



document

**CODE OF CONDUCT
of the company
SALUS, Ljubljana, d.d. and
the SALUS Group**

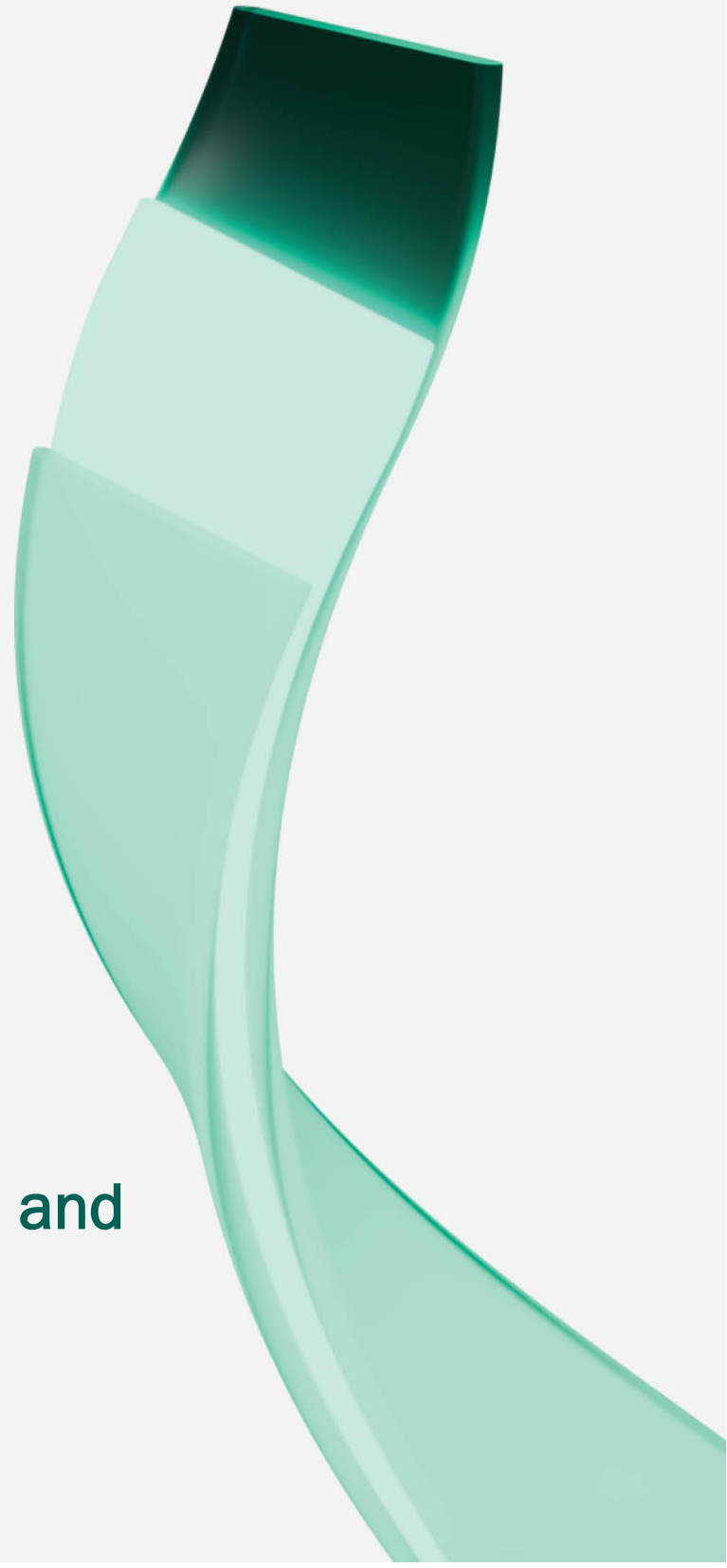


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Message from the Management

Dears,

This is the Code of Conduct, which sets standards of conduct, ethics and responsibility for all employees of the SALUS Group. The Code is not just a formality, but our common guideline that helps us maintain and strengthen a long-standing tradition of trust, integrity and professionalism, on which we build our reputation.

The SALUS Group represents an international business environment, consisting of several companies operating in various countries of Central and Eastern Europe and the Baltics.

We specialize in offering a comprehensive service of distribution, promotion and active sales and accompanying services to bring medicine, medical device or other medical product to the market, which means that as a company we have a special responsibility towards the public, partners, regulators and, last but not least, patients.

The Code of Conduct clearly defines our expectations regarding how we will behave in different situations, whether it is ethical decision-making, compliance with the law, sustainable operations, relationships with our business partners and other stakeholders, or an internal culture of cooperation and respect.

Each of us has an important role to play in putting the principles enshrined in this document into practice.

By using it and setting a personal example, we can all contribute to the functioning of the SALUS Group as a trusted and responsible partner in all the environments where we are present.

Thank you for being a part of our community and for contributing every day to our shared story of consistent business practices and success.

Mag. Žiga Hieng, CFA
President of the Management Board



Gregor Jenko
Member of the Management Board



SALUS promet s farmacevtskimi, medicinskimi in drugimi proizvodi, d.d., Ljubljana, in accordance with relevant legislation, the Slovenian Code of Governance of Public Joint-Stock Companies¹, the Articles of Association of SALUS, Ljubljana, d.d., the Management Policy of the Joint-Stock Company SALUS, Ljubljana, d.d. and the internal rules of the SALUS Group companies, adopts the following

CODE OF CONDUCT

I. Introduction

The SALUS Group has consistently pursued its vision and mission as a vital member and a key partner in the supply of medicines, medical devices and quality and innovative services that contribute to people's health and well-being. The operation of the SALUS Group is based on the observing and respecting the highest ethical standards of cooperation, social responsibility and sustainable development, values that the SALUS Group lives and consistently implements in practice.

The Code of Conduct (hereinafter: the "Code") is designed with the aim of maintaining the long-standing tradition of integrity and credibility of SALUS, Ljubljana, d.d. and the companies within the SALUS Group.

The Code defines the basic principles of acceptable conduct and behaviour of individuals and represents basic and binding guidelines for individuals at all hierarchical and organizational levels of the SALUS Group, as well as a zero-tolerance policy when it comes to actions of individuals that may adversely affect the reputation of the SALUS Group or are inadmissible from a legal, moral or ethical point of view.

The Code is based on values; we are connected by team spirit, we are distinguished by a developmental mentality, we enjoy our work and look forward to achievements, we are professional, bold and persistent. These values connect us and reflect our business culture and behaviour in society and the environment in which we operate. The Code further describes the principles and guidelines that the SALUS Group believes in and follows. At the same time, it is also a governance instrument and part of a broader vision of social and environmental responsibility and sustainable development of the SALUS Group.

¹ The Slovenian Code of Governance of Public Joint-Stock Companies adopted by the Ljubljana Stock Exchange and the Association of Supervisors of Slovenia in a revised form on 2 December 2024.

The Code promotes and develops a culture of integrity within the SALUS Group and commits the entire SALUS Group, all employees and the management of each of the companies that comprise the SALUS Group, in accordance with the interpretation of this Code, to accountability.

II. Slogan

Our slogan is: "*Za dobro ljudi.*" or "*Making Health Accessible.*"

III. We live the values that guide us

Compliance with and adherence to the Code is crucial for the smooth running of operations and the reputation of the SALUS Group, as ethical decisions promote trust and accountability for conduct, both internally and externally. This is a commitment of all employees and all management. Each employee must confirm that they have read, understood and complied with the Code, either through the electronic document system or by signing a statement.

The role of the Compliance Committee is to monitor the implementation of the Code, amend it and/or update it if necessary. The Compliance Committee also has an advisory role in the field of compliance of the SALUS Group. The task of the Compliance Committee is to receive reports of irregularities and suspected violations and to deal with them appropriately.

All our efforts are aimed at ensuring that the Code is consistent with the applicable legislation governing the relevant markets. In the event of inconsistency between the Code and the applicable legislation, the latter shall prevail. In the event of a inconsistency between the Code and the internal documents of the SALUS Group, the Code shall prevail.

IV. Employee relations

The SALUS Group regulates relations with employees in such a way as to ensure respect for personal rights, the personality of employees, the protection of personal data, the prohibition of all forms of discrimination, humane and respectful communication, remuneration for work in accordance with the standards of labour legislation and the amicable resolution of any disagreements.

We provide our employees with a safe working environment. Employees are not exposed to risks and hazards unless they have been informed in advance, trained, and adequately protected against the consequences of such risks and hazards, as required by applicable law.

There is no place in the working environment of SALUS Group employees for any form of harassment, inappropriate comments, actions or behaviour that could humiliate, insult,

express hostility or otherwise interfere with the dignity of colleagues and/or business partners. We reject any behaviour that creates an intimidating, hostile, or offensive work environment.

The SALUS Group strives to apply the principles of fairness, equality and a positive approach when it comes to the evaluation, reward, motivation and career development of employees.

Leading by example

All employees must comply with the Code, which emphasizes that all members of management, executives and senior managers have a special responsibility to set an example to others through their conduct. Every leader must exemplify honesty, integrity and responsible decision-making, and encourage colleagues to follow and act in accordance with the provisions of the Code. Leaders create a culture of trust and open dialogue in which ethical practices are recognized, valued and encouraged. Likewise, each employee, with his or her honest and ethical conduct, represents an important link and an example of appropriate behaviour towards colleagues and other stakeholders.

Safeguarding the assets of the SALUS Group

Employees must carefully protect and responsibly use all the resources of the SALUS Group. These include physical assets such as infrastructure, inventories, equipment, machinery, vehicles, spare parts, raw materials, and finished products, as well as financial assets and other tangible and intangible assets, including confidential and sensitive data, trade secrets, records, information, ideas, intellectual property, and information systems.

The reference in the previous paragraph applies both to assets owned by SALUS Group companies and to those held by any of them.

The protection of intellectual property is crucial to maintaining our competitive advantage, which is why all employees must consistently protect and respect intellectual property rights and use them in a responsible, legal and safe manner.

Employees may use the funds of the SALUS Group exclusively for legitimate business purposes and must protect them against theft, loss, damage, misuse or destruction.

Employees must pay special attention to the protection of assets when working outside business premises, especially when using equipment, data, records and information systems.

Conflict of interest

The trust of all our stakeholders is based on the belief that our employees make decisions that are in the best interest of the SALUS Group.

Therefore, we must carry out our duties responsibly and impartially, without being influenced by any personal interests. It is the duty of each employee to avoid situations that represent an actual or potential conflict of interest between personal interests and business interests of the SALUS Group.

A conflict of interest arises when an employee is involved in decision-making, voting or participation in a matter in which his or her impartiality and objectivity may be compromised due to his or her direct or indirect, personal, financial, family, social, political or other interest, which may include, but is not limited to, the existence of an interest of their family members or any other connection with a third party that may cause the employee to be biased in their decision.

A conflict of interest also occurs when an employee of the SALUS Group uses business opportunities for personal gain.

Each employee is responsible for acting diligently, transparently and in accordance with the principles of integrity in the event of any conflict of interest. We need to be vigilant, transparent and accountable so that potential conflicts of interest are identified, disclosed and managed. If such a case occurs, employees must notify management or their supervisor and formally disclose the nature of the conflict of interest and refrain from any influence on the individuals involved in the decision-making.

Confidentiality

When performing business processes, employees obtain certain information and/or documentation about the SALUS Group, its operations, customers, business partners or other third parties. This information may be confidential and sensitive, either from the perspective of competitiveness, personal data protection, trade secrets protection, or may otherwise be protected.

Employees must always assume that all information is confidential or sensitive and should therefore be protected as a trade secret, unless otherwise determined by the SALUS Group.

When handling confidential data and information, employees must comply with the provisions of the relevant internal acts defining the SALUS Group's trade secret, the protection of trade secrets, the circle of entities bound by the duty to protect trade secrets and their rights, obligations and responsibilities.

Open-door policy

The foundation of the SALUS Group's efforts is openness, accessibility and dialogue. We want employees to be able to freely express their opinions, present ideas, ask questions, make observations and concerns, draw attention to irregularities and report alleged violations, without fear of negative consequences.

Executives and managers have a key role to play in the implementation of the open-door policy. They have a responsibility to be available to employees who reach out to them, to actively listen, to encourage open dialogue and to accept feedback in a respectful and constructive manner.

The SALUS Group encourages employees to discuss all questions and observations with their superiors and/or their supervisors. It is important that every employee feels heard and respected, and that they contribute to a shared culture of trust and responsibility.

Equal opportunities

The companies of the SALUS Group want to maintain and continue the reputation of a reliable, responsible and reputable employer that fosters a sense of belonging, respect and inclusion. Companies are committed to ensuring equal employment opportunities and fair, equal and equitable treatment of all job applicants and employees, regardless of their personal characteristics, such as race, religion, sex, sexual orientation, age, national origin, marital status, disability or any other personal circumstance.

The SALUS Group promotes diversity and inclusion as an important source of innovation and success. It provides employees with a safe, respectful and stimulating working environment in which each individual has the opportunity to develop their potential, contribute their skills and progress based on their achievements.

Child and adolescent work

The SALUS Group strictly complies with the applicable legislation and regulations governing the employment and work of young people in the countries where it operates.

Companies in the SALUS Group may employ adolescents under the age of 18 only if they are older than the statutory minimum age for employment and if the working conditions comply with the requirements of local legislation.

The SALUS Group is strongly opposed to any form of child labour.

In its operations, the SALUS Group is guided by international standards that determine the protection of children from economic exploitation.

The SALUS Group promotes education, training and responsible integration of young people into the working environment, always respecting their dignity and providing conditions that do not jeopardize their safety or opportunities for further education.

Modern slavery

The SALUS Group expressly prohibits any form of forced, dependent or involuntary labour. No one shall be compelled to work against his or her will, under threat of punishment, violence, intimidation or restriction of liberty.

All forms of modern slavery, including human trafficking, labour exploitation, debt slavery, forced labour or other forms of exploitation of individuals, are contrary to the values and principles of the SALUS Group and to basic human rights.

Employees and job applicants have the right to fair and lawful working conditions, to enter into employment relationships voluntarily and to leave their employment freely in accordance with the law. All work must be based on the free choice of the individual, without coercion, threat or restriction of personal freedom.

The SALUS Group respects fundamental human rights as defined by the United Nations and is committed to conducting its business in a manner that prevents and disables any form of slavery or exploitation of human beings.

V. Relations with business partners

Ethics

The distribution and marketing of products and the provision of services must reflect the high ethical standards of the SALUS Group and must be fair, responsible, understandable and in accordance with applicable legislation. When performing our duties, including but not limited to advertising, employees must never make misleading or false statements or claim about products, their ingredients, or their health effects without proper justification and approval, and overestimate or misrepresent the characteristics of products.

Communication

In all contacts and agreements, we strive for open and respectful communication and for fair and balanced relations. Communication with business partners, including competitors, must be extremely careful and thoughtful. All communication must take place in an appropriate business tone, be based on real information and express a professional attitude towards colleagues, business partners and other stakeholders.

We are committed to a culture of respectful dialogue, listening and responsible communication of information inside and outside the organization.

Fair competition

We are committed to operating in accordance with the principles of fair competition. We reject all forms of restrictive practices, such as restrictive agreements and abuse of a dominant position, as well as all acts of unfair competition, i.e. practices that are contrary to good business practices and that may cause harm to other companies.

We must be especially careful when communicating and cooperating with competitors, existing or potential customers, suppliers and other business partners. Any exchange of information or collusion that could be construed as coordination of commercial policy or an infringement of competition law is prohibited.

Employees must consistently avoid any conduct that could indicate or constitute a violation of competition rules. We must always be attentive to what information we obtain, how we handle it and how we communicate with external stakeholders.

We respect the rules of competition law and strive for a healthy, fair, transparent and ethical business environment based on trust and responsible conduct of all participants.

Transparency

Openness and transparency build trust and prevent the possibility of unethical behaviour. We are only allowed to share information with business partners that is allowed, and such information must be clear, transparent and not misleading. All business relationships are built on the principles of transparency and traceability. Contracts, agreements and communication with our partners are clear and documented, business decisions are based on transparent procedures and professional judgment.

We avoid informal agreements that could jeopardize the integrity of the SALUS Group or cause misunderstandings.

All employees must always present services and products to customers honestly and openly, must not engage in misleading and unfair business practices, must clearly present sales programs and consistently fulfill our promises.

Accountability and reliability

We build trust by consistently respecting agreements, deadlines and obligations. We act responsibly, inform about any changes or problems in a timely manner and ensure that we are a reliable business partner.

Employees must not enter into any agreements, formal or informal, written or oral, that violate applicable competition law, or exchange unauthorized information, even at informal meetings, such as trade fairs, customer events or business meetings.

Confidentiality and protection of information

We treat confidential information obtained in the context of business cooperation with the highest level of care, professionalism and responsibility. We use all data that we receive from employees, business partners or other stakeholders exclusively for the purpose for which they were provided.

In our work, we strictly comply with all applicable regulations on the protection of personal data, trade secrets and confidential information, and we consider the internal policies of the SALUS Group regarding the handling of information. We do not disclose, use or otherwise process confidential data in an unauthorized manner or for personal purposes.

We expect our business partners to handle all the information we entrust to them with the same care and responsibility. In case of doubt regarding the level of confidentiality or permitted uses of information, we always consult with the person responsible or competent data protection department.

Compliance with legislation and human rights

The SALUS Group strictly complies with applicable laws, regulations and national and international standards. In our business, we act in accordance with the principles of ethics, integrity and responsibility, and we ensure that our decisions and activities do not violate the law and/or fundamental human rights. We are aware of the importance of protecting labour rights, environmental standards and sustainable development, and we strive to ensure that these aspects are considered in all our business processes. In this way, the SALUS Group creates the foundations for ethical, responsible and sustainable business, which contributes to the trust of all stakeholders and the wider community.

Long-term partnership

We strive for long-term, mutually beneficial relationships based on trust, shared values and mutual respect. Our cooperation with business partners is based on open communication, honesty and responsibility, as we believe that only by working together can we achieve long-term results.

Together with our business partners, we strive for sustainable development, continuous improvement and the creation of added value for all stakeholders, both employees and owners, customers and the wider community. We promote cooperation based on innovation, quality and social responsibility, and strive for a balance between economic success, care for the environment and human and animal welfare.

In this way, we build partnerships that go beyond short-term business goals and contribute to joint development, trust and long-term business.

VI. Relations with healthcare professionals, public officials and holders of public authority

Integrity as the foundation of our operations

The SALUS Group is committed to the highest standards of business ethics and acts honestly, responsibly and transparently. In all our activities, we consistently implement the principle of zero tolerance for all forms of corruption, bribery or unethical conduct. Our conduct is based on integrity, respect and responsibility, i.e. the values that guide our every business relationship and decision.

We do not give, promise, offer, expect, demand and/or accept in return anything of value, any specific, tangible or obvious benefit, preferential treatment or reimbursement through business that would unduly influence decisions or conduct in connection with our business, nor should cooperation give such an impression. All goods, services, financial or other resources that are the subject of cooperation shall in no case constitute incentives or rewards for any past, present, or future willingness to prescribe, recommend, purchase, pay, reimburse, approve, or supply any product or service that may be sold, promoted, or offered by the company or its affiliates.

If any employee obtains information about conduct that could be considered bribery in any way, they must immediately report it to the Compliance Committee.

The SALUS Group conducts its business in accordance with applicable legislation, international standards and ethical guidelines governing the areas of integrity, prevention of corruption and fair competition. We adapt our procedures and practices to local regulations and the best practices of pharmaceutical, medical-technological and other industries.

We believe that honest and responsible operation is the foundation of trust among employees, business partners, patients and the wider community. Each of us contributes to the reputation and credibility of the SALUS Group through our actions.

VII. Information security

The protection of information systems, data and communication networks is the foundation of our trust and successful business. All employees are obliged to act responsibly, safely and in accordance with internal information security policies and applicable regulations.

We make sure that all data, both business and personal, is protected from unauthorized access, loss, alteration or misuse. We act thoughtfully when using information technology; We only use approved devices, applications and tools, regularly update passwords and software, and comply with the rules regarding the use of e-mail and the internet.

Any detected risk, suspected misuse or incident of information security is immediately reported to the competent service. We are aware that by acting responsibly, we protect not only data, but also the assets, reputation and trust of the SALUS Group and all stakeholders with whom we cooperate.

VIII. Responsible bookkeeping and cooperation with authorities

Responsible bookkeeping and records

Accurate and transparent management of business books and records is the foundation of the responsible business of the SALUS Group. With it, we provide a reliable basis for business decision-making, compliance with the law and the trust of investors, shareholders, business partners, employees and the wider community.

All books, records, and entries must fully and accurately reflect the business transactions of the SALUS Group. Accurate records enable us to comply with legal obligations and provide complete, fair, timely and understandable financial and other disclosures.

The SALUS Group has procedures in place for the storage and destruction of documentation to ensure that business books, records and documents are kept, stored and archived in accordance with legal, regulatory, environmental, tax and other requirements.

We expect all employees to act responsibly when creating, processing and storing documentation and not to change, conceal or destroy data without appropriate authorization.

Cooperation with competent authorities

The SALUS Group operates in a spirit of respect, transparency, and responsibility, including in its relations with the competent state authorities, regulators, and supervisory institutions. Our cooperation with them is based on open communication, professionalism, and honesty, as we believe that this is the key to trust and effective operation.

The SALUS Group promotes a culture of cooperation with public institutions in a way that strengthens trust, integrity and responsible business.

All employees must act professionally, truthfully and in accordance with the law and internal procedures when dealing with the competent authorities. In this context, it is important that

accurate, complete and timely information is provided and that the interests of the SALUS Group are always represented in a lawful manner in communication.

If we receive a request, inquiry or subpoena from a competent authority, we must immediately notify our supervisor and the company's management to ensure coordinated, accurate, and transparent communication of information.

Cooperation with tax authorities

The companies of the SALUS Group strictly comply with the tax legislation of the countries in which they are present and act in accordance with international standards.

Our approach to financial authorities is transparent and professional, based on cooperation, transparency, trust, respect, and understanding, with the aim to achieve certainty in determining tax liabilities.

Our policy of taking tax risks is conservative; we do not use schemes for tax avoidance purposes, aggressive tax planning, and we do not align business objectives with tax objectives.

Transactions between related parties are carried out at comparable market prices or using another appropriate transfer pricing method to avoid spillovers of the tax base. However, in the event of any discrepancies, such a fact is considered in the tax reports.

Employees are also expected to cooperate openly and professionally with internal and external auditors, provide them with access to the necessary information and communicate with them honestly.

IX. Money laundering, terrorism financing and blocked individuals and companies

The SALUS Group is committed to legal, transparent and ethical business. We do not allow participation in activities that could facilitate money laundering, terrorism financing or cooperation with persons and entities included in official lists of sanctioned or blocked individuals and entities.

Money laundering

Money laundering means any handling of money or property obtained through a criminal offence which includes:

- the exchange or transfer of money or other property arising from a criminal offence,
- concealing or disguising the true nature, source, location, movement, disposition, ownership, or rights relating to money or other property derived from criminal activity.

Any form of money laundering is prohibited. Transactions are prohibited in which someone receives, exchanges, keeps, disposes of, uses in the course of an economic activity or in any other way, in accordance with the applicable law, by laundering it or attempts to conceal its origin.

Terrorism financing

Terrorism financing is the provision or collection or attempt to secure or collect money or other property of legal or illegal origin, directly or indirectly, with the intention or knowledge that it will be used, in whole or in part, to carry out a terrorist act or other act related to terrorism, or that it will be used by a terrorist or terrorist organization.

Any form of terrorism financing is prohibited.

Blocked individuals and companies

It is prohibited to engage in business cooperation with individuals and entities that are listed on the lists of sanctioned or blocked individuals or entities published by official bodies, e.g. European, American or agencies of other countries.

X. Liability to shareholders

SALUS, Ljubljana, d.d. is a public joint-stock company whose shares are listed on the Ljubljana Stock Exchange. As such, it has a special responsibility towards all its shareholders, investors and the wider financial public.

The SALUS Group operates in accordance with the highest standards of corporate governance and ethical operations, based on accountability, integrity and transparency. The system of governance shall ensure respect for the principle of equal treatment of all shareholders, regardless of their size, influence or ownership share.

We are committed to accurate, comprehensive and timely disclosure of information on the operations, financial position and business results of the SALUS Group, as required by applicable regulations.

In this way, we strengthen the confidence of investors, shareholders and other stakeholders in the transparent and accountable operation of the SALUS Group.

XI. Communication with the media and on social networks

On behalf of the SALUS Group, only authorized personnel may communicate with the media. Any communication with the media must be coordinated, credible and in line with the company's strategic communication.

In the course of our work, our employees are constantly acquiring and are in contact with confidential and sensitive data, information, ideas and records. Therefore, it is important that we are aware that we must not give or disclose any information or data in an unauthorized manner if we are contacted by representatives of the media, investors, market analysts or the public who want to respond to questions, requests for clarification, opinions or data related to the SALUS Group.

In such a case, we follow the prescribed internal protocols or consult with superiors.

Particular caution should also be exercised when posting on social networks and other public platforms. Private opinions expressed in the public space should be clearly marked as personal and should in no way give the impression that they represent the views of the SALUS Group. Each employee is responsible for protecting the reputation of the SALUS Group and respecting the principles of business communication, even outside working hours.

XII. Political activity

The SALUS Group remains politically neutral. It does not make, promise or intend, directly or indirectly, political contributions to any political party, candidate, movement or organization associated with politics.

The SALUS Group respects the right of employees to personal political beliefs and private political participation. However, the political opinions and activities of individuals must be clearly separated from their professional activities and working environment.

Employees working on the premises of the SALUS Group companies or within the scope of their work duties are not permitted to:

- disseminate or promote political beliefs,
- persuade or encourage colleagues to engage in political actions,
- carry out political activities,
- use the resources, name or reputation of the SALUS Group for political purposes.

Employees who engage in political activity outside working hours must ensure that their impartiality at work is not affected and that their actions do not create the impression that they are acting on behalf of and/or for the account of the SALUS Group.

XIII. Attitude towards animals

The SALUS Group is committed to respecting high standards in the treatment of animals and supports a responsible, humane and ethical attitude towards their welfare.

All employees and all companies of the SALUS Group must, where relevant to their business, act in accordance with applicable legislation, local regulations and international guidelines in the field of animal protection and welfare.

We encourage the selection of partners and suppliers who act in accordance with ethical standards of animal protection and transparently report on their practices in this area.

The attitude towards animals reflects the broader social responsibility of the SALUS Group and our commitment to sustainable and responsible business.

XIV. Sustainable development

Business sustainability policy of the SALUS Group and the company SALUS, Ljubljana, d.d. is based on the belief that long-term successful business operations can only be achieved with balanced consideration of economic, environmental, social and governance aspects. We are committed to a sustainable approach that includes responsible management of natural resources, respect for human rights, ethical management and transparent cooperation with all stakeholders.

Sustainable development is not only our business orientation, but it is a way of thinking and acting that we implement every day. Our employees play an important role in this, and with their knowledge, dedication and innovation, they co-create a culture of responsibility and respect. We encourage them to behave sustainably, develop personally and professionally, and actively contribute to improvements in all areas of the SALUS Group's operations.

We are aware that only with an inclusive approach and the cooperation of employees, partners, suppliers, shareholders and the wider community can we build trust and long-term value for everyone. Our goal is to create positive effects for individuals, society and the environment, thereby contributing to a better, fairer and more sustainable future.

We have divided our sustainability commitments into three key pillars:

1. pillar – We operate environmentally friendly (E)
In our efforts to achieve sustainable business operations, we focus on the responsible use of resources, improving energy efficiency, and reducing carbon footprint, waste and other environmental impacts.
2. pillar – We are socially responsible (S)
Corporate social responsibility is achieved by providing quality jobs, promoting equal opportunities and contributing to the sustainable economic and social development of employees, business partners and other stakeholders.
3. pillar – We manage with integrity (G)

We are committed to long-term, responsible and transparent business practices based on ethical principles, good governance and adherence to the highest standards of integrity.

XV. Speak-up policy and reporting alleged violations

The SALUS Group encourages and urges all employees to follow this Code and the internal regulations of the companies within the SALUS Group, and to report any violations of the Code, other regulations, internal acts, documents, and inappropriate practices in the spirit of responsible conduct.

The SALUS Group guarantees full protection for employees in all cases of whistleblowing and reporting violations, including the option of anonymous reporting, and ensures that every report of an alleged violation will be treated seriously, confidentially, and professionally.

Interpretation

Terms used in this Code of Conduct

State authority means a state-owned or state-controlled body and for the purpose of its application in this Code also the administrations of local self-governments, public agencies, public funds, public institutes, public economic institutions and other entities of public law, that are direct or indirect users of state budget or the budget of local self-government.

Public official means a person who enters into employment in public sector, i.e. a person being employed either by state bodies, local self-government, public agencies, public funds, public institutes, public economic institutes, public law entities that are direct or indirect users of state budget or the budget of local self-government, either in public companies and companies whose majority or dominant influence is the state or local self-government.

Code means the Code of Conduct of the company SALUS, Ljubljana, d.d. and the SALUS Group.

Committee is the Compliance Committee, a body within the SALUS Group, whose role is to monitor the implementation of the Code and its periodical review, amendment and/or updating if necessary. The Committee receive concerns reports of alleged violations of business compliance and examines them properly. Its role is also to advise on the compliant business conduct of SALUS Group.

Corruption means any violation of due conduct of the official and responsible persons in the public or private sector, as well as the conduct of persons who are the initiators of the offense or persons who can benefit from the breach, due to directly or indirectly promised, offered or

given or requested, accepted or expected benefit for himself or for another². Corruption takes many forms, from bribery, extortion, to fraud, embezzlement, nepotism³ and clientelism⁴.

Public Authority Holder means a legal entity of private or public law or a natural person who, based on law, acquires public authority to perform certain functions of the state administration.

Intellectual property rights mean all SALUS Group intellectual property rights, including but not limited to, all copyrights, trademarks, service marks, brand names, marketing image, trade secrets, software licenses, patents, domains, websites, and use of the above.

Relevant market means a market defined by the relevant product or service market and the relevant geographic market where SALUS Group operates.

SALUS, Ljubljana, d. d. means the company SALUS promet s farmacevtskimi, medicinskimi in drugimi proizvodi, d.d., Ljubljana, register number: 5002796000 which is a parent company of SALUS Group.

SALUS Group is a group of legally independent companies which are in such a relationship with each other that, pursuant to the provisions of each time applicable Slovenian Companies Act, they are considered to be affiliated companies, whereby SALUS, Ljubljana, d.d., registration number 5002796000, is the controlling company.

Employee is a common denomination for all employees of SALUS Group, regardless of whether they are employed for an indefinite full-time or part-time basis, fixed-term, indefinite part-time or otherwise, and also includes personnel working through employment agencies and students.

Rules of interpretation

Unless the context otherwise requires, the following shall apply to the terms used in this Code:

- the reference to the SALUS Group includes both the parent company and the subsidiaries of the parent company and the subsidiaries of the subsidiaries;
- words used in the singular also refer to the plural and vice versa;
- the use of pronouns covers the appropriate masculine and feminine forms;
- the term "person" includes individuals, legal persons or entities, entrepreneurs, companies, communities and associations, including successors;
- the words "covers", "comprises" and "includes" are used in conjunction with the phrase "without limitation";

² Point 1 of paragraph 1 of Article 4 of the Integrity and Prevention of Corruption Act (Official Gazette of the Republic of Slovenia, No. 69/11 – official consolidated text, 158/20, 3/22 – ZDeb, and 16/23 – ZZPri).

³ A form of favoritism based on acquaintances and family relationships, where someone in an official position abuses their power and authority to secure a job or service for a family member or friend, even though they are not suitable or deserving (<https://www.transparency.si/nepotizem>).

⁴ An unequal system of exchange of resources and services based on an exploitative relationship between a wealthier and/or more powerful 'patron' and a less wealthy and weaker 'client' (<https://www.transparency.si/klientelizem>).

- reference to laws, regulations, rules, regulations, directives, instructions or other binding decisions of state authorities means a reference to each applicable document in an updated, extended, consolidated version or modified form and includes all subordinate documents adopted based on this document, unless expressly provided otherwise;
- reference to contracts, acts or documents means a reference to contracts, acts or documents that are in force at any time, unless otherwise expressly provided.