

**BioGaia**<sup>®</sup>  
Probiotics grounded in evolution  
Driven by science

# CODE OF CONDUCT



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## **Purpose**

The Code of Conduct has been adopted in order to set standards with which employees at BioGaia must comply. The Code also refers to relevant Group policies where more detailed information about each topic is available.

In cases where local law or customs impose higher standards than those set in the Code, local law and customs should always apply. If, on the other hand, the Code sets a higher standard, it should take precedence.

## **Scope**

The Code applies to all employees of the BioGaia Group (the "Employees"). Agents, consultants and temporary employees are also covered by the Code when they are working for BioGaia..

## **Responsibility**

BioGaia's CEO is ultimately responsible for the Code and, together with Executive Management, must ensure that it is communicated and implemented throughout BioGaia.

It is the responsibility of every manager to lead by example and to provide guidance to the Employees who report to him or her. All Employees are, however, individually responsible for reading, understanding and complying with the Code and referenced policy documents.

Employees who believe that the ethical standards may have been compromised, have a duty to raise their concerns. In addition to the Code, BioGaia has adopted a set of policies that are referred to in the Code and with which employees must also comply.

## **Violations of the Code**

Violations of the Code should be reported to the immediate manager. If that is not possible, a higher- level manager should be contacted. If violations of the Code cannot be addressed with the manager or higher manager or if the employee is not satisfied with the response, the whistleblowing team can be contacted for further guidance. The manager receiving information about a violation of the Code should take further action, even if a senior manager is involved.

If an employee wants to report a suspicion or ask a question anonymously, this this can be done through the company's whistleblower function. The whistleblower will never incur any form of sanction or personal disadvantage as a result of whistleblowing. It does not matter if the whistleblower is mistaken, provided he or she is acting in good faith.

The whistleblower reporting platform can be accessed from the company webpage or by using the following link: <https://report.whistleb.com/en/biogaia>

More information about the whistleblower function can be found in the [Whistleblowing Guidelines](#).

## Healthy workplace

BioGaia should be a workplace that is inclusive, developing and meaningful for the Employees, as well as a place where everyone feels welcome, inspired and safe.

**Diversity** BioGaia should be a workplace with people of many different skills, abilities, backgrounds, cultures and gender. Diversity brings many benefits to the business.

**Equal opportunities** Employment decisions and promotion opportunities should be based on merit alone.

**Discrimination and harassment** BioGaia condemns any form of harassment and discrimination, including such based on characteristics protected by applicable laws and regulations (e.g. race, religion, gender, age, sexual orientation and so on). No form of violence is accepted in the workplace – ever. No employee shall be bullied, intimidated or abused for any reason. Sexual harassment, including unwanted sexual advances or insulting jokes, is never permitted and must be reported if it occurs.

**Health and safety** BioGaia is committed to providing a safe and healthy workplace for all Employees. The workplace should help Employees cultivate and maintain a healthy lifestyle and long-term physical and mental wellbeing.

Unhealthy workloads should be avoided. The workplace should be continuously developed to minimise risk of injuries. Conditions identified that present a safety hazard should be reported immediately to the immediate manager or the person responsible for health and safety at the facility.

All employees, subcontractors and vendors working on BioGaia's premises are expected to identify and understand the risks associated with their work, manage such risks responsibly and only perform work according to the applicable safety rules and for which adequate training has been provided.

Please also review the [Diversity Policy and Work Environment Policy](#)

## Healthy networks

BioGaia's impact along the value chain should be subject to continuous improvement. BioGaia is committed to working to ensure that suppliers and partners adhere to standards of business conduct consistent with those of BioGaia. This entails compliance with laws, regulations, international agreements on human rights and decent working conditions according to internationally accepted labour standards (e.g. ILO). If unethical behaviour and/or non-compliance is found in the value chain, it should be reported and acted upon. Improvements within sustainability (e.g. environment, human rights and working conditions) at BioGaia's suppliers or partners should be recognised and encouraged.

**Research** Partners are encouraged to apply the highest ethical standards in all preclinical and clinical research. The aim is to be as transparent as possible and researchers should always be encouraged to make study results publicly available. In all preclinical and clinical research in which BioGaia is involved, accepted ethical standards must be applied. Thus, in all clinical studies supported by BioGaia, there must be local ethical approval of the study protocol. Further, BioGaia requires that the researchers adhere to the Helsinki Declaration's ethical principles for medical research. Research involving animals must be justified and should only be performed after replacement, reduction and refinement of animal studies have been considered.

Please also review the [Code of Conduct for suppliers/partners of BioGaia AB](#)

## Healthy Business

At BioGaia, business should be conducted in a lawful, ethical and honest way in every territory in which the company is present. Employees should be encouraged to do more than just what is legally required.

**Anti-bribery** Bribes, kickbacks, or unlawful facilitation payments in order to obtain or retain customers, or gain any other kind of business advantage, are never acceptable. If an employee is exposed to such payments, even small amounts, the Legal Department should be contacted.

Modest gifts or entertainment offered by a customer, supplier or other business partner are acceptable provided they are not intended to influence a business decision.

**Interactions with the scientific community** When interacting with the scientific community the highest standards of integrity and honesty must be applied. BioGaia's standard contracts and terms must always be used.

**Conflicts of interest** Conflicts of interest within BioGaia shall be avoided and if identified must be reported. Significant business investments, Board positions, side jobs, or advisory roles at partners/ customers, suppliers or competitors of BioGaia, must receive prior approval from the employee's immediate manager. Employees who have a relative or close friend working for a partner/ customer, supplier or competitor should disclose this to their manager prior to any engagement with this company on behalf of BioGaia.

**Fair competition** Discussions with competitors about pricing, terms of sale or other matters prohibited by law must never occur.

**Creating and managing business records** Business records / information, such as in external reports, should be accurate and reliable, enabling business partners, government officials, investors and the public to trust the information provided.

**Environmental impact** At BioGaia employees should always consider and minimise the environmental impact from business activities. The company's environmental footprint from activities and products throughout the value chain should be limited. If a business partner or supplier is found to act in a way that severely neglects its impact on the environment, this must be reported to the immediate manager. Improvements in terms of sustainability within the company or at the company's suppliers or partners should be recognised and encouraged.

**Travel** When planning travel, the value to the business should be compared to the impact on employees' well-being, total time spent, total costs for the trip and the total environmental impact. Achieving the purpose of the trip through other means should be considered.

Please also review the [Anti-bribery and Anti-corruption Policy](#), [Insider Trading Policy](#).

## Healthy products

BioGaia's products should be developed to be safe, sustainable, of high quality and should always be well documented in terms of safety and efficacy through clinical studies. The social and environmental impact of the products throughout their lifecycle (value chain) should be improved continuously and taken into account in product development projects. Information about the products to partners (customers) and consumers must be accurate and transparent.

## Unified voice

At BioGaia a unified voice means that all communication should be consistent.

Communication is the responsibility of the CEO/Executive Management. Every employee is responsible for following the communication guidelines set out by the CEO/Executive Management.

The CEO is the primary spokesperson for BioGaia. When necessary, the CEO may delegate this responsibility to other functions within the company, preferably a member of Executive Management. If an employee who is not a member of Executive Management is contacted by the media, he or she should refer the journalist/person to a member of Executive Management.

All employees should carefully consider their engagement in social media when acting on behalf of BioGaia.

Please also review the [Communication Policy](#)

## Information security and privacy

At BioGaia data should be managed appropriately.

**Data protection** Confidential information from the company, the Group and third parties should remain confidential.

The privacy of the company's stakeholders (e.g. employees, business partners and consumers) should be safeguarded and applicable data protection regulations should be adhered to, including the General Data Protection Regulation (GDPR), enabling natural persons with whom BioGaia interacts to always feel confident that BioGaia respects and safeguards their privacy.

If business information is mistakenly disclosed, or if there is a suspicion that information has been stolen, the Legal Department should be contacted. In urgent situations concerning digital information, the IT Department should also be contacted for immediate action.

Please also review the [Data Protection Policy](#)

## Revision history

VERSION	DESCRIPTION OF CHANGE
1.0 (September 2020)	