



## **CODE OF CONDUCT OF REDCARE PHARMACY N.V.**

### **ENDORSEMENT BY THE EXECUTIVE MANAGEMENT**

At Redcare Pharmacy, it's always our top priority to provide our customers with the right products, the right knowledge and the right services, every day. While doing that, we are committed to maintaining high ethical standards.

Our Code of Conduct explains what we stand for and what we expect from our employees and those who are working for us, individually and collectively. It reflects how we want to live our core values and sets out our principles for acceptable behaviour within our organisation and in our interactions with third parties as well as with each other.

Living our values and abiding by this Code of Conduct is not always easy. You may face conflicting pressures and dilemmas. Sometimes, it may even mean having to reconsider our activities or let business opportunities pass us by. It takes courage to make the right decisions, but this Code of Conduct gives you the guidance you need to do so.

It is your responsibility to understand the Code of Conduct and its underlying policies and to uphold our principles in your daily work. If in doubt, we encourage you to use our "Speak Up" channels to voice your concerns.

We all share a joint responsibility for maintaining a healthy corporate culture and complying with this Code of Conduct.

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## INTRODUCTION

This Code of Conduct applies to all employees of the Redcare Pharmacy N.V. and its subsidiaries (**Redcare Pharmacy** or **Company**) and all other people who are working within Redcare Pharmacy, for example interns, temporary staff and consultants (**We**).

This Code of Conduct has been adopted by the Managing Board of the **Company** and has been approved by the Company's Supervisory Board. This Code of Conduct has an effective date of 5 September 2024 and replaces the code of conduct dated 14 April 2022. It will be publicly available on the Company's corporate website.

An overarching principle for our business conduct is that we comply with the applicable laws and regulations of the countries in which we operate and that we, at all times, ensure that our products and services comply with the highest possible safety and quality standards.

This Code of Conduct cannot anticipate every situation you may encounter nor does it remove the need to use common sense and professional judgement.

## PRINCIPLES

### 1. PERSONAL INTEGRITY

#### 1.1 Behaviour

**We start everything with people.** We conduct our business operations with honesty, integrity and openness and with respect for others. High standards of personal behaviour must be observed in the relationships with each other as well as in dealing with customers, patients, suppliers, business partners, shareholders, public officials and other stakeholders. We avoid any behaviour that might harm our performance or reputation.

#### 1.2 Health and safety

**We care about our people.** We provide healthy and safe work environments for our people and comply with all applicable health and safety laws relevant to the workplace, and put a special emphasis on Occupational Health and Safety. Our people will continuously be trained to ensure that they know what to do in case of an emergency and to follow all health and safety laws and regulations, report any accidents, injuries and unsafe practices or conditions through the respective channels immediately.

#### 1.3 Equal and fair treatment – diversity and inclusiveness

**We open doors for anyone.** We respect people's fundamental dignity and their human rights. Our core belief is that diverse and inclusive teams create the most sustainable value and makes equal opportunities for people with diverse demographic, cultural or sexual backgrounds, perspectives and beliefs a priority. This includes our employee's professional and personal development, fair and equal pay and long-term social protection measures. Our belief is anchored in our values, our actions, in our policies and in our commitments to comply with applicable laws,

regulations and international standards. We acknowledge the freedom of association of our employees.

#### **1.4 Zero tolerance for discrimination, harassment and bullying**

We treat each other with respect and without prejudice. We do not discriminate on the basis of age, gender, race, ethnic background, religion, sexual orientation, political beliefs, citizenship, marital status, family status, disability or on any other ground protected by applicable law.

We promote a workplace that is safe and free from physical and verbal harassment and bullying. We do not engage in any behaviour which violates the dignity of another person or creates a disrespectful or intimidating work environment.

#### **1.5 Education & development**

We are committed to a strong learning culture where continuous feedback is promoted and people can further develop their full potential. Our employees are encouraged, enabled and empowered to take sustainable aspects into consideration in their daily work and when making (strategic) decisions.

### **2. BUSINESS INTEGRITY**

#### **2.1 Reliable**

We conduct our business operations with honesty and openness and in accordance with good business practice. We recognize that, in dealing with third parties, reliability and integrity are essential preconditions. We will always act in good faith and we refrain from acts that may damage these preconditions.

We cooperate with all authorities and we do not obstruct, impede or improperly influence any official proceeding or investigation. In all interactions with public officials, we act in accordance with our Public Affairs Policy.

#### **2.2 Competition and antitrust**

We do not engage in any anti-competitive practices which include agreements, arrangements or concerted business practices which appreciably prevent, restrict or distort competition.

We do not exchange information with competitors regarding costs, suppliers, market share, or any other information in violation of applicable competition or antitrust laws and regulations. Specific guidelines on this topic apply.

#### **2.3 Bribery, corruption and money laundering**

We do not offer, pay, demand or accept bribes, kickbacks, facilitation or similar payments to retain or obtain business, influence decisions or secure an improper advantage. We do not make use of a third party to pay or accept bribes, kickbacks, facilitation or similar payments.

Corporate hospitality and/or gifts may only be accepted if the advantage provided is reasonable, proportionate and intended to build a legitimate business relationship.

We only accept funds received from legitimate sources and do not engage in money laundering (i.e. where money obtained by illegal means is passed through a legitimate business to hide its true source). We do not in any way facilitate or assist anyone attempting to conceal or benefit from the proceeds of an illegal activity.

#### **2.4 Conflict of interest**

Situations where personal activities or financial interests could or can be reasonably perceived as a conflict with the interests of Redcare Pharmacy must be avoided at all times. A conflict of interest is assumed to take place if you seek personal gain by misusing your position at Redcare Pharmacy.

#### **2.5 Data privacy and protection**

We are committed to ensuring outstanding data privacy and security by going beyond the legal requirements. We consider a “privacy by design” approach in the development of our products and services. We only process personal data when there is a legitimate business purpose to do so. For more information go to our Privacy Policy and our Information Security Practices.

#### **2.6 Healthy life – healthy planet**

We actively help to make the world a better place and to care well for the environment, climate and the earth. Sustainable development is an integral part of our strategic positioning aimed at the creation of shared value for all our stakeholders and we include sustainability aspects in our business decisions by default. We contribute to the achievement of the UN Sustainable Development Goals (“SDG”) by having identified SDGs on a target level. We have committed to a net zero 2040 target, in alignment with the Paris Agreement’s 1.5°C, including scope 1, 2 and 3 emissions. Our circular packaging strategy with specific targets is aimed at reducing the negative environmental impact of packaging used for shipping. See our corporate website for more information.

### **3. COMPANY PROPERTY**

#### **3.1 Responsible use**

We ensure the proper use, protection and conservation of our Company properties. Company belongings cannot be used for (i) illegal activities, (ii) inappropriate activities that can offend others or can be harmful to the Company, (iii) the pursuit and achievement of your personal benefit.

#### **3.2 Confidential information**

Business information is valuable to us and must be protected from making it public. All business information relating to the Company’s businesses such as, but not limited to, our partners, customers, suppliers, strategy, business plans, intellectual property, organisation and financial performance, is the Company’s proprietary information. We must keep business information confidential and not share it with third parties without an authorised business reason and a non-disclosure agreement is in place.

### 3.3 Inside information

Since Redcare Pharmacy is a stock listed company, We must comply with the market abuse regulation. We ensure that confidential information which, if made public, could have a significant effect on the price of Redcare Pharmacy securities i.e. shares (“*inside information*”), is not illegitimately disclosed. We ensure that we adhere to our **Inside Information Policy** which includes a prohibition to (advise or encourage others to) trade in Redcare Pharmacy securities based on inside information.

### 4. SPEAK UP

We encourage everyone to speak up whenever a colleague has done something contrary to the principles of our Code of Conduct.

It’s our joint responsibility to raise any concerns about actual or potential violations of laws and regulations, policies and procedures as well as any other suspected irregularities. By reporting misconduct, we are helping to protect our company.

Consult our Speak Up Policy for the different channels you may go to, to report your concern and which, as a last resort, also allows for the possibility to report concerns anonymously.

#### **Protection - no retaliation**

We respect whenever concerns about improper behaviour are being reported. We will not retaliate or allow retaliation against anyone who, in good faith, reports a potential violation of this Code of Conduct or of any policies or procedures.

It’s important to remember however that deliberately false allegations must not be made against others where there are clearly no grounds to do so. Disciplinary measures may be taken if this is nevertheless the case.

### 5. MISCELLANEOUS

Non-compliance with the provisions of this Code of Conduct may lead to internal disciplinary measures, including but not limited to dismissal and administrative sanctions, or could result in civil or criminal penalties. If the law prescribes a stricter rule, restriction or obligation than a provision of this Code of Conduct, the stricter rule, restriction or obligation prevails.

This Code of Conduct may be amended and/or supplemented from time to time with an effective date so specified.

This Code of Conduct is governed by Dutch law.

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