

Approved by

President, JSC "AKRIKHIN"
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ANTI-CORRUPTION POLICY
JSC "AKRIKHIN"

(THIRD REVISION)

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1. TERMS, ABBREVIATIONS AND DEFINITIONS

Anti-Corruption Clause	shall mean obligations, as well as representations and warranties of the parties to comply with the requirements of applicable anti-corruption legislation
Bribe	shall mean a receipt by a Public Official of material valuables (including money) or other property or non-property benefits or services for an action (or omission) in the interests of the briber or third parties, which the Public Official could or should have committed due to his/her official position, as well as actions aimed at transfer of such material valuables or other property or non-property benefits to a Public Official for corruption purposes.
Bribery	shall mean an offer, promise, giving, acceptance or request of an undue advantage of any valuables (either be property or non-property), either directly or indirectly and irrespective of location, being a violation of applicable laws, as an encouragement or reward for a person for an action (or omission) in relation to the performance of the duties of that person
Property Benefit	shall mean a benefit that has a certain market value: <ul style="list-style-type: none"> – this can be money (both in the form of cash and a bank transfer), checks, shares or other securities, bonus cards, as well as various kinds of valuables and gifts; – the Property Benefit shall also include a payment for educational services, transportation costs, hotel accommodation, and other types of services and work; – the Property Benefit shall also include a free provision of both things as such and a free access to them, or provision of services and/or sale of products at a price that is significantly lower than their market value, or purchase of products and/or services that do not meet business goals or are purchased at a price higher than their market value in the current market situation.
Non-Property Benefit	shall mean a benefit that also creates advantages for a person, but its valuation in monetary terms is difficult: <ul style="list-style-type: none"> – Non-Property Benefits can take the form, for example, of the employment of relatives or friends of the interested person or the creation of special conditions for their professional and job development; – Non-Property Benefits may also include creating an image or supporting the professional reputation of the interested person through public speaking or defending his personal interests, as well as take other forms.
Business Partners shall include	Buyers and distributors of the Company's products; Organisations engaged by the Company to provide services and perform various types of work;

	<p>Organisations engaged by the Company to conduct re-search;</p> <p>Partners within joint ventures;</p> <p>Partners under existing license agreements;</p> <p>Potential partners under future joint projects;</p> <p>Other organisations representing the Company's interests in interaction with third parties;</p> <p>Employees of the above organisations.</p> <p>Business Partners under no circumstances shall include individuals who are Public Officials or Healthcare Professionals, even if they hold positions in the above organisations.</p>
Abuse of authority	shall mean use by a person performing managerial functions in a commercial or other organization of his/her powers contrary to the legitimate interests of that organization and for the purpose of deriving benefits and advantages for himself/herself or other persons or causing harm to other persons, if this act has resulted in causing significant harm to the rights and legitimate interests of individuals or organizations or the legally protected public or state interests
Corrupt Payment	shall mean illegal handover to a person performing managerial functions at a commercial or other organisation of money, securities, other property, providing him/her with property-related services and granting him/her other property rights for the actions (or omission) in the giver's interests, in connection with his/her official position.
Company	JSC "AKRIKHIN"
Conflict of Interest	shall mean a situation in which the personal interest (direct or indirect) of an employee covered by the Policy, or the fact that such person or his/her associated persons hold positions in the management bodies of other organizations affects or may affect the proper, unbiased and impartial performance of his/her duties (exercise of powers) in the Company.
Corruption	shall mean abuse of official position, bribe giving and taking, abuse of authority, corrupt payment or other illegal use by an individual of his/her official position, contrary to legitimate public and state interests, and the interests of the Company, in order to gain a benefit in the form of money, valuables, other property, property-related, or other property rights for himself/herself or third parties, or illegal provision of such a benefit to such individual by

	other individuals; as well as the commission of the said acts on behalf of or in the interests of a legal entity.
Payment to simplify formalities (accelerating payment, facilitation payment)	shall mean payments or other benefits that are not provided for by current legislation or other regulations and that are offered with the purpose of accelerating or simplifying the execution of a normal procedure (action) to which the payer entitled in accordance with the laws, contract or on other grounds
Gift	shall mean any value transferred or received free of charge
Hospitality (expenses)	shall mean expenses of the Company for receiving and attending of representatives of other organizations (including foreign) participating in negotiations with the purpose of establishing and maintaining mutual cooperation
Public Officials shall include:	<p>1) any Russian or foreign person, either appointed or elected, holding or substituting any position in a legislative, executive, administrative or judicial body or an international organization;</p> <p>2) any person holding a position in an organization established to perform public functions of the state; leading political figures, officials of political parties, including political candidates;</p> <p>4) persons known to be related to a public official by family, friendship or business relations, or acting on behalf of or in the interests of a public official.</p>
Healthcare Professionals shall include:	medical workers and managers of medical organisations, other professionals whose professional activity is the study or use of medicines

2. PURPOSE OF THE ANTI-CORRUPTION POLICY

The Company strives to conduct business in good faith in accordance with high ethical standards. The Company operates in strict conformity with the laws of the Russian Federation and mandatory requirements, as well as the values and principles stipulated by the Code of Ethics of the Company (hereinafter referred to as the "Code of Ethics").

The Company does not tolerate corruption in any form. All employees of the Company shall meet high standards of honesty, integrity and business transparency in their work.

The Company's managers at all levels shall be an ethical role model and make the necessary efforts in developing a corporate culture where corruption has no place and will not be tolerated in any form. The managers shall lead the way in following ethical values at all times and provide full support when dealing with any ethical or legal situation raising doubts.

On its part, the Company develops internal procedures, issues internal regulations, including this Anti-Corruption Policy (hereinafter, the "Policy"), and trains employees to provide them with all the necessary knowledge that would help them to correctly and timely recognise the dangers associated with corruption and clearly understand what to do to eliminate the potential risk of corrupt or unethical behaviour.

3. SCOPE OF THE ANTI-CORRUPTION POLICY

This Policy is an internal regulation of the Company that defines the principles of business ethics, standards of behaviour for the Company's employees and the requirements aimed at preventing abuse and violations of the current anti-corruption laws.

The Policy shall be binding on all employees of the Company for mandatory compliance and execution. The Policy follows the principles set out in the Company's Code of Ethics and is an integral continuation thereof.

The Company's Business Partners shall comply with the requirements of this Policy and ensure that their employees comply with the requirements of this Policy in cases where such obligations are stipulated in the Company's contracts with its counterparties.

This Policy has been adopted to ensure a systematic approach to preventing and identifying any manifestations of corruption, as well as determines the procedure for reporting the facts of identified violations, ensuring an objective investigation of cases of corruption.

4. PROHIBITION OF CORRUPTION ACTIONS

In pursuance of the principle of zero tolerance for corruption, the persons specified in Clause 3 are strictly prohibited either directly or indirectly, personally or through third parties from participating in any corrupt actions. This also applies to actions on behalf of the Company in relation to third parties, as well as actions on behalf of third parties in relation to the Company, including:

- offering, giving or promising bribes;
- soliciting, asking, receiving or agreeing to receive bribes;
- committing commercial bribery;
- making payments to simplify formalities in any form;
- being an intermediary in the commission of any of the above actions.

5. RISK AND LIABILITY ASSOCIATED WITH CORRUPTION

Any forms of corruption contradict not only the values and the Code of Ethics, the provisions of this Policy, but also the Russian and international laws. The actions contrary to the laws and this Policy can have serious adverse consequences both for the Company and for all persons involved in corrupt acts.

As a result of his/her corruption offence, a Company's employee may be brought to criminal, administrative, civil law and/or disciplinary liability as well as the Company may also be brought to administrative or civil law liability.

Moreover, the Company may suffer significant financial damage and lose its impeccable reputation. Therefore, each employee of the Company shall be responsible for strict compliance with the laws and internal regulations of the Company.

6. BUSINESS UNIT RESPONSIBLE FOR ANTI-CORRUPTION

The Ethics and Business Standards Division shall be responsible for coordinating the implementation and improvement of the anti-corruption system.

The Ethics and Business Standards Manager shall be an official responsible for the implementation and improvement of the anti-corruption compliance program, have the necessary experience and competencies, as well as provided be provided with independence, powers and resources sufficient to perform his/her duties.

The tasks of the Ethics and Business Standards Division shall be as follows:

- monitoring of compliance with the requirements of the Policy and applicable anti-corruption legislation;
- operational management of the anti-corruption compliance program;
- continuous improvement of the compliance program;
- approval of transactions with a high corruption risk.

7. ANTI-CORRUPTION PRINCIPLES

Personal example on the part of the senior management: the Company's senior management plays a key role in forming a culture of intolerance to corruption and in creating an internal system of preventing and combating corruption in the Company.

Zero tolerance for corruption: the Company does not accept any forms and manifestations of corruption in pursuing its operational, financial, economic and other activities, including in interactions with shareholders, investors, counterparties, government bodies, Public Officials, political parties and their representatives and other persons.

Preventiveness of the implemented anti-corruption measures: the Company gives preference to preventive anti-corruption measures and the implementation of policies and procedures that prevent violations of established standards and requirements.

Compliance with applicable laws: the anti-corruption system in the Company has been put in place in accordance with the requirements of applicable anti-corruption and other laws and with due allowance for leading global practices. The Company arranges for constant monitoring of its relevance.

In the event that the provisions of the laws, contracts or collective agreements provide for stricter rules than those set out in this Policy and other local regulations, the stricter regulation shall apply.

Employee involvement: the Company informs employees about the provisions of anti-corruption legislation and involves employees in the process of developing and implementing anti-corruption standards and procedures.

Effectiveness and proportionality of anti-corruption measures to the risk of corruption: the development and implementation of a set of measures to reduce the likelihood of the Company and employees being involved in corrupt activities is carried out in view of the corruption risks that exist in the Company's activities. In his regard, preference is given to measures that are low cost, easy to implement and deliver significant results.

Control and monitoring of effectiveness: the Company arranges for regular assessment and revision of the anti-corruption system in the event of insufficient effectiveness of individual control procedures or measures.

Business openness: the Company takes measures to inform counterparties, partners and the public about the anti-corruption standards of doing business adopted by the Company.

Due diligence: the Company makes reasonable efforts to avoid entering into business relationships with business partners who may be involved in corrupt activities.

Refusal to prosecute: no sanctions may be imposed to employees or business partners of the Company who refuse to participate in corrupt activities, even if such refusal resulted in the Company not receiving profit or other commercial or competitive advantages, as well as to persons who in good faith reported the commission of corrupt activities by other employees or business partners of the Company.

Mandatory application and inevitability of punishment for violation: the statutes of applicable anti-corruption laws and anti-corruption requirements established by the Company are mandatory for compliance by all employees (regardless of position, length of service and other circumstances). In case of violation of the said statutes and requirements, the guilty persons shall be held liable in accordance with the applicable legislation and the local regulatory acts of the Company.

8. CORRUPTION RISK AREAS

Business Gifts and Business Hospitality

Exchange of business gifts and organization of hospitality events shall be considered as a corruption risk area and shall be regulated by the provisions of this Policy and the General rules for receiving and giving gifts and offering hospitality.

The Company's employees are permitted to receive and give gifts or offer hospitality, provided that:

- the gift/hospitality received or given/offered is appropriate, modest and insignificant, does not contradict business practice established and recognised in the society, and the value, nature and type of gifts/hospitality do not put the Company's reputation at risk. In NO situation it is permitted to receive, provide, offer or promise money and/or an equivalent thereof as a gift/hospitality, including checks, shares, bonds and other securities, bonus cards, etc.;
- the receipt/provision of a gift or hospitality shall not obligate or force a Company's employee/Business Partner to perform any action/omission or to take any decision in favour of such person.
- A gift shall be given/received explicitly and openly. If a gift is given by a Company's employee, it must clearly be understood as given on behalf of the Company and not a specific employee;

The Company's employees are not permitted

- to receive, provide, offer or promise money and/or an equivalent thereof as a gift/hospitality, including checks, shares, bonds and other securities, bonus cards, etc.;
- The gifts or hospitality accepted/provided must not affect the objectivity and integrity of the Company's employees/Business Partners while performing their job duties, or have a negative impact on the Company's reputation;

A gift/hospitality, purposes and circumstances of the receipt/provision thereof shall not contradict the laws, requirements of this Policy, as well as other internal regulations of the Company.

Interaction with Public Officials

The offering to a Public Official of Property and Non-Property Benefits and/or advantages in connection with the performance of his/her job duties and functions is a corruption offence, which may entail punishment in the form of imprisonment and heavy fines both in relation to the offenders and their employers.

While interacting with Public Officials it is prohibited:

- to make proposals that may put them in a situation of a Conflict of Interest;
- to provide, offer or promise money or an equivalent thereof, including checks, shares, bonds and other securities, bonus cards, etc.;
- to provide, offer or promise valuables, services and their payment, as well as any Property and Non-Property Benefits that could induce them to committing certain actions or omissions within the framework of their job duties, inter alia, to arrange or pay for any entertainment, cover transportation expenses and expenses associated with the organisation of recreation or the participation of Public Officials in entertainment events;
- to provide, offer or promise gifts of any value, with the exception of cases provided for by law;
- to provide, offer or promise any valuables, advantages, as well as Property or Non-Property Benefits (including the covering of expenses) to relatives and acquaintances of a Public Official, as well as to other persons associated with or named by a Public Official.

Meetings with Public Officials shall take place openly, in the premises of government or municipal authorities and institutions or other official work premises used by Public Officials to perform their job duties.

If meetings with Public Officials are held outside the premises of a government/municipal authority or institution, the hospitality shall not be excessive. The nature and extent of hospitality shall be such that the Public Official does not consider it inappropriate or oppressive.

The Company does not finance or in any other way support or offer incentives to political parties or their members, including political candidates, their election campaigns or political events, or any political organizations or movements. The Company refrains from the payment of contributions for political purposes.

"Facilitation Payment"

The Company prohibits the provision, offering or promising any valuables, advantages or benefits to Public Officials, even if the purpose of provision of benefits is to expedite or to ensure the implementation of an action that the Public Official regularly performs as part of his/her job duties ("Facilitation Payment"). The Company considers the provision, offer or promise of benefits of this kind to be corrupt.

The exception shall be payments explicitly provided for by the laws for extending the validity of certain documents or for expediting the implementation of established procedures (for example, the issuance of a document or a certificate for a longer period or a reduction of the period for consideration and issuance of a visa for an additional fee). Such payments shall be made directly to a government/municipal body or a relevant institution providing such services.

Interaction with Healthcare Professionals

While interacting with Healthcare Professionals it is prohibited:

- to provide, offer or promise any gifts regardless of their value;
- to provide, offer or promise any Property and Non-Property Benefits that could induce them to committing certain actions or omissions within the framework of their job duties;

- to arrange or pay for any entertainment, cover transportation expenses or expenses associated with the organisation of recreation or the participation of Healthcare Professionals in entertainment events;
- to provide, offer or promise any valuables, advantages, as well as Property or Non-Property Benefits (including the covering of expenses) to relatives and acquaintances of a Healthcare Professional, as well as to other persons associated with or named by a Healthcare Professional;
- to perform other actions in relation to Healthcare Professionals that are directly prohibited by the laws of the Russian Federation, in particular, by the law on Fundamentals of Protecting the Health of Citizens.

At the same time, medical workers or heads of medical organisations may be paid remuneration provided for by the current laws and internal regulations of the Company (including payment for the services of conducting clinical trials, the services related to carrying out scientific or educational work).

Interaction with Business Partners

The Company does not engage agents, distributors, other representatives and intermediaries to make any payments or actions that contradict the principles and requirements of this Policy and create a risk to its business reputation or the business reputation of its employees in the performance of their official duties.

The Company arranges for a fair, open and transparent process for selecting suppliers, contractors and other counterparties based on the use of unbiased selection criteria, as well as a transparent procedure for determining the cost of purchased and sold products, which are regulated by applicable laws and the Company's internal regulations.

The Company takes the necessary measures to avoid entering into business relations with counterparties and business partners who may be involved in corrupt activities, to identify payments and other financial transactions that have a potential corrupt component or are aimed at legalizing (laundering) proceeds from crime, financing terrorism, financing the proliferation of weapons of mass destruction.

The Company prohibits, on its own behalf or in its own interests, entering into any non-contractual relations that are not provided for by applicable laws and the Company's internal regulations, with any categories of counterparties, including any written or verbal arrangements, including in electronic form, that are not included in the main text of the contract with the counterparty or an appendix thereto, or in another form, and that have not undergone the standard approval procedures adopted by the Company.

When making a decision on interaction or cooperation with an intermediary, agent, partner, supplier or other counterparty, the Company shall:

- conduct a check of information about a potential counterparty or business partner, including their reliability, business reputation, as well as the absence of a conflict of interest;
- inform a potential counterparty or business partner of its anti-corruption principles and requirements by including special anti-corruption clauses in the text of the contract entered into with them.

Conflict of Interest

When performing their official duties or representing the interests of the Company, the Company's employees shall be guided by the principles and requirements of the internal regulations regulating the procedure for preventing, disclosing and resolving conflicts of interest, and shall also avoid and not allow situations that directly lead to a conflict of interest, including:

- decision-making on any business issues and performance of their official duties be guided exclusively by the interests of the Company;
- not use their official position (including insider information, confidential information and information that is a trade secret), property or assets of the Company for personal interests;
- disclose information about their personal interests that may lead to a real or potential conflict of interest, in accordance with the Conflict of Interest Management Policy.

Donations and Grants

A Donation shall mean the provision of material benefits to non-profit organisations for generally beneficial purposes.

One of the acceptable types of donation may be the targeted free of charge provision of the Company's products.

The donation may also take the form of an educational or research grant to support medical education or scientific research. In such case, the donation is provided not to specific Healthcare Professionals, but directly to educational, medical or other non-profit organisations.

The donation shall be purely gratuitous and cannot be made for the purpose of receiving any compensation or benefit.

Any donations can only be made under a concluded agreement in accordance with the requirements of applicable laws, and shall also be properly reflected in the Company's accounting records.

Accounting and Internal Control

The Company shall ensure the correctness, reliability and completeness of its accounting data.

All business transactions and transactions with the Company's assets shall be reflected in the Company's accounting records in a timely, conscientious manner, and with sufficient detail.

The Company maintains the proper internal control over its business operations.

Intentional concealment, distortion or incomplete recording of business transactions in the Company's accounting records is prohibited and is considered a material violation of applicable laws and this Policy.

Cases of Claiming Undue Benefits

It should be taken into account that each employee of the Company, while performing his/her duties, may receive an offer of a corrupt nature. There might be a situation, when someone may express their expectations of receiving unreasonable benefits or advantages, or explicitly demand them. Any such request or demand shall be refused, explaining that such actions contradict the principles of the Company and are strictly prohibited by its internal regulations.

Each incident of receiving corrupt proposals shall be promptly reported to the immediate supervisor or the Ethics and Business Standards Manager.

9. WHISTLEBLOWING CHANNELS

Any employee of the Company, regardless of the position held, who has become aware of evidence (or essential elements thereof) of a violation or abetting the violation of the provisions of this Policy or

applicable anti-corruption laws by either the Company's employees or any third parties, shall report the above in any of the following ways (including anonymously):

- a personal meeting with the immediate supervisor or an employee of the Ethics and Business Standard Division after prior agreement of the time and place;
- a telephone conversation or recording a message on an answering machine: tel.: +7 (495) 785-25-08;
- sending an e-mail to: *hotline@akrikhin.ru*;
- filling out an application form on the corporate portal or official website *www.akrikhin.ru*;
- sending a mail to: 9, Zemlyanoy Val Street, 105064 Moscow, Russia, JSC "AKRIKHIN", attn: Ethics and Business Standards Division.

The Company shall maintain the confidentiality of any whistleblower, and the whistleblower may prefer to remain anonymous. If the whistleblower provides his/her name and contact information, the Company will be able to provide the whistleblower with feedback and send a response or information on the results of the investigation of the report.

The Company shall guarantee that no employee will be subject to sanctions (including dismissal, demotion, deprivation of a bonus, etc.) by the Company if the employee reported in good faith an alleged evidence of corruption, or if the employee refused to commit corrupt acts, including if as a result of such refusal the Company suffered lost profits or did not receive commercial or competitive advantages.

Provision by Company's employees of knowingly false information, as well as failure to disclose information about cases of contacting them by any persons for the purpose of inciting them to commit corrupt acts, as well as other information, the disclosure of which is mandatory in accordance with this Policy, shall be considered a violation of this Policy, and the person who provided false information may be subject to disciplinary action.

10. ENTRY INTO FORCE AND LIABILITY FOR VIOLATION OF THE ANTI-CORRUPTION POLICY

This Anti-Corruption Policy is an internal regulation of the Company, comes into force on the date of its approval by the President of JSC "AKRIKHIN" and replaces the previous Anti-Corruption Policy dated 26 March 2018.

This Policy shall be valid until 31 December 2028.

Failure to fulfil or improper fulfilment by a Company employee of the requirements of this Policy may be regarded as a disciplinary offence, and disciplinary action may be applied to the employee who committed a violation in the manner prescribed by the labour law of the Russian Federation.

Appendix 1. Regulatory Reference

No.	Title
1	Code of Ethics
2	Grant and Donation Policy
3	Conflict of Interest Management Policy
4	Regulation on the Consideration of Reports of Violations of Corporate Procedures and Applicable Laws

Appendix 2. Revision Record

Version No.	Effective date	Reason for change	Description of changes
1.0	21 December 2015	Approved by the President of the Company on 21 January 2015	New document
2.0	26 March 2018	Approved by the President of the Company on 26 March 2018	Changed Donations and Grants, Gifts and Business Hospitality sections
3.0		Approved by the President of the Company on	Updated and supplemented all sections of the Policy. New layout.