



CODE OF ETHICS



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1 SCOPE

This Code of Ethics is the foundation of the work that we do at Galena Pharma for providing products and services to our clients.

We encourage our partners to get acquainted with the principles of our ethical operations, and thus we have made the guide freely available at our website, www.galena.fi.

We expect all our partners to act ethically and responsibly. Together we shall achieve the best possible outcome.

2 BUSINESS TRANSPARENCY

2.1 Compliance with the law, international stipulations, and obligations

All our operations comply with Finnish legislation, regulations, good governance, and generally accepted business principles and form a sustainable foundation for Galena Pharma's Code of Ethics.

Our processes follow EU GMP guidelines and standards ISO 9001:2015, ISO 13485:2016, ISO 14001:2015 and ISO 22716:2007. We meet the requirements of the Medical Device Regulation (MDR Regulation (EU) 2017/745).

Galena Pharma's personnel must be mindful of the work-related laws and regulations and thus must act accordingly.

2.2 Fight against corruption

Galena Pharma does not approve of bribery or corruption in any form. Our staff must not offer, receive, or otherwise accept bribes or any other undue benefits that may have an improper influence on work performance.

We act responsibly in matters concerning hospitality or offering or receiving gifts.

2.3 Protecting the information and property in our possession

We comply with legal requirements related to information security in all our operations. We process the personal data of our employees, clients, partners, and other parties with confidentiality.

We keep trade secrets and other sensitive information protected. Our staff or affiliates cannot disclose or use any data without permission.

Our personnel are encouraged to take care of the company assets: both tangible and intangible and use them diligently for business purposes only. The unauthorized use of the company's assets is prohibited.

2.4 Anti-money laundering

Galena Pharma ensures responsible decision-making and provides reliable, up-to-date, and accurate information about its operations. We comply with national laws and generally accepted accounting standards in accounting and reporting. All business entries are complete; we prohibit all inaccurate and untrue entries. Galena Pharma strictly complies with prohibitory money laundering laws.

2.5 Competition law

Galena Pharma competes in the market and meets the needs of customers as successfully as possible. We achieve this through fair and transparent practices of not entering into agreements that restricting competition or participating in activities aimed at it. Our operations do not allow any antitrust or unfair trade activity, such as price collusion, cartel formation, or market abuse.

3 CARING FOR THE WORK COMMUNITY AND PEOPLE

3.1 Human rights and equality

Galena Pharma respects and strongly supports human rights and equality. We comply with the UN Universal Declaration of Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

Galena Pharma does not approve of harassment, violence, exploitation, or discrimination based on race, color, age, religion, sexual orientation, disability, political or other opinions, social status, language, or nationality.

Our personnel have freedom of expression at the workplace. Outside working hours, they represent themselves with their opinions and are responsible for them. At Galena Pharma, we implement equality and justice in all our operations.

3.2 Health and Safety

Galena Pharma constantly operates under good safety practices. The goal of our operations is an accident-free work community. In our operations, we invest in prevention and the reliability and efficiency of safety measures and equipment.

Galena Pharma responsibly handles all employer obligations and respects the freedom of association of employees and the legal principle of wage payment.

Competent and well-being employees are our most important resource. We take care of employees' endurance and occupational safety. We expect our partners to appreciate the same values.

4 INFLUENCING ENVIRONMENT

Galena Pharma strives for environment-friendly actions in all its operations by constantly developing environmentally safe measures. We strive to minimize adverse environmental impacts in the procurement of materials and the use of our services. We use materials and resources efficiently and ecologically in all our product manufacturing processes and service concept. We are continuously looking for more environmentally sustainable and intelligent ways and better utilization throughout the value chain.

5 RESPONSIBLE PROCUREMENT AND MANUFACTURING

At Galena Pharma, all purchases are made responsibly and under approved procurement practices. We ensure that the raw materials used in our products and services follow ethically approved principles and practices. We expect affiliates to comply with the law and adhere to the principles of this Code of Ethics. We monitor their activities through audits. We want our cooperation to be honest and based on mutual respect and trust, thus delivering a quality product and service to our customers.

There are many aspects to responsible product manufacturing. Product liability related to the manufacture and sale of products can be viewed, for example, from the perspective of product safety, product information, or marketing.

At Galena Pharma, we regulate manufacturing by strict national and EU-level legislation, which provides a framework for manufacturing safe products. Providing legal information is part of the legal requirements, but transparent disclosure of the origin of raw materials, production conditions, and methods goes beyond legal requirements. It is, therefore, necessary to pay attention to the product origin, production conditions, and responsibility certifications when procuring raw materials.

Ensuring product quality in product design, development, manufacturing, and throughout the product life cycle indicates our sense of responsibility for our client's products.

6 REPORTING OF VIOLATIONS AND CONCERNS

Galena Pharma wants to ensure that the Code of Ethics gets followed and any potential concerns and violations get reported. Respecting the Code of Ethics guarantees that we abide by our commitment responsibly and assures our stakeholders and partners of our responsible behavior.

We encourage our staff and partners to report any concerns or other potential or suspected inconsistencies to their supervisor (employees) or anonymously through the whistleblower channel for employees or to the contact persons (partners), respectively, without delay and at a low threshold.

Galena Pharma will investigate all received notifications and will take necessary action.

7 GIFTS, FAVORS, AND CONFLICTS OF INTEREST

A conflict of interest arises if the own personal interests of the employee are in conflict with the interests of Galena Pharma. Employees must notify Galena of any activities, financial interests or relationships outside of their work that may lead to such conflicts of interest.

7.1 Gifts, Favors, Entertainment or Events

- A gift does not entail any expectation of reciprocity.
- Never solicit a gift, meal, entertainment, or favor from anyone, including suppliers.
- Only accept items of moderate value from all third parties, including suppliers.
- Give ethically - providing gifts, meals, and entertainment that are understood to be reasonable and customary business courtesies.
- Accurately record all expenditures when giving gifts, meals, entertainment, or anything else of value.
- Obtain prior approval to attend events paid for by any third party. Do not accept payment of travel expenses.

7.2 Preferential Treatment, and Working or Consulting Outside the Company

Get prior approval before accepting any additional or supplemental employment or positions outside of Galena that may interfere with our job responsibilities or could benefit from confidential information gained during employment.

7.3 Financial Interests

Disclose any personal or family financial interests in organizations that do business or seek to do business with Galena.

Get prior approval before entering into any situation where it may be possible to benefit personally from a transaction involving Galena - for instance, buying property, services, or products from a business that is personally owned by us or a family member.