



# The **Ferring** Code of Conduct

*Building families and helping people live better lives*

**FERRING**  
PHARMACEUTICALS

# Chairman's message

The Ferring Philosophy describes our commitment to conducting responsible business in a fair, respectful and ethical manner. This Code of Conduct builds on these principles by clearly defining the expectations for how we engage in business and behave in various situations.

We are dedicated to maintaining the highest standards of integrity in the best interests of our patients, partners, and customers, and to ensuring that Ferring is a safe, rewarding, and supportive place to work.

Our mission is to deliver innovative healthcare solutions, and the ultimate measure of success is the positive impact we have on the lives of patients and communities. Earning and maintaining the trust of those we serve is central to our success and to our continued ability to operate.

This Code serves as a comprehensive guide to help us navigate the complexities of our industry with integrity. It is not just a set of requirements, but a reflection of our ongoing commitment to ethical conduct in every aspect of our work. All those who represent Ferring are expected to adhere to this Code, and we are each responsible for holding ourselves and one another accountable.

Thank you for your essential role in upholding this Code and for fostering a workplace where issues can be openly discussed and addressed. Together, we continue to strive for excellence.

**Jean-Frédéric Paulsen**  
Chairman





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*Building families and helping people live better lives*

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# The Ferring Philosophy

## People come first at Ferring.

*Because this is so...*

### Patients using our products and physicians prescribing them have a right to expect that:

- we will only make available those products in which we have full confidence;
- we will offer the best possible products at the most reasonable cost;
- Ferring's employees will always display courtesy and respect, and act professionally.

Ferring seeks the loyalty of these patients and physicians, and we are prepared to earn this loyalty anew every day.

Ferring expects that its employees will create value for the company and its stakeholders.

### Ferring employees, at all levels, have a right to expect from the company and their colleagues:

- respect, support and encouragement;
- a work environment that is safe, stimulating and rewarding;
- the freedom to make mistakes and to admit to them without fear of retribution;
- that the highest standards of integrity will be maintained at all times;
- that colleagues will never knowingly do anything to compromise their position as Ferring employees;
- that all who represent Ferring will do so in ways that generate respect for the company and its employees.

### Ferring asks its employees to:

- always do what is right, proper and ethical, and encourage your colleagues to do so;
- speak out when you think that wrongs are being committed in Ferring's name;
- be loyal, but only to that which is just, equitable, honourable and principled – and true to the Ferring philosophy.

No statement of principled behaviour can ever cover every situation, or deal with every contingency. It can only set the tone, making each individual responsible for applying that tone to his or her everyday practice.

We strive to set that tone with five simple words:

**People come first at Ferring.**

*This Code serves as a  
detailed guide to help  
us navigate through  
the complexities of our  
industry with integrity*



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# Expectations



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# Following ethical guidelines



**True to the Ferring Philosophy, ethical conduct is fundamental to Ferring's reputation and success.** Everyone has a role to play in upholding our ethical standards by doing the right thing at all times.

This Code is more than a set of rules and guidelines, it includes practical examples to assist representatives of Ferring when they encounter challenging situations.

In addition to this Code, representatives should familiarise themselves with company policies and procedures and seek clarification or guidance as needed.





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## Who the Code applies to



**This Code applies to everyone employed by Ferring or acting on the company's behalf:**

- Ferring managers and directors (including Board Members)
- All employees of Ferring, including temporary and part-time staff
- Contractors, consultants, agents, and any third party acting on Ferring's behalf

The Code refers to these people collectively as **representatives**. All representatives must comply with this Code and do everything possible to prevent any breaches, consistent with relevant laws and company policies.

The Code applies to all of Ferring's sites and subsidiaries globally.



In some countries, there are Employee Handbooks and/or policies setting out local standards in accordance with local laws or business requirements. If this Code conflicts with the Employee Handbook, the Handbook should always take precedence.







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# Your responsibilities











*You must conduct yourself with honesty, integrity and respect for others*



**Ferring's representatives must adhere to the highest standards of ethical and professional behaviour.**

As a Ferring representative, you must:

-  Conduct yourself with honesty, integrity and respect for others.
-  Comply with relevant laws and regulations.
-  Abide by the ethical standards outlined in this Code, the Ferring Philosophy, and company policies and procedures.
-  Seek clarification if you are uncertain about the correct course of conduct.
-  Promptly report any suspected violation.
-  Cooperate fully with internal investigations or legal proceedings.
-  Disclose any actual, potential, real or apparent conflicts of interest.
-  Certain topics covered here may be described in more detail in other corporate policies. Every representative must thoroughly review and understand the company's policies. You should consult your manager if you are unsure whether a specific policy applies.



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# Additional responsibilities for managers



**Managers have additional responsibilities. They must proactively encourage compliance with and prevent violations of this Code, policies, and ethical standards.** Managers must cultivate an ethical culture, encouraging open communication and ‘speaking up’.

General and Site Managers, Function Heads, and all people managers are expected to ‘own’ this Code, and to impart the same sense of ownership to all their representatives.

As a Ferring manager, you must:

- ✓ Lead by example and be a positive role model.
- ✓ Foster a culture where integrity is valued above everything else.
- ✓ Encourage others to follow the Code.
- ✓ Prevent violations of the Code, and report any concerns about potential violations. Disclose any actual, potential, real or apparent conflicts of interest.
- ✓ Provide guidance to representatives.
- ✓ Take seriously any concern raised by a representative that could compromise the Code. Determine if the issue should be escalated, and if so, do this as soon as possible.
- ✓ Create an environment that fosters ethical behaviour, where representatives are comfortable speaking up without fear of retaliation.

*Lead by example and be a positive role model*





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# Disciplinary action



**Failure to comply with this Code, policies, ethical standards and/or applicable laws and regulations could result in disciplinary action.** This could include termination of employment. This applies to all representatives, regardless of their position or level in the company. Disciplinary action may also be taken if managers fail to address misconduct promptly.

Any disciplinary action will reflect the individual circumstances in each case. Action will be taken in accordance with local regulations, and in proportion to the nature and severity of the violation.

In addition to direct violations, the following would amount to a breach of the Code:

- Failure to address misconduct.
- Withholding information when requested to address a potential violation.
- Knowingly making baseless or untrue reports or allegations.



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# Respect and ethical behaviour in the workplace



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# Diversity, equity and inclusion



**We are committed to nurturing a culture that appreciates and promotes diversity, equity and inclusion (DE&I).** We recognise that diversity encompasses a wide range of characteristics, including (among others) race, ethnicity, gender, sexual orientation, age, religion, disability and socioeconomic background.

We believe a diverse workforce brings perspectives and experiences that drive success. That's why we are dedicated to creating an environment where each team member feels valued, respected and empowered to bring their best self to work every day.

In line with our commitment to equity, we strive to eliminate barriers and provide equal opportunities for all representatives to succeed and advance within the company. This includes promoting fair and unbiased recruitment, hiring and promotion practices, and providing equitable access to resources, development opportunities and benefits.



### What should you do?

One of your colleagues has just returned from a foreign trip and makes inappropriate jokes about the different cultures and customs they encountered abroad.

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You may choose to address the situation directly with your colleague, discuss it with someone you trust, or report the issue through the Ferring AlertLine.



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# Harassment, bullying and discrimination



**We are dedicated to creating a work environment where everyone is treated with fairness and respect regardless of their race, ethnicity, gender, sexual orientation, age, religion, disability or socioeconomic background.**

Ferring strictly prohibits all forms discrimination, disrespectful or abusive behaviour, threats, harassment (including sexual harassment), bullying (also known as ‘mobbing’), intimidation and acts of violence.

This commitment to fair and respectful behaviour extends to our interactions with business partners, external stakeholders, and other third parties. All relationships with external entities must be consistent with the values in the Ferring Philosophy. These include mutual respect, fairness, support and professionalism.



If you experience or witness any case of harassment, bullying or discrimination, you must report this immediately to your manager.



If you do not feel comfortable or safe in raising the issue with your manager, contact Human Resources or make a report through the Ferring AlertLine.



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# Health and safety





**At Ferring, we are dedicated to promoting safe and healthy working conditions.** This collective commitment reflects our shared culture of caring for one another. Fostering a culture of health and safety helps to safeguard representatives' wellbeing, nurture a sense of security and trust, and create a positive work environment where everyone can thrive.

As a Ferring representative, you must:

-  Follow specified health and safety practices.
-  Use appropriate equipment.
-  Understand emergency response plans.
-  Proactively report any concerns, including unsafe conditions, accidents, injuries and illnesses.



-  We provide regular training and updates to keep everyone informed and empowered to maintain a safe environment.
-  You can find out more about health and safety at work by reviewing the [Ferring Environment, Health and Safety Policy](#).

## Substance abuse

We have a zero tolerance stance on substance abuse, reflecting our commitment to providing a safe and healthy workplace. We strictly prohibit the use, possession or distribution of illegal substances, including narcotics, hallucinogens or unauthorised prescription drugs. Violations may lead to disciplinary action.

*The health and safety of all is paramount*



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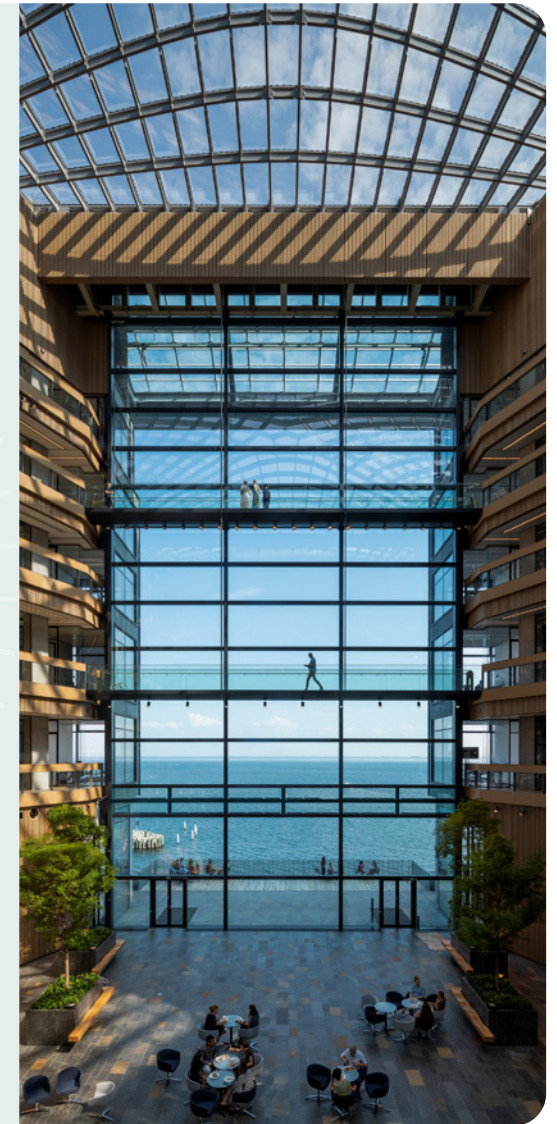
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# Conducting business ethically



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# International business standards



**Competition is a part of business, but it must be done in a compliant way.** In line with our commitment to ethical conduct, representatives must avoid any action that violates laws or regulations.

Representatives are also prohibited from helping others to break rules, whether directly or indirectly. Those responsible for engaging third parties must exercise proper oversight to ensure they abide strictly by this Code when acting on our behalf.

In seeking to fulfil our purpose, we adhere to the legal requirements in the countries where we operate. This Code sets out our international standards for doing business, and applies even to topics not covered by a country's laws, regulations or industry codes.



**i** If this Code is incompatible with your local laws, you must abide by the relevant law and report the matter to a Chief Legal Officer (CLO) representative.

**i** We are committed to observing all applicable export and import laws, including trade sanctions and embargoes. For more information, please refer to the corporate policy on [Trade Sanctions and Export Controls](#).

**What should you do?**

You are invited to an industry gathering and participate in a roundtable with various competitors. Towards the end of the session, there is a discussion on how to prevent price erosion.

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These kinds of discussions could give the appearance of collusion, which is considered an anti-competitive behaviour. Even jokes about joint pricing strategies among competitors could be misinterpreted and reported. You must not participate in any discussion with competitors that could limit free and fair competition. Leave the room, and document your departure in an email to any CLO representative or raise a concern via the Ferring AlertLine.

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**What should you do?**

You hear a rumour that one of your distributors is exporting Ferring products to sanctioned customers.

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You must refer the matter immediately to a CLO representative or raise a concern via the Ferring AlertLine.

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# Anti-bribery and corruption








**It is illegal to offer, give, pay, ask for, or receive anything of value in return for inappropriate advantages.** We will not tolerate bribery or any unlawful or improper payment, fraudulent conduct, kickback, or offer of items of value to or from any public official, government representative, healthcare professional, or other person of influence, on behalf of Ferring.

Ferring is dedicated to conducting business ethically, aligning with anti-bribery and corruption laws in the countries where we operate. This commitment extends to all third parties who we engage to support our business worldwide.



*Ferring will not tolerate bribery or any unlawful or improper payment*

As a Ferring representative, you must NOT:

-  Engage in any form of payment, gift, service, offer of employment, or provision of anything of value, whether direct or indirect, with the intention of influencing the actions of government representatives, representatives of other companies, or individuals in the private sector. This includes grants, donations, offers of employment, or gifts aimed at influencing formulary, purchasing decisions or recommendations, whether to advance Ferring's or your own personal interests.
-  Give anything of value to any stakeholder, if you are involved in government or government-owned tenders and other procurement activities. You must be aware that the accepted culture in one country, including gift giving, may not be lawful or appropriate in another. If there are local cultural norms or traditions whereby exchanging gifts is considered customary as a courteous gesture of goodwill, they must comply with local laws and with conditions set out in the Business Gifts section below.
-  Promise or provide anything of value with the aim of encouraging or inducing any member of the healthcare community to purchase, prescribe, use or recommend our products. Be aware that country-specific rules may apply to samples and items of diminished value.
-  Make any form of 'facilitation payment', i.e. a payment to government officials, or immediate family members of government officials, to obtain, secure or expedite government services. The only exception is if a representative's health or personal security are in imminent danger.
-  For more information on this, consult the [Global Compliance Department](#).

*(continued overleaf)*



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# Anti-bribery and corruption



As a Ferring representative, you must:

-  Be familiar with local requirements, including applicable national laws and regulations concerning bribery and corruption. For example, this could include compliance with global anti-bribery laws such as the US Foreign Corrupt Practices Act (FCPA) and UK Bribery Act.
-  Ferring has a zero tolerance approach to bribery and corruption. If you ever believe that you are being asked to violate this rule, or suspect a violation has occurred, you must promptly notify a CLO representative or contact the Ferring AlertLine.





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# Anti-bribery and corruption



## Political activities and donations

You must not directly or indirectly use or contribute Ferring's funds or assets, including your work time or company equipment, to support a political party, politician, candidate for office, or campaign.

**i** You must not use Ferring's premises or assets to raise funds or to campaign, unless in compliance with country laws and the Group Delegation of Authority Policy (including consultation and approval by the Group Chairman) as in many countries political contributions must be made in the name of an individual.



### What should you do?

In your capacity as a Ferring representative, you are asked to contribute funds to a political party.

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You must not directly or indirectly use or contribute company funds or assets to support a political party.

## Anti-money laundering

Ferring has a zero tolerance stance towards money laundering and tax evasion.

Money laundering is the illegal practice of concealing the origins of an unlawful source of income and disguising the income to give the appearance of legitimacy. This is designed to make unlawfully obtained assets appear legitimate, obscuring the true source of the funds. For instance, processing the proceeds of a sale associated with the payment of a bribe through our bank accounts could be considered money laundering.

Tax evasion is the intentional and dishonest evasion or underpayment of taxes, or assisting with this process.

As a Ferring representative, you must:

**✓** Adhere to laws and regulations that forbid involvement in money laundering and tax evasion.

# Anti-bribery and corruption



*You may not offer, ask, provide or accept anything of inappropriate value either for yourself or others in return for favourable treatment*

## Business gifts and entertainment

All contacts and dealings with external stakeholders must be conducted ethically to avoid violating this Code or any applicable laws or regulations, and to prevent the appearance of impropriety. These stakeholders include current or prospective customers, suppliers, vendors, lenders, competitors, healthcare professionals, healthcare organisations, patients, and patient organisations.

Gifts, meals and entertainment may be used within the terms of this Code, to foster positive working relationships and goodwill with customers, vendors and suppliers. However, these professional courtesies must not be used for bribery or unethical purposes. You may not offer, ask for, provide or accept anything of inappropriate value either for yourself or others in return for favourable treatment.



Specific guidelines are as follows:

### 1 Business meals and entertainment

Providing, hosting, or accepting a modest meal or gift may be acceptable as a business courtesy under certain circumstances.

The item in question must be:

- ✓ Permissible under applicable laws and regulations.
- ✓ Reasonable in nature.
- ✓ Compatible with industry standards and local customs.
- ✓ Serving a genuine business purpose and presented in good faith.
- ✓ Modest and infrequent (i.e. not considered lavish or extravagant by local standards).

The item in question must NOT be:

- ✗ Intended to influence the recipient or attach an obligation to the offer or receipt.
- ✗ Given or received with the intention or potential to influence the recipient's objectivity in making a business decision.
- ✗ You must exercise professional judgment, discretion and integrity to avoid any misinterpretation of good intentions.



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# Anti-bribery and corruption




## 2 Gifts



**Giving gifts:** Ferring will not provide any inappropriate or prohibited gifts to external stakeholders, such as clothing, cash, gift cards, jewellery or electronics. In most countries, professional articles such as scientific books or items with medical utility are acceptable gifts to external stakeholders. Courtesy items such as perishable goods are also generally accepted on special cultural occasions or festivals. Even where gifts are appropriate, they must be infrequent. The amount and frequency will be determined based on the regulations in each country. Additionally, to avoid even the perception or wrongdoing or misconduct, Ferring should never provide any gifts, including appropriate ones, to a stakeholder of influence during, immediately before, or immediately after a decision-making process (e.g. a tender).

 For further guidance, please see the Ferring requirements for your country or contact your Compliance Champion.





### Receiving gifts:

As a Ferring representative, you must:

-  Politely refuse any gifts which are inappropriate or prohibited under this Code.
-  Exercise good judgment, integrity and honesty to avoid even the appearance of a conflict of interest, or any risk of good intentions being misinterpreted when receiving a gift.

If returning a gift is impractical or would be considered an offence to the giver, the gift may be accepted on behalf of the company if it can be shared among representative (e.g. a basket with several articles).

*Internal:*

-  For giving or receiving of gifts between representatives, refer to your local Employee Handbook. In the absence of specific rules, you are not allowed to accept any gift with a market value of EUR 100 or equivalent in local currency.
-  In any case potentially exceeding either the locally approved or EUR 100 threshold, you must disclose this and obtain approval using the [Declaration of Other Interests Form](#).



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# Anti-bribery and corruption



## 3 Hospitality

### Offering:

Ferring may provide acceptable hospitality during legitimate business discussions or educational meetings, up to the amounts permitted by local laws and policies. In the absence of such laws or policies, Ferring will not provide a meal exceeding EUR 150 or its equivalent in local currency under any circumstances.

### Receiving:


Even if acceptable under the laws and policies in your country, hospitality valued at EUR 150 or more must NOT be accepted under any circumstances.

### Internal:

The same threshold must be observed for hospitality offered to representatives.

## 4 Kickbacks and other improper payments

As a Ferring representative, you must NOT:

-  Provide, solicit or accept any kickback or other unlawful payment, whatever the amount, to or from anyone, including any company or government that does business, or wants to do business with Ferring.



### What should you do?

You are negotiating prices with one of Ferring's suppliers. During a break, the supplier offers you a ticket to a football game.

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You are not allowed to accept entertainment under these circumstances. If the tickets are transferrable, you may hold a raffle in the office for any representative to win the tickets.



Any exceptions to any section of this chapter must be approved by Compliance in justifiable circumstances only. You must disclose this using the [Declaration of Other Interests Form](#) to obtain approval.



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# Conflicts of interest








**A conflict of interest can arise when a representative’s personal interests interfere with their ability to do their job effectively and objectively.**


- As a Ferring representative, you must NOT:
-  Engage in any activities that could conflict with Ferring’s business interests, adversely affect the company’s reputation, or interfere with you fulfilling your job responsibilities.
  -  Use your position at Ferring, or Ferring’s information or assets, for your personal gain or the improper benefit of others.

While this Code addresses certain situations where representatives’ personal interests may conflict with those of Ferring, it is important to note that this list is not exhaustive. Representatives must consider all circumstances that could create an actual or apparent conflict of interest, and avoid any situation that could impair their objectivity when making a business decision in the best interests of Ferring. Such conflicts of

interest might derive from external commitments, family ties or close personal relationships, or from accepting inappropriate gifts and invitations.

- Consider these questions when deciding whether a business activity could create a potential conflict of interest:
-  Will this activity or relationship influence my ability to make sound and unbiased business decisions, or otherwise interfere with my ability to do my job?
  -  Will I personally gain something, or will a family member benefit from my involvement in this activity based on my status as a Ferring representative?
  -  Will I be using company assets for personal gain?
  -  Will my participation require me to put my interests above what is best for the company?
  -  Would public disclosure of the activity damage Ferring’s reputation?

As a representative, you are required to declare other interests, which will be evaluated to determine if they pose a conflict of interest. Some potential or apparent conflicts may be accepted if they do not materialise. Actual conflicts of interest require resolution. If left unresolved, Ferring will address them and may take necessary corrective and/or disciplinary action to remedy the issue.

 You must report any actual or potential conflict of interest using the [Declaration of Other Interests Form](#). The form must be completed and submitted for review and approval.





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# Conflicts of interest



## Second job employment

Representatives may be entitled to take a second job if local law permits, and providing this does not conflict or interfere with their role at Ferring after a review for potential conflicts. Representatives are prohibited from engaging in secondary employment or other activities that could conflict with their role at Ferring, or might interfere with their ability to perform their duties.

As a Ferring representative, you must NOT:

**X** Take on a second job that is incompatible with your employment at Ferring due to concerns about conflicts of interest, health and safety, trade secrets, or your commitment to the company.

**i** All second job employment is subject to prior approval. Representatives must inform their manager before taking on secondary employment, and submit a [Declaration of Other Interests Form](#) for approval.

### What should you do?

You work as a marketing manager for Ferring. On weekends, you volunteer at your local community centre, assisting with various activities. Due to your involvement and expertise in community engagement, the community centre invites you to sit on their Board to provide insights and advice on fundraising strategies and community outreach initiatives.

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You are not required to disclose this to the company. There is no conflict of interest in accepting this position, as your role on the Board primarily focuses on non-profit community service and does not involve decision-making that could affect Ferring's business interests.

### What should you do?

As a pharmaceutical scientist specialising in gastroenterology, you are offered a seat on the Board of a biotech startup focused on developing innovative treatments for gastrointestinal disorders. While the startup's mission aligns with your expertise, you are conscious of the potential conflict of interest. Your role on the startup's Board could impact your decisions or access to confidential information in your current job, potentially leading to biased recommendations or data sharing between the companies.

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You must disclose the matter through the [Declaration of Other Interests Form](#) to obtain approval before accepting such second job employment.



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# Conflicts of interest



## Business opportunities

You must not sell your own services or products, or those of another person or firm, if Ferring offers similar services or products.

## Personal or family business with Ferring

In general, you must not conduct Ferring business with family members or with a business in which your family members have an interest, unless exceptionally approved. You must not sell goods or services to Ferring beyond the stated or implied scope of your employment.



For questions or approval of exceptions, you must disclose the matter through the [Declaration of Other Interests Form](#).



### What should you do?

Your sister is employed as a project manager at a supplier that is bidding for a contract with Ferring. You are part of the team who will select the new provider.



You must disclose the matter through the [Declaration of Other Interests Form](#) to obtain approval.



### What should you do?

The person you've been dating sees a job advertisement for a position at the same manufacturing plant where you work, but in a department you don't interact with often. They have the right skills for the role and decide to apply. You submit a referral for the position.



Both you and the applicant must disclose the situation. As the employee, you must disclose it using the [Declaration of Other Interests Form](#) to obtain approval, while the applicant must disclose it during the interview process.



# Conflicts of interest



## Boards of Directors and Advisory Boards of other for-profit companies

You must not become an officer, or member of the Board of Directors, or member of an Advisory Board of another company, no matter its size or the nature of its business, without prior approval from Ferring. Generally, Ferring will only grant approval if there is a compelling business reason. A representative is only allowed to hold one position in a for-profit company without prejudice to another potential conflict in a non-profit (see below).

## Boards of Directors and Advisory Boards of not-for-profit companies and organisations

In principle, Ferring supports and will positively consider any request for approval of a non-paid position as an officer, member of the Board of Directors, or member of an Advisory Board of a not-for-profit or trade-related company, providing this suits Ferring's interests.

Before becoming an officer of a for-profit or not-for-profit company, Ferring representatives must:

- ✓ Obtain approval from their line manager and HR business partner and then submit a [Declaration of Other Interests Form](#). All approvals are conditional and tied to the circumstances disclosed. If there is any change in circumstances, a new disclosure is required.

Even if a position is approved (whether at a for-profit or not-for-profit company), Ferring representatives must:

- ✓ Perform work for the other company outside their normal working hours or on vacation days.
- ✓ Conduct any outside activity at their own expense.

In this situation, Ferring representatives must NOT:

- ✗ Use any of Ferring's assets (including equipment) to perform work outside the company.





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# Conflicts of interest



## Direct or indirect interest in suppliers, customers and competitors

A conflict of interest may arise if a representative has a direct or indirect interest in an organisation that is engaged in business with Ferring, or seeking to do so, or acting in direct competition.

The following rules apply to share ownership:

- Representatives are restricted from investing in or owning shares in any company considered a competitor, supplier, or customer of Ferring to the extent that this causes a material conflict. If these shares were held prior to employment with Ferring, this must be disclosed. There is no obligation to sell these shares obtained before starting employment with Ferring.

- As an exception to this rule, a representative can own shares in privately held companies up to a total value of EUR 10,000 or equivalent in local currency. Disclosure is still required if these shares are in a competitor, supplier or customer of Ferring.

- For most publicly traded companies, no disclosure or approval is necessary if the ownership does not surpass one percent of the shares and/or does not entail controlling power. Disclosure is still required if these shares are in a competitor, supplier or customer of Ferring.

This is summarised in the decision tree overleaf.



**What should you do?**

You are interested in acquiring shares in a privately-held company to the value of USD 9,500.

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You are permitted to own shares in a privately held company up to a total value of EUR 10,000 or equivalent in local currency. Disclosure is only required if the privately held company is a competitor, supplier or customer of Ferring.



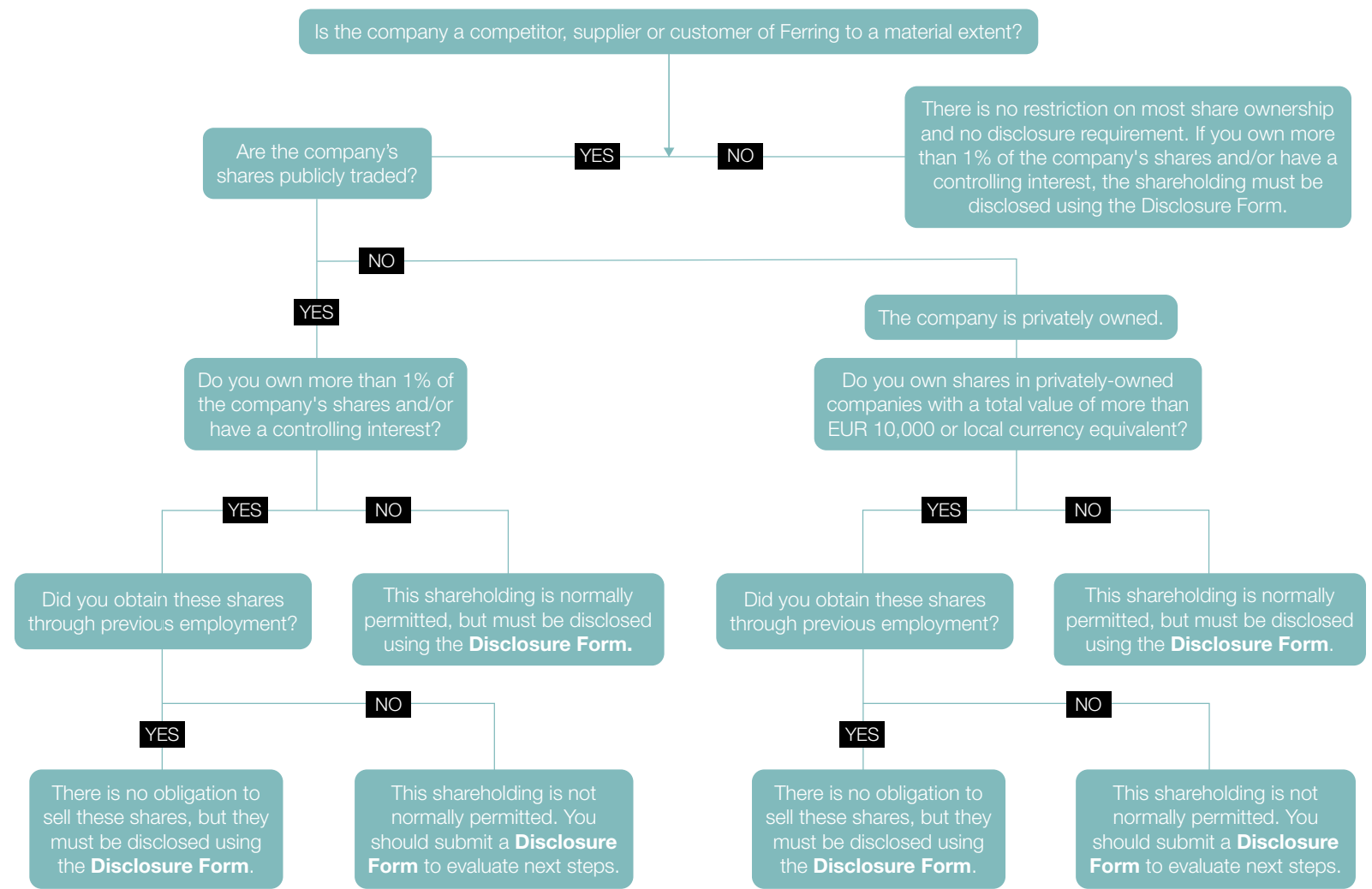
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# Conflicts of interest



 If required, you must submit a **Declaration of Other Interests Form** to obtain approval from the Global Compliance Officer.

## Conflict of Interest – Shareholding Decision Tree





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## Data protection and privacy


**Ferring is committed to safeguarding the privacy and personal data of all its representatives and anyone else with whom we conduct business.** Personal data includes any information that could be used to directly or indirectly identify an individual.


All representatives' and other third parties' data must be protected and used in accordance with the Global Privacy Framework. This requires:

- Transparency in the collection and use of personal data.
- Documentation of data protection compliance.
- Assessments of suppliers' systems and business processes.
- Conducting privacy risk assessments.

*All representatives' and other third parties' data must be protected and used in accordance with the Global Privacy Framework*



 Any data breach must be reported using the [Data Subject Contact Form](#).

 For more information, refer to the [Global Privacy Policy](#).



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# Marketing and promotion of products



**Ferring markets its products in compliance with all applicable local laws and regulations, ethical standards and industry practices.**

This also applies to promotion of our products, such as detailing to physicians and other interactions with external stakeholders, including at meetings and events.



### What should you do?

A colleague is working on some content relating to our products and is unsure whether this needs to be reviewed by the Legal, Medical & Regulatory (LMR) process in Veeva PromoMats, because the materials are scientific and unbranded.

Q

...

You must promptly contact the LMR team assigned to your affiliate/site to ask if the content requires LMR review in Veeva PromoMats.

A

**Don't just assume, ask!**

### What should you do?

A colleague is organising a meeting with doctors relating to our products and is unsure whether this needs to be reviewed and approved in Compliance systems.

Q

...

You must promptly contact the Compliance team assigned to your affiliate/site to ask if the content requires Compliance approval.

A

**Don't just assume, ask!**

All Ferring representatives must follow these rules:

✓ Promotional discussions and information used or distributed must be complete, accurate, and not misleading.

✓ All product materials and messages must be fully substantiated with appropriate data and accompanied by prescribing and safety information.

✓ All product claims must be consistent with country-specific approved labelling and prescribing information.

✓ When discussing Ferring products, always provide accurate, complete and balanced safety information.

✓ Respect the professional judgment of physicians when treating their patients.



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## Anti-trust and fair competition




**Ferring is committed to fair competition and respecting free markets within the bounds of the law.**

As a Ferring representative, you must NOT:

-  Engage in any form of anti-competitive activity, including price fixing or other unfair trade practices that restrict competition.
-  Directly or indirectly engage in discussions or agreements with competitors in areas such as pricing, costs, marketing, supply chain, discounts etc.
-  Enter into any agreement (verbal or written) with competitors, suppliers, distributors, retailers or other third parties that could limit fair competition.
-  Abuse a dominant position in a particular market.



 For questions on anti-trust and competition laws, contact your local CLO point of contact.





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# Financial integrity





**We value the honest, complete and timely recording of financial and non-financial information in compliance with global policies and procedures.**

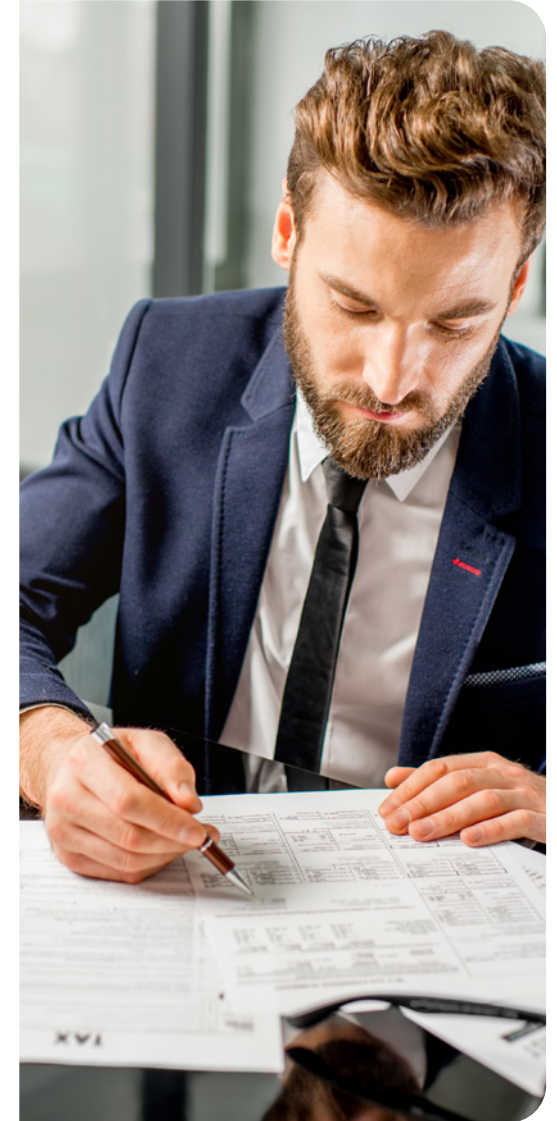
For this reason, we maintain strong internal controls to ensure the accuracy, completeness and reliability of Ferring's accounting records.

As a Ferring representative, you must:

-  Communicate accurately and truthfully with one another, our customers, internal and external auditors, government agencies, and other third parties.
-  Prepare records with integrity so they contain full and accurate information without any omissions, distortions or misrepresentations.

As a Ferring representative, you must NOT:

-  Falsify or forge any business records, such as invoices, expense reports, contracts or performance evaluations.
-  Any discrepancy in records must be corrected promptly and transparently to whoever needs to be informed, e.g. your manager or the relevant Finance Department.



*All internal and external communications must be accurate and truthful*



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# Environmental and bioethical Integrity



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*Environmental  
goals can be  
achieved by  
working together*





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**The Ferring Philosophy says we must always do what is right, proper and ethical.**

This means caring about the way we do business, and achieving success through ethical and sustainable practices and decision-making. We strive to create value through our business, to positively impact the communities in which we operate, and to protect the environment for future generations.

We have adopted an integrated approach to sustainability so this is embedded into our core operations and business processes. We also focus on social impact initiatives to support our mission and help people build families and live better lives, wherever they are in the world. Our sustainability strategy is based on three pillars:

**Purpose, People, Planet.**

**What should you do?**

You have been invited for a two-hour meeting that requires a long-haul flight. Should you decline and propose an online meeting or reserve a flight?

Q

A

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Decline.

Wherever possible, replace short in-person meetings that require significant travel with online meetings to reduce greenhouse gas emissions.



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## Environmental responsibility



**We encourage representatives and stakeholders to engage in sustainable practices, recognising the importance of reducing the environmental footprint from our own operations and throughout the value chain.** This includes reducing greenhouse gas emissions, conserving energy, and effectively managing waste and water. Through environmental stewardship, we aim to continually improve environmental excellence, minimise our impact on the planet, and foster a healthier, sustainable future. Prompt reporting of environmental concerns reflects our responsible approach. We regularly review environmental policies and practices to identify opportunities for improvement and innovation. By working together, we can achieve our environmental goals and uphold our corporate values and responsibilities.

*We aim to improve environmental excellence, minimise our impact on the planet, and foster a healthier, more sustainable future*





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# Product quality and safety




*Any adverse drug events must be reported immediately*

**Ferring is committed to developing, manufacturing and commercialising safe and effective products and services that meet the needs and expectations of patients, customers, regulators and healthcare professionals.**

Once approved, Ferring products are continuously monitored through the collection and review of customer feedback and adverse event reports worldwide.




Every Ferring representative is accountable for ensuring product quality and patient safety by complying with relevant regulations, registration files, codes and standards.

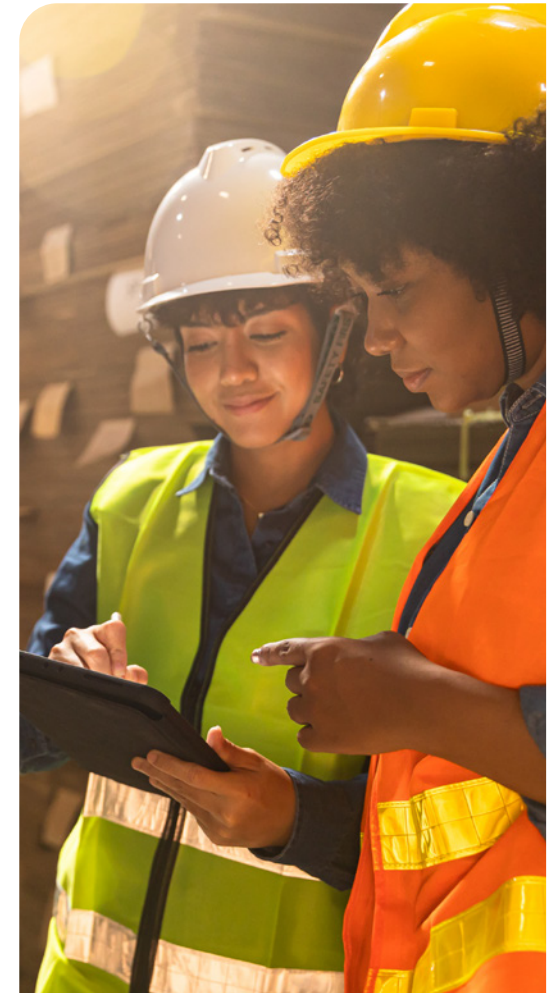
 You must promptly report any adverse drug events of which you become aware to Ferring's Pharmacovigilance Service, including any reports that may be associated with Ferring products.

## Pharmacovigilance and device reporting

All Ferring representatives receive annual training in pharmacovigilance and device vigilance. This involves reporting and analysing safety information to protect patients and users from harm resulting from the use of Ferring products.

As a Ferring representative, you must:

-  Complete the training in pharmacovigilance and device vigilance.
-  Equip yourself with the necessary knowledge of correct procedures.
-  If you become aware of any safety information associated with a Ferring product, you must report this within 24 hours to your local safety officer or [Global Safety](#).






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# Healthcare and the clinical community



### Commitment to bioethics

**The Ferring Philosophy says we must always do what is right, proper and ethical.** Ferring's reputation as an ethical company rests partly on our commitment to maintaining high standards of bioethics. According to our Bioethics Policy and related specific policies, you must act ethically when conducting Ferring's business and making business decisions that have a potential impact on people, animals or the environment.

 More information on our [Bioethics Policy](#) can be found on the [Global Bioethics Intranet](#) site.





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# Healthcare and the clinical community



## Ethical research and development

**We conduct research and development (R&D) according to high bioethical standards and in compliance with relevant regulatory requirements.** These include (among others):

- Standards set out in the Declarations of Helsinki and Taipei.
- Council for International Organizations of Medical Sciences (CIOMS) guidelines.
- European Convention on Human Rights and Biomedicine (Oviedo Convention).
- International Council for Harmonisation (ICH) guidelines (e.g. Good Clinical Practice, Good Laboratory Practice, etc.) These guidelines inform Ferring’s internal policies and standard operating procedures (SOPs) governing R&D.

As a Ferring representative, you must:

- Comply with applicable policies and procedures, and with relevant aspects of external guidelines that are not detailed in Ferring’s internal documents.
- Comply with the requirements relating to laboratory animal welfare and data outlined here in this Code.

## Animal welfare

**Ferring uses experimental animals in R&D and quality control.** We are committed to the principles of the “3Rs”:

- Reduce the number of animals we use, where possible.
- Replace the use of animals with validated alternatives, where possible.
- Refine procedures to minimise animal pain and suffering.

We are committed to ensuring that animals are treated according to relevant animal welfare requirements. We recognise the Marseille Declaration on the worldwide implementation of high standards for animals used by the industry for scientific purposes. We aspire to meet the Declaration’s expectations for animal welfare practices at our own sites, and by external partners worldwide using live animals to conduct studies on our behalf.







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# Healthcare and the clinical community



*We must share accurate, balanced and timely information about our products*

## Scientific integrity and exchange

**Scientific exchange is an important element of Ferring's business.** This means preparing and sharing accurate, balanced and timely scientific information about our products. We strive to ensure complete and balanced disclosure during these exchanges.

It is important to protect the integrity of our medical and R&D processes. We are committed to participating in scientific exchanges that are not promotional in nature or intent.

Scientific misconduct is strictly prohibited. This might include fabrication, falsification, omission of relevant information, or plagiarism in proposing, conducting or reporting research and associated data.

## Data integrity

Data integrity is key to business operations, innovation, scientific and medical advancement, patient safety, and improving healthcare.

As a Ferring representative, you must:



In line with the Data Ethics Policy, maintain high standards of integrity when collecting, analysing, storing, sharing or otherwise using all forms of data, where the use of such data could potentially benefit or harm individuals or society.



Comply with applicable laws and regulations across all the jurisdictions where any of these activities take place.



More information can be found on the [Global Bioethics Intranet site](#).





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# Human rights commitment



*We must respect and protect the dignity and human rights of all*



**Ferring recognises that human rights are basic rights and freedoms that belong to everyone.** We are committed to respecting human rights in accordance with internationally recognised principles. You are expected to respect and protect the dignity and human rights of all individuals.

Ferring complies with local labour and human rights laws in all the countries where we do business. We prohibit the use of forced or child labour throughout our operations.



You can find out more by reviewing the [Human Rights Statement](#).



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# Managing information and assets



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## Insider trading




**Insider trading means buying or selling a company's shares while in possession of material non-public information that could influence the value of those shares.**

As a Ferring representative, you must NOT:

-  Buy shares directly or indirectly in a company while in possession of material non-public information about that company.
-  Pass on material non-public information in any form, including tips or rumours about any company, to anyone who might trade shares while aware of such information.

These rules apply to the shares of any third party with which Ferring is in dispute or negotiation, including potential acquisition.

-  For general rules on share ownership, see 'Direct or indirect interest in suppliers, customers and competitors' on [page 28](#) above.





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## Appropriate retention of records



**Records must be retained and produced promptly upon instruction if there is a possibility of litigation, or an internal or external investigation involving any record in a representative's possession or under their control.**

As a Ferring representative, you must NOT:



Destroy, conceal or alter records for as long as required to comply with applicable laws and Ferring's record retention guidelines.

*You must retain records if there is a possibility of litigation or investigation*



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# Protecting Ferring's intellectual property (IP)



Sensitive or confidential information is crucial for maintaining competitive advantage. Intellectual Property (IP) laws are designed to safeguard creations and inventions, including non-public ideas, strategies, and other kinds of business information, by protecting them from unauthorised disclosure.

As a Ferring representative, you must:

- ✓ Protect the confidential and business information of Ferring but also of its customers, suppliers, and other business partners.

As a Ferring representative, you must NOT:

- ✗ Give, share or make available any sensitive or confidential information to any third party without proper authorisation under confidentiality agreements.

## What should you do?

During your commute to the office on the train, bus etc., you sometimes make work-related calls or open your laptop without a privacy screen. One day, a colleague who was on the same train asks persistent questions about the submission of a new product to the authorities for marketing approval.

Q

A

...

You must be careful to avoid discussing non-public company information in public places, such as in trains, taxis, elevators, or at airports or conferences. If you need to make a telephone call for business purposes in a public place, always be mindful of your surroundings. The same applies to printed documents and the screen of your laptop or smartphone.





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# Government inspections and requests




*Inform Compliance and/or Legal immediately if you receive any government inquiry*





In the event of a government inspection or request, Ferring representatives must:

-  Cooperate fully by providing accurate information promptly and without obstruction.
-  Maintain a positive and cooperative environment for inspectors throughout the inspection process.

As a Ferring representative, you must NOT:

-  Make false or misleading statements to any government official following a request for access to Ferring's premises, or in response to an inquiry, subpoena or other legal document. In some jurisdictions, false or misleading statements during an inspection can lead to individual penalties.

 It is essential to notify CLO immediately upon receiving any government inquiry, to ensure proper support and compliance with legal obligations.

 For more information, refer to the [Responding to an Unannounced Inspection Policy](#).



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# Care and proper use of company assets, including IT systems



You must protect Ferring’s assets against threats such as damage, misuse, loss or theft. This includes tangible and intangible property and reputation, as well as financial assets.


Unless otherwise specified, information technology (IT) systems, the internet, email, and other applications are provided for business purposes only.



As a Ferring representative, you must:

-  Use Ferring’s approved electronic communications and email accounts for all business communication, both internally and with external third parties.
-  When sending or receiving electronic communications and attachments, apply the same standards of care as in hard copy communications.
-  Return all Ferring property and equipment, including all information stored on them, upon request by Ferring as well as on termination of employment.



As a Ferring representative, you must NOT:

-  Abuse Ferring’s IT systems, internet access, email accounts, or any other information and communication media to create, send, search for, download, display or receive illegal, inappropriate, offensive, disruptive or discriminating material.

-  As permitted by applicable laws, Ferring may monitor the use of company IT systems, property and communication devices to address specific needs, and has the right to revoke privileges as deemed appropriate to protect the organisation and its interests.
-  Learn more by reviewing the [IT Acceptable Use Policy](#).










## Social media






*When using social media, you represent Ferring through your actions and words*

**As a representative of Ferring, your actions and words represent the company, even on personal social media accounts, and regardless of your intention when posting, liking or commenting.** Users of social media will make no distinction between your personal and business profiles. Remember anyone can access the content you post online, and whatever you post now may be available indefinitely worldwide. Consider including a statement on your social media profile stating that all views expressed are your own.

As a Ferring representative, when using social media you must:

-  Maintain a professional presence at all times.
-  Comply with all applicable local and industry codes – especially when deciding whether to interact with content on Ferring channels from other countries and global corporate profiles.
-  Complete any local social media training.
-  Share only publicly available information if posting about Ferring.
-  Report any mentions of adverse events involving Ferring products to your local Safety Officer or Global Safety within one working day.
-  Respect copyright and trademarks (including for images and photos).
-  For more information, refer to Ferring's internal corporate policies on medicinal products and medical devices.

As a Ferring representative, you must NOT:

-  Mention or show photos of Ferring (or third party) products or packaging in any social media posts.
-  Engage with or link to content that mentions Ferring (or third party) products.
-  For more information, refer to [corporate guidance on personal social media use](#).





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# Speak up



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## Reporting concerns



At Ferring, we recognise the importance of 'speaking up', and encourage representatives and others to report any concerns about potential misconduct. We value open communication and are committed to maintaining a culture where everyone feels empowered to raise concerns without fear of retaliation. Your willingness to report issues is crucial in maintaining a culture of accountability and trust within the company.

If you are a manager, you have an additional responsibility to lead by example and report issues identified by yourself or your team.

### What you should report

We encourage everyone to speak up and raise concerns about potential violations of this Code, policies or laws. You should report any concerns relating to unethical behaviour, conflicts of interest, fraud, harassment, discrimination, or any other misconduct that you observe or experience.



For a comprehensive list of matters that should be reported, refer to our [Global Speak Up Policy](#).





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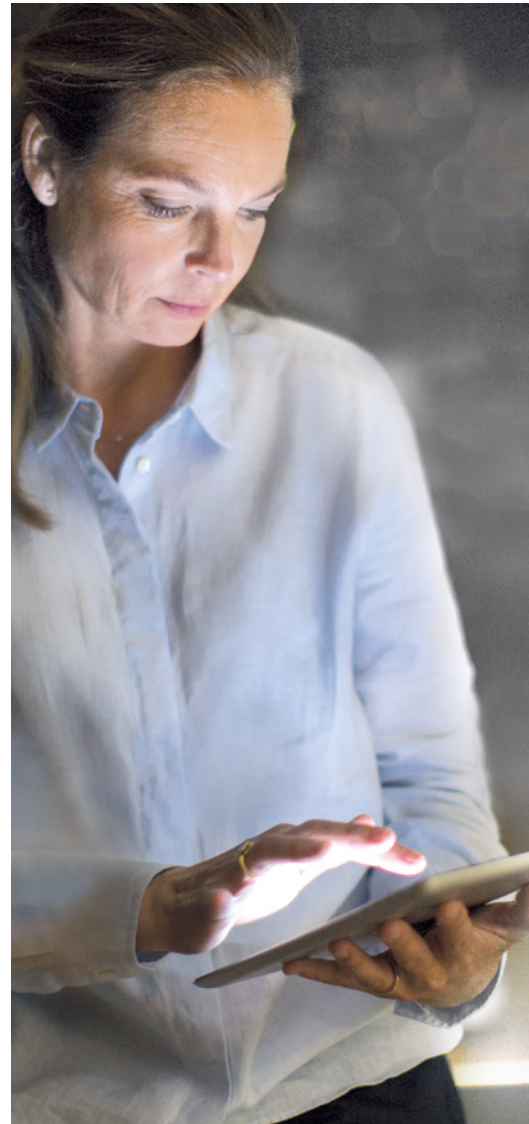
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# Reporting concerns

## How to raise a concern

**There are many ways to speak up if you have a question or concern.** As a Ferring representative, you should use whichever of these methods is most convenient:

-  Your line manager is typically your first point of contact
-  If you are uncomfortable about speaking to your manager, other channels include:
  - Your manager's manager
  - A member of senior management
  - Local or Global Human Resources
-  Alternatively, concerns can be reported to:
  - Global Legal
  - Global Compliance Office: [globalcompliance@ferring.com](mailto:globalcompliance@ferring.com)
  - Global Ethics Office: [geo-geo@ferring.com](mailto:geo-geo@ferring.com)
  - Global Privacy Office: use [Data Subject Contact Form](#)
  - [Declaration of Other Interests Form](#)
-  Concerns can also be reported anonymously 24/7 using the Ferring AlertLine:
  - Online portal: [www.ferring.ethicspoint.com](http://www.ferring.ethicspoint.com)
  - Telephone: local phone numbers can be found at the above link.
  - Information and instructions for using the Ferring AlertLine are available on our intranet and at all Ferring sites globally.
-  Local reporting channels are also available in countries covered by the EU Whistleblower Directive.
-  If you have any questions, contact your local Compliance Champion or the Global Compliance Office via email at [globalcompliance@ferring.com](mailto:globalcompliance@ferring.com)



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## Reporting concerns



### Anonymity

You may remain anonymous when using the Ferring AlertLine. However, local laws in some countries discourage or prohibit anonymous reporting, or restrict the scope of topics that can be reported in this way to finance, auditing, accounting, banking, anti-bribery and related matters. All information submitted to the Ferring AlertLine will be treated as confidential and will only be shared with those who need to know.

### Response to reports of potential violations

Ferring will investigate all reported potential violations promptly and with the highest degree of confidentiality possible under the circumstances. Following investigation, if we decide a violation has occurred we will take any action that is appropriate and required by law. This could include disciplinary action or prosecution of the parties involved. Disciplinary action will depend on the circumstances and could include contractual termination. The company investigates all allegations and will take decisive action, although this may not be apparent to others within the organisation.

### Cooperating with investigations

We expect all representatives to cooperate fully with any investigation we undertake in response to reports of potential violations. Your cooperation is essential in ensuring we uphold our commitment to ethical conduct.

By speaking up and actively participating in our compliance efforts, each representative contributes to the success and sustainability of Ferring. We encourage open communication, reaffirming our commitment to ethical conduct and integrity in all aspects of our business operations.





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## Non-retaliation



*Ferring will not tolerate retaliation against anyone reporting a potential violation in good faith*



Ferring will not engage in or tolerate any retaliation against a representative who reports a potential violation of this Code in good faith, or cooperates with an investigation into reported misconduct. However, a representative must not file a report which they know, or should know, to be false. In this case the representative will be subject to appropriate discipline, possibly including termination of employment.

A close-up photograph of a family of three. A woman on the left, a man on the right, and a young girl in the center are all smiling and looking towards the right. The woman is wearing a light blue sweater, the man is wearing a blue and white checkered shirt, and the girl is wearing a white lace top. The background is a soft, out-of-focus light color.

*This Code serves as a detailed guide to help us navigate through the complexities of our industry with integrity. More than a set of obligations, it is a reflection of our commitment to ethical standards in all aspects of our work.*