



EB PHARMA

EB Pharmaceutical Ltd.

CODE OF CONDUCT

2025/01/15

Version: 1

Code of Conduct

EB Pharma is committed to providing products of the highest quality to patients. We conduct our work with professionalism, adhere to business ethics, and emphasize integrity.

This Code of Conduct outlines the legal, regulatory, and ethical standards that every individual representing EB Pharma (Company) must follow when conducting business.

If there are any matters not covered by this Code of Conduct, they shall be governed by the relevant laws and regulations of the Republic of China, international trade regulations, industry standards, and the Company's Employee Work Rules.

President

Wei-Cheng Wang

Anti-Bribery Policy

- ◆ We absolutely do not tolerate any form of bribery or corruption.
- ◆ We will not offer, provide, or promise any valuable goods, such as gifts, privileges, hospitality, or payments to improperly influence any decisions.
- ◆ We will not engage third parties or intermediaries (e.g., agents, consultants) or any other business partners to carry out bribery or corrupt activities on our behalf.
- ◆ We will not treat government officials differently from private sector employees in area of bribery and corruption: bribery and corruption are unacceptable regardless of the recipient's identity.

Interaction with Patients and Patient Groups

Sales personnel are prohibited from interacting with patients and patient groups. Other employees, if required, must obtain prior approval from the Company before engaging with patients or patient groups. During such interactions, any improper influence is strictly forbidden. When collaborating with patient groups, the nature and content of the Company's involvement must be fully documented and properly stored by relevant department in the Company.

Interaction with Healthcare Professionals (HCPs)

Employees must respect and value the independent decision-making of healthcare professionals (HCPs). Interactions with HCPs must be responsible, ethical, and transparent, in full compliance with legal, regulatory, and industry standards. These interactions should have a clear, truthful, transparent, and appropriate purpose, aimed at benefiting patients, medical practices, and the overall healthcare system.

Employees are prohibited from offering, providing, or promising any valuable goods to influence recipients to act in the Company's favor, reward such behavior, or avoid actions detrimental to the Company.

Interaction with Government Agencies and Public Officials

Employees must not offer any compensation, gifts, or hospitality, directly or indirectly, to public officials for the purpose of establishing or maintaining business relationships or obtaining improper advantages. If hiring public officials for paid professional services such as consultations, advisory roles, or acting as speakers, these officials must provide such services in their capacity as HCPs, scientists, or academics. When acting in these roles, they must comply with other relevant laws, regulations, and industry standards that the Company must adhere to. Employees must maintain boundaries and comply with anti-corruption and anti-bribery laws.

Political Donations

Employees are prohibited from making political donations to any political party or public office candidates.

Communication of Scientific and Medical Information

When conveying product-related information, employees must adhere strictly to the content in the product's package insert or use approved documents for such purpose. Employees must not exaggerate facts.

We are committed to maintaining fair competition in the market and employees must not make false claims on competitors' products.

If employees discover defective drugs, they must take it seriously and immediately report it following the Company's adverse event reporting procedures.

Protection of Confidential Information

The protection of confidential information is crucial to the Company, its clients, and third-party collaborators. For further details, please refer to the Intellectual Property Ownership and Confidentiality Agreement.

Public Disclosure

Employees are prohibited from making public comments about any events related to business or the Company, and must not accept media interviews or post comments about the Company on blogs, chat rooms, or social media sites.

Personal Data Protection

Employees must comply with data protection laws, including those related to the personal data of employees, customers, suppliers, patients, healthcare providers, consumers, clinical trial subjects, and business partners.

Insider Trading

Insider trading is illegal, and laws on securities apply to everyone, not just employees of public companies. Insider information is broad and includes data on Company revenues, financial forecasts, acquisitions, orders, strategic negotiations, company reorganization, clinical trial results, and new product developments or launches.

Safe and Respectful Workplace

The Company is committed to providing a safe workplace where mutual respect and harmony are encouraged. Employees will not face discrimination or harassment based on, but not limited to, religion, gender, age, nationality, disability, or marital status. Employees will not be subjected to unfair treatment and sexual harassment is strictly prohibited.

Conflict of Interest

The Company strictly prohibits employees from using their position for personal gain. If you believe a conflict of interest may arise while performing your duties, please report it to the Company in advance for appropriate handling.

Protection of Company Assets

Employees must protect company assets to prevent loss, damage, or theft. Company assets include both tangible and intangible assets. Employees are prohibited from disclosing, using, altering, distributing, or destroying company assets without authorization.

Financial Reporting

The Company's accounting policies comply with applicable laws and regulations, ensuring accurate and honest record-keeping. Employees must cooperate with internal auditors for appropriate reviews. If suspicious activities are discovered, employees must report them immediately.

Consequences for Violating the Code of Conduct

Employees who violate this Code of Conduct will be subject to corrective actions or penalties in accordance with the Company's Employee Work Rules, while serious violations may potentially lead to dismissal.

Reporting Issues

If you have any questions regarding this Code of Conduct, please first discuss them with your supervisor. Your supervisor is obligated to take action or escalate the issue. If your concern is not resolved, or if your supervisor is involved in misconducts, please escalate the matter to a higher-level supervisor, HR department, or CEO, or raise your concern via the following email:

compliance@ebp.com.tw