



Astro Pharma
Code of Conduct
2025

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FOREWORD BY THE MANAGEMENT



Dear colleagues,

You are an important part of Astro Pharma. Every decision you make and every action you take affects our company. It is therefore important to us to make you aware of the ethical, moral and legal requirements that form the basis of our business behaviour so that we can jointly manage our company in line with these values. We have summarised the relevant requirements in this Code of Conduct.

In addition to all other relevant regulations, we ask that you observe this Code of Conduct and be guided by its contents.

Our Code of Conduct will help us continue to be recognised as a company that is respectful, considerate and responsible.

Thank you very much for your support!

The company founders

Sabine Möritz-Kaisergruber & Helmut Kaisergruber

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1. INTRODUCTION

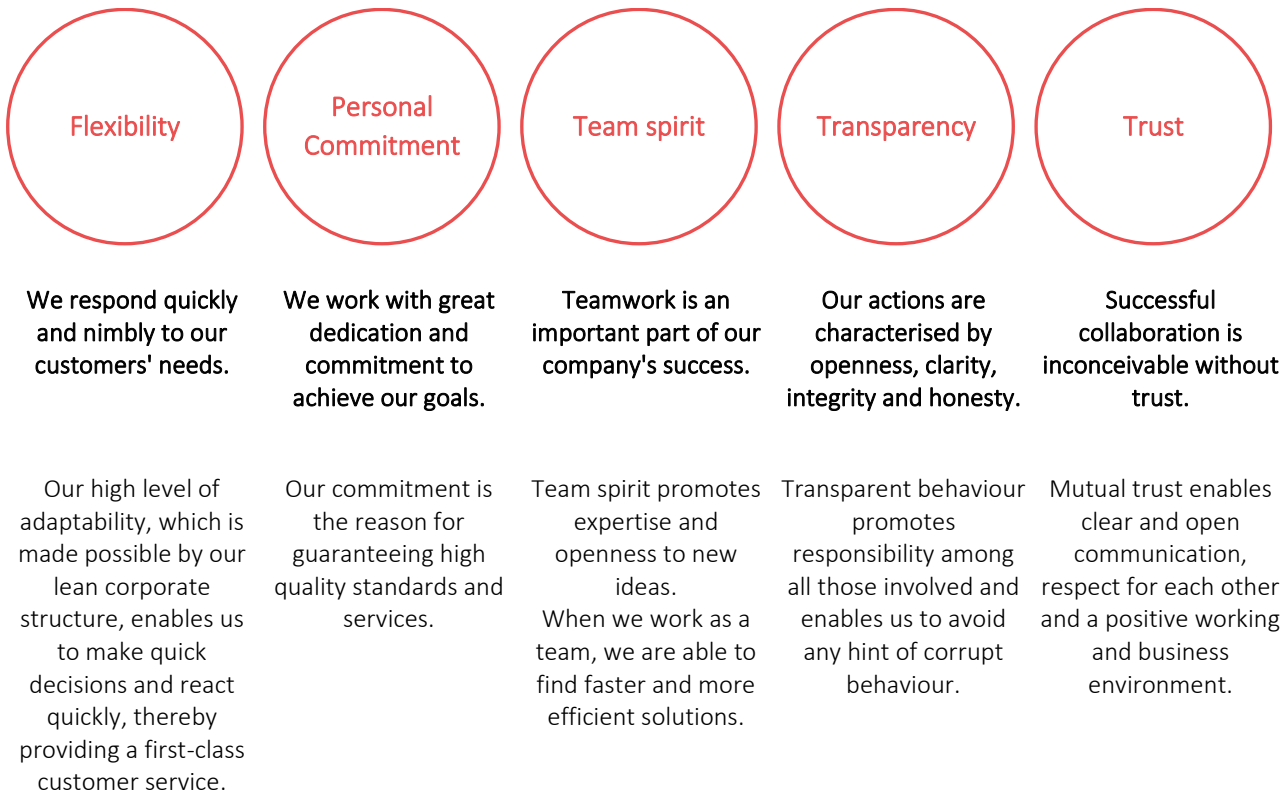
1.1. Who we are

Astro Pharma is a family-run pharmaceutical company. We employ 46 people and distribute our own medicines as well as medicines from international partner companies.

1.2. Our corporate goals

Our goal is to respond quickly and flexibly to the needs of our customers with our products and services. We want to supply the market with essential and affordable medicines and niche products that are essential for the healthcare system of the future and secure it in the long term. This also includes medicines that are economically unattractive for other companies. If we are made aware that certain medicines are not available on the market, we do everything we can to make these medicines available. Our customers' wishes are our top priority.

1.3. Our corporate values



1.4. Code of Conduct of Astro Pharma

Astro Pharma adheres to the highest standards required of a distribution company in the pharmaceutical market and which are derived from the public's expectations of the behaviour of a professional pharmaceutical company. We make every effort to ensure that our business partners and employees comply with all applicable regulations and share our high moral and ethical standards of quality and behaviour.

This Code of Conduct is intended to reflect our standards and values and support our employees in complying with them. It describes the policies and beliefs on which our company is built and provides the framework for our legally correct behaviour and the values we believe in and act upon.

As a founding member of the Austrian Biosimilars Association (BiVÖ), Astro Pharma is subject to the association rules of Medicines for Europe, the European association for generics and biosimilar suppliers, which also reinforce and guide us in our standards and values.

1.5. Area of application and use

The Code of Conduct is aimed at all Astro Pharma employees. Each section of the Code of Conduct consists of three parts: *Our principles, How do we do the right thing and What actions do we take?*

1.6. Compliance with the rules

The management and the respective department heads are responsible for ensuring that the guidelines of the Code of Conduct are understood and implemented. Regardless of hierarchical level or employment status, every employee is obliged to observe and comply with the Code of Conduct.

Violations of the Code of Conduct, other internal company guidelines or statutory provisions may have consequences under labour law. In addition, such violations can also have consequences under criminal and civil law for those affected.

1.7. Contact

If you have any questions, feedback or recommendations, you can contact the management or your department head at any time.

2. LOBBYING AND PUBLIC AFFAIRS



2.1. Our principles

Our company deals with economic policy issues and matters relating to our corporate objectives in compliance with all applicable regulations without exception. These include, in particular, the Austrian Medicinal Products Act (AMG) and the General Social Insurance Act (ASVG).

As a matter of principle, we are politically neutral and do not support political parties or individuals either materially or financially.

As a member of the BiVÖ, Astro Pharma is committed to fair competitive conditions in the pharmaceutical biosimilars industry. BiVÖ is a voluntary organisation representing the interests of Austrian biosimilars suppliers and plays an active role in shaping and exchanging opinions with political and other initiatives affecting the biosimilars market.

2.2. How do we act correctly?

- Corruption: Lobbying is never misused for corrupt or illegal purposes, and we do not exert any undue influence.
- No encouragement to break the rules: We do not encourage anyone to violate applicable rules or standards of behaviour in our own interests or the interests of third parties.
- Fairness, transparency and integrity: Any lobbying work is characterised by fairness, transparency and integrity. We ensure that all published information corresponds to the current state of knowledge, is factual and not misleading. We disclose the company's business interests to the extent required by law.

2.3. What measures do we take?

- Training for employees: We provide training and awareness-raising activities to ensure that our employees carry out their work correctly and within the law.
- Transparency: All material activities are documented. Disclosure is made where required by law.



3. FAIR COMPETITION



3.1. Our principles

Astro Pharma is convinced that free, fair and efficient competition that complies with legal regulations, in particular competition law, is of great importance. Astro Pharma does not enter into any agreements that interfere with market activities in a legally unauthorised manner or promote conflicts of interest.

3.2. How do we act correctly?

- Price and bid rigging: We have no influence on offer conditions, price setting, tenders, or applications.
- Collective boycotts: We have no agreements with competitors and do not influence which customers are not supplied or from which suppliers purchases are not made.
- Market share: We do not participate in reserving or distributing sales territories, customers, or product lines.
- Monopolization and dominance in the market: Our market presence is not geared toward abusing our market share to the detriment of competitors.
- Exchange of information: We do not disclose sensitive information to competitors without a legal basis. We do not participate in any illegal communication exchanges. We urge third parties to keep sensitive information confidential.
- Business agreements with suppliers and customers: We only set resale prices to the extent permitted by law.

3.3. What measures are we taking?

- Training courses for employees: We offer our employees training courses, professional education and training to ensure fair competitive behavior.
- Contracts: To prevent misconduct, we urge our business partners and third parties to observe all legal requirements.
- Standard Operating Procedures (SOPs): With regard to our quality management, SOPs are in place to ensure consistent and correct processes, which stipulate binding internal company guidelines for various processes.

4. NO CORRUPTION AND BRIBERY



4.1. Our principles

Protecting the integrity of our company is one of our top priorities. Not only does corruption and bribery impact our company's reputation, it can also have a negative effect on the reputation of our customers and partners.

Such behaviour has no place in our company as it contradicts our ethical and moral standards. We conduct all business with the utmost integrity, and we expect our business partners to do the same. Granting, promising, offering, demanding or accepting bribes in any form is expressly forbidden.

We support doctors, other members of the medical profession, specialist institutions and patient organisations exclusively within the legally permissible framework. We do not offer or promise bonuses or other financial or material benefits, unless these are of low value and relevant to medical or pharmaceutical practice. Reasonable travel and accommodation expenses, participation fees, and other representation expenses may be covered for professional scientific events.

With regard to sales promotion events, representation expenses must be strictly limited to the main purpose of the event and can only apply to individuals authorised to prescribe or dispense.

When supporting scientific training events, we do not issue direct instructions to organisers or exert direct influence over them. Our support contributions are in no way connected with services already provided or intended to be provided by Astro Pharma to the respective organisers. Our support contributions do not influence procurement channels or pricing, nor do we have any expectations in this regard.

4.2. How do we act correctly?

- Advertising material:
 - > We only supply advertising materials to persons who are authorised to prescribe or dispense medicinal products.
 - > As advertising material, we only provide items for everyday use with a low commercial and market value that are exclusively relevant to the needs of medical or pharmaceutical practice and do not offer any purely personal benefit to the addressees.
- Support of scientific training events:
 - > We exclusively provide support for the organisation of scientific training events attended by individuals who are duly authorised to prescribe or dispense medicinal products.
 - > Financial support is provided exclusively for the organisation of scientific training events and not to finance any supporting programmes or the participation of accompanying persons.
 - > Our support services and the advertising opportunities granted in return for our company are proportionate.
 - > The scope and type of financial support are documented precisely and comprehensibly.
- Support for participation in scientific training events:
 - > We will only pay reasonable travel and accommodation expenses, participation fees and other representation expenses in connection with professional scientific events and exclusively for persons who are authorised to prescribe or dispense medicinal products.
 - > The assumption of travel and accommodation costs, participation fees and other representation expenses is strictly limited to the main scientific purpose of the respective event.
 - > No support or funding is provided for any supporting programmes for scientific training events.
 - > No costs will be covered for third parties.
 - > Pure marketing events are not supported.
 - > Every cost transfer must be documented precisely and comprehensibly.
 - > Offers of support for participation in professional scientific training events are to be addressed exclusively to the management of the specialist medical institution itself, which can nominate suitable participants.
 - > We pay attention to any existing authorisation requirements for participation in job-related scientific training events by the employers of the respective participants.
- Entertainment expenses:
 - > Hospitality to persons who are authorised to prescribe or dispense medicinal products is only permitted in exceptional cases to maintain business relationships and on special occasions. They are not permitted to initiate business.
 - > Exceptionally permissible hospitality to persons authorised to prescribe or dispense medicines is accepted in reasonable amounts, very irregularly and exclusively in the vicinity of the place of work of the person concerned.

- > We document every hospitality event precisely and comprehensibly. We prepare notes on the content of the discussions and file the invoices.
- > We generally avoid entertainment programmes and do not cover any associated accommodation or hospitality costs.
- Donations:
 - > We donate in an altruistic, voluntary and independent manner, and not as a result of sales transactions.
 - > We document the purpose, amount and recipients of donations in detail.
- Submission of samples:
 - > The distribution of medical samples is carried out in compliance with all applicable legal requirements.
 - > Every dispensing of medical samples is documented in a binding and precise manner.
- Consultancy and other services:
 - > We only accept consultancy and other services from doctors and other healthcare professionals in connection with their medical activities.
 - > We pay consulting and other services provided by doctors and other healthcare professionals appropriately on the basis of time and effort, while also taking into account their qualifications and reputation.
 - > We document counselling and other services provided by doctors and other healthcare professionals and bill them in a transparent manner.
- Reporting of misconduct: We report possible misconduct to the management.
- Documentation and accounting: We maintain proper documentation and accounting and expect the same from our business partners.
- Invoicing and payment:
 - > We issue proper invoices and only pay invoices that have been issued by our business partners in accordance with legal requirements.
 - > Before paying the invoices of our business partners, an appropriate invoice check is carried out.
 - > We do not make payments in cash and do not accept payments in cash.
- Contact: If you have any questions, please contact your line manager.

4.3. What measures do we take?

- Training for employees: Astro Pharma employees receive regular training on the topics of corruption and bribery. In particular, there are regular training sessions on advertising materials and support for scientific training.
- Training and development opportunities: We support our employees with meaningful training and development opportunities.
- Contracts: We conclude contracts and encourage our business partners to comply with these contracts and other legal regulations.
- Disclosure obligation: Astro Pharma discloses all non-cash benefits and donations to doctors and other healthcare professionals, medical institutions and patient organisations.
- Accounting and documentation: Astro Pharma is legally obliged to maintain proper documentation and accounting.

5. EQUAL TREATMENT AND ANTI-DISCRIMINATION



5.1. Our principles

Astro Pharma is convinced that productive cooperation is only possible on the basis of equal opportunities. We therefore do not tolerate discrimination, favouritism, harassment or exclusion on the basis of religion, gender, ethnic origin, ideology, age, sexual orientation or disability. Our cooperation is characterised by collegial respect, integrity and fairness. We comply with the provisions of the Equal Treatment Act and other applicable regulations.

Our company prides itself on its flexibility and adaptability. In this context, the interdisciplinary knowledge of our employees is particularly important and is supported at all times. Each individual is given the opportunity to develop the competences and skills necessary to achieve the expected results and outcomes. Achievements are equally valued and recognised. We also value and encourage the diversity of our employees, which can help to further strengthen innovation and knowledge sharing.

5.2. How do we act correctly?

- Treatment of people: We treat others as we would like to be treated ourselves.
- Work environment: We support each other in all decisions and create an inclusive and positive working atmosphere.
- Ready for improvements: We are open to criticism and are also happy to offer productive feedback.
- Unbiased: We respect differences of opinion and are open to different ideas.
- Personal development: We actively participate in the development of our professional skills and competences.
- Role of line managers: Our supervisors and managers regularly take part in further training and ensure that our employees feel comfortable and can talk openly about complaints or difficulties.
- Reporting misconduct: If we have reasonable grounds to suspect that colleagues or other persons acting on behalf of Astro Pharma have violated or may violate legal regulations or have acted or may act in an unethical manner, we are obliged to report this information immediately to our respective superiors. If it is unclear whether misconduct has actually occurred, we will clarify the matter as quickly as possible.
- Transparency between those involved: In order to minimize misinterpretations of behavior and enable objective and traceable treatment, all aspects of a potential conflict of interest are discussed openly with the respective superiors and the persons involved.

5.3. What measures are we taking?

- Joint activities: The aim of joint activities is to further strengthen trust between all employees and to promote and safeguard diversity in our company.
- Training and development opportunities: Opportunities for further training and other development opportunities are offered to all employees to the same extent.

6. HEALTH AND SAFETY AT THE WORKPLACE



6.1. Our principles

At Astro Pharma, we prioritise the health and well-being of our employees. We are committed to maintaining a safe and supportive work environment, promoting physical and mental health, and minimising work stress. We also attach great importance to a collegial and social working environment. We are committed to ensuring that our employees can perform their work in a pleasant environment. To this end, we provide them with a healthy and safe working environment that also benefits our business partners and visitors.

We are committed to providing a healthy and safe working environment that complies with all applicable legal requirements, including the Employee Protection Act (ASchG) and the Working Hours Act (AZG). Furthermore, we are committed to providing optimal working conditions for our employees, and we value their cooperation in this regard. On the one hand, they are obliged to comply with all applicable legal requirements and internal guidelines; on the other hand, they contribute independently to the continuous improvement of a healthy and safe working environment.

Since the coronavirus pandemic, our office staff have been so well equipped in terms of work technology that they can work from home at any time.

Of course, we also want our field staff to benefit from our employee-friendly approach. We endeavour to give them as much say as possible when it comes to cars and ensure that they meet high safety and ergonomic standards.

We offer every assistance to make it easier for our field staff to work in their home offices. We provide mobile phones, laptops, e-ink tablets and printers and make sure that all devices meet the needs of our employees and provide them with the best possible support in their daily work.

6.2. How do we act correctly?

- Working hours: We adhere to the agreed standard working hours. Overtime is only worked on the instructions of superiors within the framework of the legal requirements.
- Rest breaks: We make sure that a rest break of at least half an hour is taken if the total duration of working hours in one day is more than 6 working hours.
- Well-being: We look after each other's health and safety. As line managers, we are responsible for the well-being of our employees and ensure a pleasant and open working atmosphere.
- Tidy workplace: We keep our workplace clean and tidy.
- Safety officer: We report health and safety hazards in the workplace to our safety officer, Gabriele Pieslinger-Huber, who is in contact with safety officers and occupational physicians. We can reach her at: gabriele.pieslinger-huber@astropharma.at
- First aid: For immediate help with injuries on site, we turn to our first aider Regina Steiner: regina.steiner@astropharma.at and Patric Hofer: patric.hofer@astropharma.at
- Opportunities for improvement: We point out opportunities for improvement in ensuring health and safety in the company and draw colleagues' attention to negligent behavior.

6.3. What measures are we taking?

- Training for employees: Training and awareness-raising activities are organized annually to keep all employees informed about health and safety in the workplace.
- Internal support: We have appointed a safety officer and two first aiders.
- External advice: External safety officers and occupational physicians support and review our existing measures to ensure health and safety in the workplace.
- Workplace equipment:
 - > External assessors inspect our VDU and computer workstations together with our safety officer every year to ensure they are set up correctly.
 - > We help employees who need special support in setting up their workstation for ergonomic or other health reasons. For example, offices can be equipped with height-adjustable desks, special office chairs, additional monitors and footrests on request.
 - > This also applies to employees working in the field when furnishing their office. They also receive support for their daily work in the field, such as trolleys, to make it easier to transport their work documents. For congresses where a larger stand needs to be set up, a stand construction company is hired to relieve the burden on employees.

- > The car, as the 'workplace' of the sales force, must also be set up according to ergonomic and safety requirements.
- Recording working hours: With the exception of executive employees, we record working hours to ensure compliance with the prescribed working and rest times.
- Promoting health and social well-being: To promote a healthy and collegial working atmosphere, we regularly organize joint activities for everyone and provide our employees with various support services.
 - > We take part in sporting events (e.g. Vienna Business Run), organize joint hikes and provide an "Astro Pharma" e-bike for general use.
 - > We provide meal vouchers every working day and fresh fruit and vegetables every week.
 - > On request, our employees can receive an annual public transport pass.
 - > We offer all employees various free vaccinations every year. If you have any questions about the current vaccination program, please contact Gabriele Pieslinger-Huber: gabriele.pieslinger-huber@astropharma.at
 - > Since Corona, we have been providing free tests and masks and ensuring that all legal requirements are strictly adhered to where necessary and that everything possible is done to ensure a safe and pleasant working environment.
- Situational measures: In special situations, additional measures are taken to ensure the health and safety of all employees, such as specific special training and additional health precautions, always taking into account a continuous exchange of information.

7. DRUG SAFETY



7.1. Our principles

At Astro Pharma, we prioritise the supply and sale of safe and effective medicinal products, as our primary commitment to our customers is to offer high-quality products.

We comply with all provisions of Austrian and EU law, in particular the AMG and the EU Community Code relating to medicinal products for human use, as well as other legal requirements. We work according to the principles of Good Distribution Practice (GDP) and Good Pharmacovigilance Practice (GVP) and also expect our business partners to comply with the legal requirements applicable to them.

Astro Pharma has an experienced and competent regulatory, pharmacovigilance and quality assurance team that deals with all issues arising in connection with drug authorisation, complaints or side effects. In addition, our employees and business partners are responsible for ensuring that existing quality standards are met and that the necessary measures are taken to enable the provision of safe and high-quality medicinal products.

7.2. How do we act correctly?

- Obligation to report: All side effects, complaints, medical inquiries or quality-related complaints concerning our products will be reported by us within 24 hours, or the next working day in the case of weekends or public holidays, to the e-mail address: quality@astropharma.at
- Up-to-date: We ensure that the necessary information for doctors, pharmacists and patients is always up to date.
- Company management: Our management team provides all resources and ensures the necessary conditions to continuously improve quality targets and standards.

7.3. What measures are we taking?

- Contracts: We conclude written contracts with our business partners.
- Quality assurance: We have a quality management system in place to identify and deal with product risks and to comply with legal and regulatory requirements.
- Pharmacovigilance: Our Qualified Person Responsible for Pharmacovigilance (QPPV) monitors the safety of the pharmaceutical products we market and ensures that existing standards are adhered to and risks are minimized as far as possible.
- Training for employees: We hold regular training courses on quality assurance and pharmacovigilance for our employees, the content and understanding of which is tested in writing.
- SOPs: To ensure consistent and correct processes, we issue corresponding guidelines in SOPs.
- Careful selection: We only select reliable and trustworthy business partners.
- Qualification and auditing: We ensure the reliability of our business partners and trustworthy cooperation with them through qualification and auditing.

8. DATA PROTECTION



8.1. Our principles

As part of our business operations, we may inevitably come across the personal data of our employees, business partners and other individuals.

Personal data is defined as any information relating to an identified or identifiable natural person. An identifiable natural person is defined as an individual who can be identified, either directly or indirectly, by reference to a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (see Section 4.1 of the General Data Protection Regulation).

We are aware that personal data is subject to special protection and that its use is only permitted under specific conditions. It is imperative that this data be treated with absolute confidentiality and in accordance with the provisions of Austrian and European data protection law.

Only necessary personal data may be processed, and its storage is only permitted if this data is necessary for the processing. Personal data must be processed exclusively for agreed purposes and always in a lawful, comprehensible and transparent manner. Personal data must be kept accurate and up to date to the best of our knowledge and belief and its security and protection must be guaranteed to the maximum extent possible. Compliance with data protection in the company must be demonstrated at all times.

8.2. How do we act correctly?

- Procurement and processing: We do not procure or process any personal data without authorization.
- Disclosure: We do not transfer any personal data to unauthorized recipients inside or outside the company and do not make this data accessible to anyone else without authorization. We only transfer personal data that is entrusted to us or made accessible to us in the course of our professional employment on the express instructions of our respective superiors.
- Use for a specific purpose: We do not use personal data for any purpose other than the legitimate performance of tasks within the scope of our employment relationship.
- Consent and revocation: We ensure that the person involved has consented to the processing of their personal data and that they are informed about the purpose of the processing and the possibility of revoking their consent.
- Retention: We delete personal data after the purpose of use or the statutory period has expired.
- Security: We store personal data in a secure and protected manner.
- Reporting obligation: We report data protection incidents to the responsible supervisory authority without delay, if possible within 72 hours of becoming aware of them.
- Termination of employment: Our obligation to protect personal data continues even after our employment with the company has ended.

8.3. What measures are we taking?

- Training for employees: We train our employees in the correct handling of personal data.
- Declaration of commitment to data protection: Every newly hired person signs a corresponding declaration when taking up employment that he/she has been trained and instructed in connection with the obligation to safeguard data protection rights.
- Responsible persons: Data protection managers and deputy data protection managers have been appointed in the company who are responsible for data protection compliance and are the contact persons for data protection issues.
- Processing directory: We keep a processing directory as proof of data protection compliance.
- Contracts: In addition to the existing legal obligations, our business partners are contractually obliged to protect personal data.
- SOPs: To ensure consistent and correct processes, we provide corresponding guidelines in SOPs.

9. CONFIDENTIAL INFORMATION & THIRD PARTY RIGHTS



9.1. Our principles

The protection of confidential information, hereby referred to as business and trade secrets, is an essential part of our corporate philosophy.

Business and trade secrets are understood to be facts and findings of a commercial or technical nature that are known to a specific and limited number of people, should not be disclosed beyond this group of people and in whose confidentiality there is an economic interest.

Not only our own business and trade secrets are to be protected, but also those of our business partners of whom we gain knowledge in the course of our business activities, regardless of whether they are part of our own business activities or outside our business area and regardless of the form in which they are available. This information is to be treated with absolute confidentiality and in accordance with the provisions of Austrian and European competition law. We do not tolerate industrial espionage.

As a matter of principle, business and trade secrets are neither passed on to unauthorized third parties nor are they used without authorization for the company's own interests or the interests of third parties. The disclosure or use of business and trade secrets is only permitted if appropriate authorization has been granted by superiors and the respective activity of the employees requires it. Our business partners are requested and contractually obliged to protect business and trade secrets. In addition to safeguarding business and trade secrets, we respect the intellectual property rights of third parties.

Mobile devices must be protected against access to confidential data through theft or loss, manipulation of the devices by software and unintentional and undetected data leakage through cloud services.

9.2. How do we act correctly?

- Deliberate disclosure of information: Before we disclose information, we consider whether the information in question could constitute business and trade secrets and whether we are authorized to disclose it.
- Information retention: We keep business and trade secrets secure and protected.
- Access data: We keep entrusted user passwords, passwords and other access authorizations carefully stored and secret.
- Mobile devices: We store as little official data as possible on mobile devices.
- Conflicts of interest: We do not use business and trade secrets for our own interests.
- Termination of employment: Our obligation to protect business and trade secrets continues even after our employment with the company has ended.

9.3. What measures are we taking?

- Training for employees: We train our employees in the correct handling of business and trade secrets.
- Declaration of commitment to the protection of business and trade secrets: All employees sign a corresponding declaration when they start work, stating that they have been trained and instructed in connection with the obligation to maintain business and trade secrets.
- Policy on handling data carriers / private devices: Every employee receives and signs appropriate instructions when starting work in order to minimize the risk of data being unintentionally leaked to third parties.
- Contracts: In addition to existing legal obligations, our business partners are contractually obliged to protect business and trade secrets.
- SOPs: To ensure consistent and correct processes, we issue corresponding guidelines in SOPs.

10. CORPORATE IMAGE AND COMMUNICATION



10.1. Our principles

Astro Pharma enables clear, transparent, safe and efficient communication and ensures that information is carefully checked and truthful before it is released to the public. This applies in particular to the dissemination of information in publications and on the company's website, as well as to all forms of advertising.

We treat each other, our business partners and third parties professionally and respectfully in order to protect the professional and business reputation of all parties involved. Our employees pay attention to an appropriate tone and behavior in their communication. Professional and respectful interaction is also expected from our business partners and third parties.

Our employees dress correctly and professionally. All forms of communication, in particular documents, emails and presentations, are appropriate and suitable in terms of content and form and are structured as uniformly as possible.

Private statements must be identified as such by our employees. The use of social media means that it is not always easy to draw the line between private and professional information. Our employees therefore take particular care to separate private and professional communication.

10.2. How do we act correctly?

- Communication only with authorization: Without authorization, we do not communicate on behalf of our company outside the scope of our responsibilities.
- Information sharing: Clear and accurate communication is particularly important when it comes to information from financial, customer, or business partners, as well as publications. That is why we do not disclose any information without authorization. We transmit authorized information reliably and honestly.
- Reputation protection: We report any situation that could damage our company's reputation. We generally refrain from and avoid any activities that could harm the reputation of our company or our stakeholders.
- Clothing: We make sure to dress professionally, especially when meeting business partners or representing our company in other ways.
- Objective information: We only disseminate objective information and avoid misleading statements.
- Transparency: When we express personal opinions, whether verbally or in writing, especially on social media, we state that these statements represent our own opinions and do not represent the opinions of the company.
- Avoidance of conflicts of interest: We separate and distinguish our private interests from those of the company. We always act in the interests of the company and ensure that our contact with interest groups is always professional.

10.3. What measures are we taking?

- Templates and samples: We provide templates and samples, especially for company letters and presentations, to support our employees in their external communications.
- Letterheads and signatures: The content of our letterhead and signatures in electronic communications complies with legal requirements.

disease issues is exempt from this prohibition, provided that no direct or indirect reference is made to a medicinal product.

11.2. How do we act correctly?

- Advertising value: Advertising and informational materials provided by us are of little commercial and market value.
- Purpose of advertising material: The advertising and informational materials we provide are relevant to medical or pharmaceutical practice and are not primarily intended for the private use of the recipients.
- Updating and verification of information: The advertising and information materials we provide are up to date and accurately reflect the advertising content. We regularly review advertising materials for relevance and timeliness.
- Occasional and honorary gifts: Occasional or honorary gifts may be granted in appropriate amounts in connection with the recipient's medical activities. Such gifts may be given on the occasion of a promotion, the establishment of a practice, or retirement.
- No support for marketing events: We do not provide support for purely marketing events, but only support professional scientific training events.
- No support for accompanying persons: The costs for accompanying persons, especially relatives, will not be covered.
- No support for entertainment programs: We do not provide support for entertainment programmes and therefore do not cover any accommodation or hospitality costs in connection with an entertainment programme.
- Consulting services, speaker and moderator activities: We only hire service providers whose professional activities are related to the topics of the service.

11.3. What measures are we taking?

- Consulting: When producing and before approving advertising and informational materials, we always seek medical or scientific advice to ensure that the content of the advertising and informational materials is accurate.
- Training courses for employees: We train our employees in the proper handling of advertising and information materials.
- Responsible persons: Our company has appointed information officers and deputy information officers. They are responsible for ensuring compliance with the requirements for advertising and information material and are the designated points of contact for questions on these topics.
- Contracts: We contractually secure support for work-related scientific events as well as consulting services, speaker and moderator activities in order to demonstrably comply with the respective legal requirements.

- Approval process: There is a standardized approval process followed by approval by the information officer.
- SOPs: To ensure consistent and correct processes, we provide corresponding guidelines in SOPs.
- Disclosure requirement: All monetary benefits and payments made by Astro Pharma to doctors and other professionals, medical institutions, and patient organizations are disclosed.

12. LIST OF ABBREVIATIONS

- AMG – Medicinal Products Act
- ASVG – General Social Security Act
- BiVÖ – Biosimilars Association Austria
- GDP – Good Distribution Practice
- GVP – Good Pharmacovigilance Practice
- QPPV – Qualified Person responsible for Pharmacovigilance
- SOP – Standard Operating Procedure