

## **Zentiva Code of Ethics Implementation procedures**

This document summarizes mechanisms in place to assure effective implementation and adherence to [Zentiva Code of Ethics](#) (the "Code").

### **Responsibilities**

The Code is applicable to all Zentiva employees and everyone who acts on behalf of Zentiva. Each employee is required to understand the Code and adhere to the values, principles and requirements set forth in the Code.

Head of Compliance is authorized and instructed to control compliance with the provisions of the Code on a global level.

Each Country Manager is responsible for local implementation of the Code and authorized and instructed to control compliance with the provisions of the Code in the geographical area of his/her responsibility.

Each Country Manager shall be supported by a dedicated employee acting as a local compliance representative (the "**Compliance Representative**") when implementing the Code, raising awareness and controlling compliance with the provisions of the Code.

The Compliance Representatives shall observe implementation and adherence to the Code in respective country/region and shall promptly inform Head of Compliance in case of any actual or suspected breach against the Code.

Zentiva's contractual partners are expected to get acquainted with the Code and are requested to accept its values and principles through a standardized provision incorporated in Zentiva's contractual arrangements.

### **Training**

Each employee is required to complete a training on the Code within three months after his/her onboarding (for non-employees – within three months upon assignment of the training). The training is being provided either online or F2F and shall be repeated by at least once in two years.

For successful completion of the training, each person undergoing the training needs to pass a quiz in the end of the training in order to validate that he/she has adequate knowledge of the Code. Each person who successfully completed the training is requested to confirm and sign that he/she reviewed and is acquainted with the Code, completed and understood the training, successfully passed the quiz and will act in compliance with the Code.

### **Employees' appraisal system**

Compliance is one of the pillars that influence employees' remuneration and annual bonus. Each Zentiva employee is expected to follow the Code and adhere to its values and principles. Fulfilment of this requirement is part of employee's objectives and it is being revised during regular performance review with his/her manager that has significant influence on his/her bonus calculation.

### **Reporting on breaches and disciplinary actions**

All employees and other stakeholders are encouraged to report any actual or suspected breach against the Code. All breaches (either reported or identified) will be addressed by the Compliance department with information flow to the Compliance Committee. If any breach is proven, appropriate measures shall be taken in accordance with internal rules and applicable legal regulations. In serious cases, a breach may result in dismissal or termination of a relationship and reporting the breach to the respective authorities.

For more information, please refer to the Corporate Policy on Disciplinary and Corrective actions.

### **Focal points of contact, Speak Up initiative and Whistleblowers' protection**

The Compliance Representatives are dedicated focal points of contact for any compliance related matter, providing appropriate guidance to Zentiva's local stakeholders.

Each employee may raise questions and/or concerns to his/her direct or indirect manager, respective Compliance Representative, Head of Compliance, any member of Zentiva Executive Committee, HR department, designated person (pursuant to applicable legislation on whistleblowing) and/or through the Speak-Up initiative.

The Code sets essential rules for Whistleblowers' protection and Zentiva Speak Up initiative. Both Whistleblowers Protection and Zentiva Speak Up initiative are covered by detailed internal rules in each Zentiva company.



**Petra Říhová**  
Head of Compliance, Zentiva