

 Nouveaux Pharma Limited (NPL)	Code of Ethics	Document ID:	WW/ERC/SOP/0001
		Reference No:	N/A

“Code of Ethics”

Fostering Ethical Business Conduct (FEB)

Fostering Ethical Business Conduct involves creating a workplace culture where integrity, fairness, and responsibility are paramount

Corporate Policy & Code of Conduct

nouveauxX

 Nouveaux Pharma Limited (NPL)	Code of Ethics	Document ID:	WW/ERC/SOP/0001
		Reference No:	N/A

Our Code of Ethics

Our Code of Ethics reflects our commitment to conducting business with integrity, transparency, and accountability. It serves as a guiding framework for how we interact with colleagues, customers, partners, regulators, and the communities we serve. Through this Code, we affirm our responsibility to uphold the highest ethical standards in all aspects of our work.

By adhering to this Code of Ethics, we reinforce a culture where ethical behaviour is expected, valued, and rewarded. Each employee has a responsibility to uphold these principles, raise concerns when necessary, and contribute to a workplace built on mutual respect and integrity.

Purpose of the Code

The purpose of this Code is to:

- Provide clear expectations for ethical and professional conduct
- Promote compliance with applicable laws, regulations, and industry codes
- Strengthen trust among employees, stakeholders, customers, partners, and communities
- Prevent misconduct, conflicts of interest, bribery, fraud, and other unethical behaviours.

Scope and Applicability

The **Corporate Code of Ethics** applies to all individuals who act on behalf of the organization in any capacity. This includes:

- **All employees and senior leadership**, full-time, part-time, contractual, probationary, and temporary staff
- **Third parties**, including suppliers, contractors, consultants, distributors, and other external partners acting on the organization's behalf
- **Interns, trainees, and volunteers** working within any function of the organization

This Code applies across all organizational locations, business units, and operational environments. It governs conduct during all business activities, including interactions with colleagues, customers, healthcare professionals, regulators, government bodies, business partners, and the communities we serve.

All individuals falling under this scope are required to:

- Understand and comply with the Code and related policies
 - Demonstrate ethical behaviour consistent with organizational values
 - Seek guidance when uncertain about expectations
- Report misconduct or violations through designated channel.

 Nouveaux Pharma Limited (NPL)	Code of Ethics	Document ID:	WW/ERC/SOP/0001
		Reference No:	N/A

Our Commitment to Ethical Standards and Anti-Bribery

Our commitment to transparency, fairness, and accountability guides every decision and interaction within the organization and beyond. Our values drive ethics and integrity in every action we take, guiding us to make responsible decisions and work collectively toward a healthier, more sustainable society delivering **tomorrow's innovation, today.**

We maintain a strict **Anti-Bribery and Anti-Fraud conduct**, prohibiting any form of bribery, corruption, or fraudulent activity. Offering, soliciting, or accepting bribes, whether in cash, gifts, Favors, or services is strictly forbidden. Fraudulent acts, including misrepresentation, falsification of records, or misuse of company resources, will not be tolerated under any circumstances.

Fostering ethical business practices

By fostering a culture of trust and responsibility, we aim to protect our reputation, safeguard stakeholder interests, and contribute positively to society.

Fostering ethical business practices entails cultivating an organizational culture grounded in integrity, transparency, and accountability. It requires strict adherence to legal and regulatory standards, equitable treatment of stakeholders, and disciplined decision-making. By upholding these principles, organizations enhance credibility, strengthen stakeholder trust, and ensure sustainable, responsible corporate conduct.

Our values

Our values drive ethics and integrity in every action we take, guiding us to make responsible decisions and work collectively toward a healthier, more sustainable society by tomorrow's innovation, today.

- | | |
|--|--|
| • Purpose-Led Innovation | • We challenge the status quo to bring breakthrough global science to patients who cannot wait. |
| • Integrity and Trust | • We earn confidence by doing what is right, transparently, every time. |
| • Excellence in Science and Execution | • We uphold the highest standards in medical, scientific, and operational execution. |
| • Speed with Accountability | • We move fast where it matters and take ownership end-to-end. |
| • Collaboration | • We lead the way but never walk alone. We work as ecosystem partners to expand sustainable access for patients. |

 Nouveaux Pharma Limited (NPL)	Code of Ethics	Document ID:	WW/ERC/SOP/0001
		Reference No:	N/A

How These Values Guide Decisions

- **Purpose-Led Innovation**
This value ensures that decisions are driven by patient needs and long-term impact rather than convenience or short-term gain. When evaluating options, teams prioritize solutions that advance meaningful scientific progress and deliver real benefits to those who depend on timely, breakthrough care.
- **Integrity and Trust**
Integrity serves as a filter for every decision. If an action cannot be justified openly and ethically, it is not pursued. Transparency, honesty, and compliance shape choices helping avoid conflicts of interest, ensuring accurate reporting, and maintaining trust with stakeholders.
- **Excellence in Science and Execution**
This value ensures that decisions meet the highest standards of quality, evidence, and rigor. Whether approving research, allocating resources, or assessing operational risks, teams choose approaches backed by data, scientific validity, and precise execution.
- **Speed with Accountability**
Decisions are made quickly where urgency matters without sacrificing responsibility. Employees take ownership for outcomes, weigh risks proactively, and balance speed with due diligence. This ensures efficient progress while maintaining high ethical and operational standards.
- **Collaboration**
This value ensures decisions consider diverse perspectives and stakeholder impact. Teams actively seek input, build alignment, and co-create solutions with partners. Collaborative decision-making prevents silos, reduces blind spots, and leads to more sustainable, patient-focused outcomes.

Our Dedication to Patients and Communities

Our organization is anchored in a steadfast commitment to safeguard, honor, and enhance the wellbeing of the patients and communities who depend on us. The pursuit of improving and extending human life defines our purpose and guides our strategic direction, operational decisions, and ethical responsibilities. Every action we take reflects our dedication to advancing health, building trust, and ensuring that patient welfare remains our foremost priority.

○ **Equitable Therapeutic Access**

We strive to broaden responsible, timely, and sustainable access to high-quality, innovative treatments, ensuring that individuals receive the therapies they need without unnecessary barriers.

 Nouveaux Pharma Limited (NPL)	Code of Ethics	Document ID:	WW/ERC/SOP/0001
		Reference No:	N/A

○ **Uncompromising Patient Safety Standards**

We maintain rigorous safety, quality, and compliance measures across all functions. Protecting individuals from harm is a foundational obligation, upheld through vigilant monitoring, transparent communication, and adherence to global standards.

○ **Engagement with Patient Perspectives**

We actively incorporate the insights, experiences, and expectations of patients into our development, decision-making, and service strategies. Their voices help shape programs that are relevant, respectful, and responsive to real needs.

○ **Ethical Stewardship in Scientific Research**

We are committed to advancing scientific research with the highest standards of integrity, rigor, and responsibility. Our pursuit of new knowledge and medical innovation is grounded in ethical principles that ensure transparency, respect, and accountability. Every research activity is guided by our duty to safeguard participants, uphold scientific credibility, and contribute to improved health outcomes and societal wellbeing.

Valuing and Supporting Our People

Our people each bringing diverse perspectives, specialized expertise, and unique experiences constitute the core strength of our organization. Their dedication and skill enable us to deliver transformative innovations, enhance our operational capabilities, and achieve excellence across the entire value chain. Upholding our organizational values, including an unwavering commitment to integrity, is essential to cultivating trust within the organization and with the broader society we serve. Our commitment to valuing and supporting our workforce is reflected in the following principles:

○ **Cultivating a Supportive Organizational Culture**

We are committed to maintaining an inclusive, respectful, and empowering environment in which all individuals can thrive, contribute meaningfully, and realize their full potential.

○ **Ensuring Equitable Employment Practices**

We adhere to fair, transparent, and merit-based employment processes. Discrimination, harassment, retaliation, or any form of inequitable treatment is strictly prohibited and will not be tolerated.

○ **Safeguarding Health, Safety, and Wellbeing**

We prioritize the physical, psychological, and emotional safety of our workforce by upholding rigorous health and safety standards and promoting a culture founded on care, responsibility, and proactive risk management.

 Nouveaux Pharma Limited (NPL)	Code of Ethics	Document ID:	WW/ERC/SOP/0001
		Reference No:	N/A

○ **Responsible Management of confidential Information**

We require all employees to protect confidential, proprietary, and non-public information entrusted to them. The misuse of insider information for personal benefit or any activity that contravenes legal, regulatory, or ethical obligations is strictly forbidden.

Our Commitments to Business and External Partners

We are committed to conducting all business activities with the highest standards of integrity, professionalism, and accountability. Ensuring a reliable and ethical supply of medicines to meet patient needs remains a fundamental obligation. Adherence to applicable laws, regulations, industry codes, and internal policies constitutes the foundation of our license to operate and is central to maintaining the trust of patients, partners, regulators, and society.

We recognize that ethical considerations may arise in the course of our operations. We therefore commit to addressing such matters promptly, responsibly, and transparently. This commitment ensures that our conduct consistently aligns with the best interests of patients, stakeholders, and the broader community.

Our responsibilities toward business partners and external stakeholders encompass the following principles:

○ **Operational Continuity and Crisis Governance**

We maintain comprehensive systems and controls to safeguard uninterrupted operations and ensure organizational resilience in the face of crises, protecting both patient access and business integrity.

○ **Financial Accountability and Integrity**

We uphold rigorous financial governance, transparent reporting, and responsible management of assets to comply with regulatory requirements and maintain the confidence of stakeholders.

○ **Fair Competition and Anti-Trust Compliance**

We conduct business in strict accordance with competition laws and uphold fair, ethical market practices, avoiding behaviours that could distort or undermine the competitive environment.

○ **Customs, Trade, and Regulatory Compliance**

We ensure that all commercial and trade activities, manufacturing, sale and promotion adhere to requirements of regulatory authorities, customs laws, and other applicable local and global regulatory frameworks.

○ **Prevention and Detection of Fraud**

We enforce a zero-tolerance policy toward fraud, including misrepresentation, falsification of information, or misuse of company resources, and maintain robust mechanisms for prevention, detection, and reporting.

 Nouveaux Pharma Limited (NPL)	Code of Ethics	Document ID:	WW/ERC/SOP/0001
		Reference No:	N/A

○ Protection and Promotion of Human Rights

We respect, support, and uphold internationally recognized human rights standards across our operations and within our supply chain, ensuring dignity, fairness, and ethical treatment for all individuals.

External Partner and Third-Party Governance: Compliance Principles for Third Parties and Stakeholders

We assess, select, and monitor external partners to ensure alignment with our ethical, legal, and quality standards, thereby safeguarding the integrity of our value chain.

We expect all third parties, suppliers, contractors, and external stakeholders to uphold the same high ethical standards that guide our organization. All engagements with third parties are governed by applicable laws, regulations, and our internal procurement policies. We require our partners to uphold the highest standards of ethical conduct, including:

- **Prohibition of Child Labor** and adherence to international labor standards.
- **Respect for Human Rights**, ensuring fair treatment and freedom of association.
- **Environmental Responsibility**, complying with sustainability and protection laws.
- **Fair Employment Practices**, including safe working conditions and equitable wages.
- **Anti-Harassment and Non-Discrimination**, fostering a workplace free from bias and misconduct.
- **Commitment to Diversity and Inclusion**, promoting equal opportunity across all operations.

By adhering to these standards, we safeguard our reputation, protect stakeholder interests, and promote responsible business practices for regulatory compliance, and foster responsible, long-term partnerships.

We continuously monitor compliance and violations will result in termination of agreements and potential legal consequences.

○ Professional and Ethical Conduct in All Interactions

We require employees and partners to demonstrate professionalism, integrity, and responsible behaviour in all internal and external engagements. Demonstrated ethical leadership, transparency in difficult decisions, and willingness to speak up are prerequisites for leadership roles at Nouveaux.

○ Responsible and Transparent Public Policy Engagement

We engage in public policy activities ethically, transparently, and in alignment with our mission to advance patient health and societal benefit.

 Nouveaux Pharma Limited (NPL)	Code of Ethics	Document ID:	WW/ERC/SOP/0001
		Reference No:	N/A

○ Management of Conflicts of Interest

We require the disclosure, assessment, and appropriate management of all actual or potential conflicts of interest to preserve objectivity and uphold organizational integrity.

Our organization is committed to integrity and impartiality in all business dealings. **Employees** and **third parties** must avoid situations where personal interests conflict or appear to conflict with company interests. All actual, potential, or perceived conflicts must be disclosed promptly. We prohibit any actions that compromise objectivity, including improper gifts, favors, or influence.

Third parties are expected to maintain transparency and comply with our ethical standards. Failure to disclose or manage conflicts may result in corrective action, including termination of engagement.

○ Environmental Responsibility and Sustainability

We are committed to reducing our environmental footprint by integrating sustainable practices across operations, promoting resource efficiency, and supporting long-term ecological wellbeing.

○ Ethical Governance of Data and Technology

We handle data and digital technologies responsibly and in compliance with applicable privacy, cybersecurity, and data protection standards.

○ Anti-Corruption and Ethical Business Conduct

We uphold a strict prohibition on bribery and corruption in all interactions, requiring transparency, fairness, and ethical conduct throughout our business dealings.

Reporting Misconduct

We encourage employees, partners, and stakeholders to speak up if they witness or suspect unethical behavior, bribery, fraud, or any violation of our policies.

We provide secure and confidential channels to ensure reports are handled promptly and fairly and guarantee protection against retaliation for good-faith reports. Violations may result in disciplinary action, termination of contracts, and legal consequences. You can report misconduct through: **Email:** speakup@nplpk.com

Responsibility Begins with Each of Us

Upholding our ethical commitments requires leadership, responsibility, and integrity from every individual across the organization. Each of us is personally accountable for complying with the Code of Ethics, as well as all relevant policies, procedures, guidelines, and applicable local laws.

 Nouveaux Pharma Limited (NPL)	Code of Ethics	Document ID:	WW/ERC/SOP/0001
		Reference No:	N/A

When uncertainty arises or when the appropriate course of action is unclear, it is our obligation to seek timely guidance from the Ethics, Risk & Compliance function or any designated support or assurance function. By proactively seeking advice and exercising sound judgment, we ensure that our conduct consistently aligns with our values and expectations.

Consequences for Non-Compliance

 Failure to adhere to the Code of Ethics, internal policies, or applicable legal and regulatory requirements will result in corrective or disciplinary action. Depending on the severity of the violation, consequences may include coaching, formal warnings, suspension of duties, termination of employment, or referral to regulatory or law enforcement authorities.

 Non-compliance by third parties, contractors, or partners may similarly lead to corrective measures, including contract termination or legal action. The organization maintains a zero-tolerance stance toward retaliation against individuals who raise concerns in good faith.

 **In conclusion**, compliance with this Code of Ethics is a shared obligation and a fundamental requirement of our professional conduct. Through consistent adherence to these principles, we demonstrate our collective responsibility to act with integrity, accountability, respect, and excellence. This commitment is essential to protecting patients and communities, preserving stakeholder confidence, and ensuring the organization's enduring reputation and sustainability.