



# Code of Conduct

leading regeneration

**Geistlich**

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## 1 | Introduction by CEO and BoD



### Compliance is our license to operate.

Geistlich's reputation is one of our most valuable assets and fundamental to our success. It fills us with pride that we have built a strong and attractive brand, that our products are world-leading and that clinicians perceive us as a reference in regenerative medicine.

With this Code of Conduct, we want to promote a culture of ethical behavior that protects what we have built up over decades: A culture that builds on trust and collaboration, diversity and inclusion, learning and engagement, and responsibility and accountability to help each employee to achieve their best. As a globally operating MedTech-company we respect international and local laws, regulations and requirements. We respect human rights and the environment wherever we do business as a key to sustainable development.

This Code of Conduct is designed to ensure that Geistlich's business is always conducted in a legal, ethical and responsible manner. It has been approved by the Executive Leadership Team and the Board of Directors of Geistlich Pharma. It expresses Geistlich's expectations regarding business conduct not only by its employees but also by its suppliers, contractors and other business partners. The right mindset and correct behavior are an important personal contribution by each employee to our company's success and reputation.

A handwritten signature in blue ink, appearing to read 'A. Geistlich'.

Dr. Andreas Geistlich  
Chairman

A handwritten signature in blue ink, appearing to read 'D. Gabathuler'.

Diego Gabathuler  
CEO

## 2 | Guiding Principles of this Code of Conduct

This Code of Conduct is based on the principles of ethical and legal business behavior, fair and respectful treatment of customers, business partners, authorities, competitors and all Geistlich Pharma employees. Its fundament is the commitment to our values, corporate goals and our reputation.

This Code is complemented by other corporate policies and local internal regulations which may vary to account for country-specific legal requirements and business practices.

As a Geistlich Pharma employee you are required to adhere to this Code of Conduct. You have to familiarize yourself with our Code and other internal policies and regulations. You must also be familiar with the laws applying to your field of responsibility. If there is any conflict between this Code and applicable laws or regulations, you must comply with the latter.

Any decision you make shall be aligned with the business practices outlined in this Code. When encountering situations that appear to be suspicious, unethical or improper, even if they do not obviously contravene this Code, other internal regulations or the law, you should use common sense and sound judgement to address the situation.

If you are in a leadership position, you have a special responsibility and are expected to lead by example. Speak with your team about integrity and ethics, making clear that you expect work to be done and results to be obtained in a proper way, following the principles of this Code.

**Integrity and trust are the basis of our business activities.**



## 3 | Responsible Business

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### 3.1 Access to Medical Devices & Pharmaceuticals

We are committed to bringing more of our medical devices and pharmaceuticals to more people, no matter where they are. We strive to integrate access strategies into how we research, develop and deliver our healthcare products globally.

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### 3.2 Environmental Sustainability

We are committed to minimizing the environmental impact of our activities and products. As a corporate citizen we have to protect the environment for future generations. We strive to minimize our effect on climate by reducing our carbon footprint, waste and water usage and by efficient use of energy and natural resources.

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### 3.3 Human Rights

We are committed to conducting our business in a manner that respects the rights and the dignity of all people. Respect for human rights is a legal and ethical obligation.

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### 3.4 Professional Practices

We are committed to maintaining high standards of ethical business conduct wherever we do business. Interacting in an ethical manner and operating with integrity is the guideline of our daily decision-making and has a profound impact on building trust with patients, customers, other business partners and society in general.



# The quality and safety of medical devices and pharmaceuticals is of critical importance for patients worldwide.

### 4.1 Product Quality and Safety

We are committed to following strict quality and safety monitoring and evaluation processes at every stage of product lifecycle.

Our comprehensive quality management system is designed to build quality into our products from the development of a product to the production of each and every unit for the market. However, healthcare products can have potentially undesirable effects. We report adverse events and quality complaints in due time to quality assurance, take appropriate actions to safeguard patient safety and transparently communicate the risks of our products to the regulatory authorities.

### 4.2 Research and Development

We are committed to conducting research and development ethically, with integrity and for the right reasons.

We respect the rights, safety and dignity of individuals and communities, protect scientific integrity and make sure that any data or information we create or are responsible for is true, accurate and fair. We do not make false or misleading statements.

We are committed to using preclinical testing and evaluation methods that use In vitro methods whenever possible, following the principle of reducing, refining and replacing In vivo studies.

Our contractors for In vivo preclinical studies (e.g. to meet regulatory requirements) are committed to upholding the highest standards for reasons of ethics and as a prerequisite for accuracy and reliability of scientific studies.



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### 5.1 Diversity and Inclusion, Fair Employment Practices

We are committed to creating a diverse and inclusive environment with safe places to work, treating all associates with dignity and respect. Diversity adds value and supports our ability to serve an increasingly diverse customer base. We provide all associates with fair and equal opportunities for employment, development and advancement.

We will not tolerate any form of discrimination based on gender, ethnicity, age, religion, nationality, disability or sexual orientation or harassment, mobbing, bullying or retaliation in the workplace.

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### 5.2 Health and Safety

We are committed to promoting the health and safety of our associates, contractors, visitors and communities in which we operate.

We ensure a rigorous process to identify and mitigate health and safety risks and promote best health and safety practices.

**Fair competition drives innovation. Our best advantage is the quality of our products.**



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#### 6.1 Anti-Corruption and Bribery

We are committed to not tolerating any form of bribery or corruption to or from a private individual, a public official or any third party.

We will not give, offer or promise to give anything of value, either in the form of monetary payments or other advantages like free services, donations or valuable favors, or accept, request or agree to accept anything of value for the purpose of improperly influencing any decisions. We will not use third parties to commit acts of bribery or corruption.

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#### 6.2 Anti-Trust and Fair Competition

We are committed to engaging in a fair competition and to competing on the merits of our products and services.

We will not engage in agreements or conduct that unlawfully prevent or restrict competition.

Our marketing and sales practices respect the regulations of the respective authorities and regulatory bodies. We only allow legitimate and honest practices conveying truthful information concerning our products and services.

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#### 6.3 Financial Integrity

We are committed to providing timely, accurate and complete financial information complying with applicable laws, accepted accounting principles and financial reporting guidelines.

We ensure that the information we supply to entitled bodies provides an accurate view of our financial situation.

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#### 6.4 Customs and Trade Compliance

We are committed to complying with customs regulations, export controls and trade laws.

We do not engage with persons or parties that have been placed by governments on sanctioned party lists. We will comply with laws and regulations governing the distribution and use of our products in markets we choose to operate in.

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#### 6.5 Privacy and Data Protection

We are committed to collecting, storing, processing and using personal data we are entrusted with in a responsible way.



Any information related to an identified or identifiable person is collected, stored, processed and used only to the necessary extent and in compliance with applicable data privacy laws.

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### 6.6 Business Continuity and Crisis Management

We are committed to ensuring adequate supply of our products and services to customers and patients.

We will take reasonable efforts to protect customers, patients, associates, assets and the business from a disruptive incident.

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### 6.7 Information and Cyber Security

We are committed to protecting our data and technology to ensure that information is kept safe from theft, loss, misuse or disclosure.

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### 6.8 Third-Party Risk Management

We are committed to working with third parties (business partners like suppliers, contractors, distributors, consultants) who operate in a manner that is consistent with our values and ethical principles. Our success depends on strong, reliable and reputable partners. We select the parties best suited

for our business based on objective criteria, their competence, integrity and other relevant merits and strive to make them uphold these standards.

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### 6.9 Intellectual Property Rights and Proprietary Information

We are committed to respecting the intellectual property rights of third parties and to never using illegal or dishonest means to obtain confidential proprietary information from or about any person, company or competitor and to reject confidential proprietary information offered by third parties.

We are committed to protecting Geistlich Pharma's intellectual property rights and to only disclosing Geistlich Pharma's proprietary information or legally acquired proprietary information about third parties to associates with a legitimate business need to know such information.

Our patents, trademarks, domain names, regulatory data, copyrights etc. are valuable assets and key to our success. Geistlich Pharma will defend its intellectual property rights when they are violated.

**We respect the obligation of healthcare professionals to make independent decisions on treatment of their patients.**

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### 7.1 Conflict of Interests

We are committed to ensuring our business judgment is not influenced by personal interests.

We avoid situations where our personal interests or those of our family, friends or close personal acquaintances conflict, or appear to conflict, with the interests of Geistlich Pharma. We will disclose and manage potential, perceived and existing conflicts of interest.

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### 7.2 Gifts and Entertainment

We are committed to neither giving nor accepting gifts or entertainment that may raise concerns about our personal integrity.

We strive to avoid the reality and perception of improper relations with existing or potential business partners, both public and private, in that gifts and entertainment may only be offered unsolicited or accepted if they do not go beyond common courtesy, local business practices and are not perceived to be lavish, inappropriate or likely to influence the recipient's decisions. We follow more stringent rules for certain groups and persons, for example healthcare professionals and healthcare organizations.

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### 7.3 Protection of Property and Assets

We are committed to the proper use of Geistlich Pharma facilities, property and equipment.

We do not use company property, including information and service of employees, for personal advantage or in activities not related to the company. We handle company property carefully, use it for legitimate business purpose only, use IT equipment securely and report loss or theft immediately.

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### 7.4 External Communication

We are committed to passing true, fair and accurate information about the company, its people, customers, products, services etc. into the public domain, including social media, responsibly and in compliance with applicable laws and internal guidelines.

We have designated specialists to handle external enquiries and to coordinate communications to external audiences. Only authorized employees may speak on behalf of Geistlich Pharma. All employees are expected to use social media with due care, taking into account that work-related posts, likes etc. may be perceived as company opinion even when private accounts are used.

## 8 | Compliance Management

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### 8.1 Getting Advice

If you are uncertain about applicable laws or internal regulations, if you have any doubts about correct behavior or the interpretation of this Code, the right thing is to seek help and advice. It is usually the best to speak directly to your supervisor or the function defined for your area of concern in the respective internal regulation. Alternatively, you may contact Human Resources, the Director Legal, Compliance & IP, the Corporate Compliance Officer or a member of Senior Management.

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### 8.2 Speak Up

Geistlich Pharma employees who speak up when they believe in good faith that this Code of Conduct has been breached are doing the right thing and are acting in line with our company values. Geistlich Pharma management needs to be aware of integrity issues to address them quickly and in a trustworthy way. By raising concerns regarding compliance with this Code, employees help to protect themselves, their colleagues and Geistlich Pharma's interests. Geistlich Pharma will not tolerate any form of retaliation against employees raising concerns in good faith.

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### 8.3 Breaches

Breaches of this Code of Conduct will not be tolerated and can lead to disciplinary action up to and including termination of employment.

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### 8.4 Compliance Responsibilities

We do business in a highly regulated industry. Compliance with legal and regulatory requirements and our internal policies and procedures implementing these requirements is a prerequisite for our license to operate. The sense of responsibility of each and every employee is key to compliance.

We are all personally accountable for adhering to our Code of Conduct.

Nonetheless, we also understand compliance with our Code of Conduct to be a key line management responsibility. Line managers are expected to carefully select, instruct and monitor their employees and involve compliance aspects in their performance assessment. The BoD will regularly review code adherence across Geistlich Pharma.

**This Code of Conduct  
was approved by the BoD  
and enters into force on  
01.01.2023.**

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