, transparent, and never meant to influence

We do not give or accept inappropriate gifts or entertainment. While occasional gifts or invitations may be normal in business, they can sometimes be inappropriate, especially if they create an obligation or affect your professional judgment.

That's why we have guidelines to clarify acceptable circumstances. Always adhere to these rules and note any specific restrictions, such as the complications of giving gifts to government officials. If you're ever unsure about the right course of action, consult the Corporate Governance Department for guidance.

Compete Fairly

We win through innovation and quality, never through unfair advantage

We must always compete fairly, but vigorously, and we must never use deception or misrepresentation or abuse confidential information to gain an unfair advantage over our competitors. When you talk with customers, provide only truthful information about the quality, features and availability of our products, and don't make disparaging remarks about our competitors.

Competition laws are complex and vary by location. Work closely with the Legal Department to ensure we avoid anti-competitive activities, such as price-fixing agreements with partners.

Don't Trade on Inside Information

We handle sensitive information responsibly and never use it for personal gain

We welcome employees and directors to trade BioGaia shares. However, trading on material, non-public information is unfair and illegal. As BioGaia employees and directors, we may access information that could influence stock prices. This makes us "insiders," and trading on such information is prohibited.

Be aware of what constitutes inside information, including nonpublic details about mergers or acquisitions, sales or earnings results, financial forecasts, executive management changes, and pending lawsuits or significant events.

Do Not Trade during the Blackout period: All employees must be particularly observant and refrain from trading in our share during a 30-day period prior to the publication of a financial report.

Do Not Tip Off Anyone Else: Advising or allowing someone else to use inside information (known as "tipping") is strictly prohibited.

Keep Accurate Records

We keep honest, complete, and accurate records – because integrity starts with facts

Maintaining integrity in our recordkeeping builds trust with investors, business partners and ultimately consumers. Our long-term success relies heavily on effective business management, which is supported by accurate records. These records not only help us meet financial obligations and compensate employees but also illustrate our financial health. They hold us accountable to shareholders and inform our strategic decisions.

Adhere to internal controls when recording and managing our books. Be honest and thorough in all transactions and stay vigilant for any suspicious financial activities.

Follow Import, Export and Trade Compliance Rules

We follow all global trade laws to protect our business and uphold our reputation

If you are involved in the movement of products, services, information, or technology across international borders, ensure you understand and comply with trade compliance requirements.

Carefully evaluate business opportunities in countries subject to trade embargoes or economic sanctions, as well as the transfer of technology, such as bringing laptops or other devices into these areas.

Adhering to trade compliance laws is essential to protect our brand and preserve our relationships in the global marketplace.

What if?

A professor at a public hospital asks to receive payment for clinical study advisory services to his private account due to hospital bureaucracy. What should I do?

Payments to healthcare professionals at public institutions must as a rule go through their employer, not to private accounts. This protects transparency and ensures legal compliance. Contact the Legal Department before taking any action.

I overhear colleagues discussing major clinical study results and I'm unsure if it's inside information. What should I do?

Treat it as potential inside information. Sharing or discussing such information, especially informally, may violate the Market Abuse Regulation. As BioGaia is obliged to publish any such information according to strict rules. Report the situation immediately to your manager or the Legal Department. If classified as insider information, it must be publicly disclosed so all shareholders have equal access.

I meet a friend who works for a competitor and she asks how business is going. What should I do?

Keep the conversation general and avoid any sensitive or confidential details. Even informal discussions with competitors can create compliance concerns. Stick to high-level or neutral topics, such as overall industry trends. When meeting competitors in a business context, contact the Legal Department so ensure you have the right disclaimers.

Toolbox



Anti-Bribery and Corruption Policy



Financial Policy



Insider Trading Policy



Procurement Policy

What's expected of you?

- **Act with honesty and integrity** – Never offer, accept, or authorize bribes or improper payments, and make sure third parties acting on BioGaia's behalf do the same.
- **Engage responsibly with healthcare professionals** – Work only with legitimate business needs, pay fair market value for services, and maintain full transparency in all interactions.
- **Follow the rules on gifts and entertainment** – Accept or offer only modest and appropriate gifts or hospitality that do not influence business decisions or create conflicts of interest.
- **Compete fairly** – Win business through quality and trust, never through deception, misrepresentation, or the misuse of confidential information.
- **Protect company information** – Never share or use non-public information for personal or financial gain, and comply with insider trading rules.
- **Keep accurate and transparent records** – Record all business transactions truthfully and completely, following internal controls and reporting any irregularities.
- **Comply with trade laws** – Understand and follow all import, export, and sanctions regulations when moving products, services, or technology across borders.



We Safeguard Our Assets

The trust placed in BioGaia is built on how we protect what matters: our people, our science, and our planet. Every employee plays a role in ensuring that company assets, from confidential information to materials and equipment, are used responsibly and safeguarded against misuse.

We also recognize that our actions today shape tomorrow. By acting with integrity, managing conflicts of interest transparently, communicating responsibly, and being mindful of the environmental impact of our decisions, we help create lasting value for future generations.

Protect BioGaia's assets

We are committed to responsibly managing BioGaia's physical, electronic, and informational assets.

Our assets encompass everything the company owns or uses for conducting business. Each employee is responsible for safeguarding these resources against loss, damage, theft, waste, and misuse. Physical and electronic assets are provided to facilitate your work. While limited personal use of phones, computers, email, and the Internet is permissible, ensure that it doesn't disrupt your work or violate our policies or applicable laws.

Remember that any content you create, send, download, or store on BioGaia systems is considered company property, and your usage may be accessed; therefore, personal privacy expectations are limited.

Information is a vital asset as well. Confidential information and intellectual property result from significant investment and effort. This includes trade secrets, patents, copyrights, trademarks, business strategies, databases, business partner and customer information. By protecting these assets, you contribute to maintaining our competitive edge.

Avoid conflicts of interests

We make decisions that put BioGaia's best interests first

A conflict of interest occurs when a BioGaia employee's loyalties or actions are divided between the interests of BioGaia and those of another party, such as a competitor, supplier, or customer. Every decision and financial commitment must align with the goals and objectives of BioGaia.

You may engage in legitimate activities outside work, provided they don't conflict with BioGaia's interests. Various situations can create conflicts of interest, and some may not be immediately obvious. We can't list every possible conflict, but recognizing potential conflicts helps you avoid them. Many conflicts can be resolved simply - that's why declaring them is so important.

Don't speak on behalf of BioGaia

We ensure consistent, accurate communication by leaving public statements to authorized voices

At BioGaia, we are committed to ensuring that all information about our company is consistent, accurate, and complete. The words we choose carry significant weight and can impact our reputation profoundly.

To maintain clarity and protect our brand, only designated individuals are authorized to speak on behalf of BioGaia. If you are not one of these spokespersons, please refrain from making public statements regarding our company. This ensures that our messaging remains clear and unified.

Act with future generations in mind

We take responsibility for our environmental impact – building health for people and planet

Caring for the planet is part of caring for people, a principle that has guided our work since BioGaia was founded. We are committed to reducing our environmental footprint and integrating sustainability across our business.

We work continuously to improve the environmental performance of our operations and products - from design and sourcing to production, packaging, and distribution. Together with our suppliers and partners, we promote responsible practices and lower-impact materials across the value chain. By doing so, we help consumers make more sustainable choices: offering products that support health, respect the planet, and strengthen our vision to be the most trusted probiotic brand in the world.

Everyone at BioGaia is expected to consider environmental impact in daily work, use resources efficiently, and find ways to reduce waste, energy use, and emissions. Our collective success depends on responsible choices - made together with colleagues, customers, and partners. By acting with care and foresight, we contribute to a healthier planet and wellbeing for future generations.

What if?

I've been approached to sit on the Board of another company. Do I need to ask for permission?

Yes. You must inform your manager and seek permission before accepting the position. Board roles can create conflicts, so we need to assess the company, its services, and any potential impact on your responsibilities at BioGaia. Additionally, local regulations may require this side activity to be included in your employment contract. Joining a board of a non-profit or charitable organization generally does not require approval, provided it does not significantly affect your work at BioGaia.

A journalist contacts me on LinkedIn asking for a comment about BioGaia's sustainability work. Can I respond?

No. Only designated spokespersons may comment publicly on behalf of BioGaia. Politely direct the inquiry to the Director of Communication, Sustainability Director or Corporate Governance team. This ensures our external messaging remains consistent, accurate, and aligned with company policies.

I'm booking travel for a short internal meeting. It could be done online, but I prefer meeting in person. Is that acceptable?

Consider whether the travel adds enough value to justify the environmental impact, time, and cost. Whenever possible, choose virtual meetings to reduce emissions and use company resources responsibly. If travel is necessary, factor into your decision the most climate responsible option, such as taking the train when feasible, and plan efficiently by combining multiple meetings or site visits in one trip. This helps reduce both travel frequency and environmental footprint.

Toolbox



Conflict of Interest Policy



Environmental and Climate Policy



Communication Policy



IT Security Policy

What's expected of you?

- **Protect BioGaia's assets** – Use company property, equipment, and systems responsibly. Prevent loss, damage, or misuse, and report any incidents or suspected theft immediately.
- **Safeguard information** – Handle confidential and proprietary information with care. Do not share it outside the company or use it for personal purposes.
- **Avoid conflicts of interest** – Make decisions in BioGaia's best interest and disclose any personal, financial, or external relationships that could influence your judgment.
- **Communicate responsibly** – Only authorized representatives may speak publicly on behalf of BioGaia. Ensure all information shared is accurate, consistent, and professional.
- **Act with environmental awareness** – Use resources efficiently, minimize waste, and consider the environmental impact of travel, and daily work decisions.



The standards and supporting policies outlined in this Code of Conduct may be updated from time to time. Everyone working for BioGaia are expected to stay informed and follow the current laws, regulations, and company policies that guide our work.

The latest version of BioGaia's Code of Conduct, along with supporting policies and reporting channels, can always be found on the company intranet and on www.biogaiaigroup.com.

Thank you for living our values and helping us build trust - every day.

*Board of Directors
December 2025*

BioGaia Group Code of Conduct

Contact
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BioGaia®