



Code of Conduct

Document information

Company Curida Group

Prepared by the Sustainability Group

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Foreword from the CEO

At Curida, we are proud of the role we play in improving lives. With this responsibility comes the expectation that we always act with integrity, sustainability, and care — for each other, our customers, our partners, and the world around us.

This Code of Conduct is more than a policy document; it reflects who we are and what we stand for. It guides our decisions and behavior across all aspects of our business. We operate in a highly regulated environment, and we hold ourselves to standards that not only meet legal requirements but often go beyond them.

By following this Code, each of us contributes to maintaining the trust that others place in us, every day. I encourage you to read it carefully, apply it in your work, and speak up if something doesn't seem right.

Thank you for your commitment.

Name: Anders Larsson

Chief Executive Officer, Curida Holding AS

Date: 06.06.2025

Signature: _____

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Introduction

Curida Group (now called Curida) consists of three business units.

- Curida AS in Elverum
- Curida Diatec at Fornebu
- Ås produksjonslab at Ås

Corporate ethics govern our behavior towards each other and the world around us. The Code of Conduct (CoC) forms the cornerstone of our corporate culture, defining the core principles and ethical standards by which we operate within our company. The CoC provides guidelines for both internal and external conduct, aiming to foster ethical awareness and serve as a blueprint for daily actions.

This Code applies to all board members, employees, and representatives of Curida. We strive for these guidelines to be well-known among customers, suppliers, acquired companies, and partners. All managers are accountable for ensuring familiarity with the CoC, adherence to its principles, and taking appropriate action if violations occur. Each employee bears the responsibility to read and comply with the CoC.

Violation of the CoC may result in disciplinary action, including termination and potential legal proceedings. To uphold Curida's high standards of quality and ethical conduct throughout our value chain, we regularly conduct compliance checks based on the principles outlined in this document.

Our values and culture

At Curida, we live by our core values. We are:

- **Flexible**
- **Enthusiastic**
- **Trustworthy**
- **Bold**

These values shape our behavior and decision-making both internally and externally. Curida expects employees to uphold these values, treating others with respect and fostering open communication.

To support our culture and drive positive energy across teams, we highlight the following examples of energy-creating behavior in everyday work:

- “We work according to a shared plan with clearly defined priorities that everyone understands.”

- “We comply with established procedures and all health and safety regulations.”
- “Each of us takes responsibility for delivering high-quality results — in the best interest of the customer.”
- “We maintain a strong business focus and stay aligned with our strategic goals.”
- “We adapt proactively to changing market demands.”
- “We meet deadlines and communicate early if any delays arise.”
- “We recognize and support each other’s efforts and achievements.”
- “We speak with respect and integrity — saying nothing about others that we wouldn’t say directly to them.”
- “We maintain a clean and well-organized work environment.”
- “We provide honest, constructive feedback and help each other grow.”
- “We value social interaction and contribute to a positive and inclusive workplace culture.”

Our workplace is meant to be inclusive, engaging, and safe. Discrimination or harassment based on age, gender, disability, ethnicity, sexual orientation, religion, or political views is strictly prohibited. When working in different cultural settings, we show respect for individuals, organizations, and local customs, and comply with applicable national laws and regulations.

As part of a regulated pharmaceutical industry, Curida also upholds internationally recognized human rights, including those outlined by the International Labor Organization (ILO), and rejects all forms of child labor, forced labor, and discriminatory practices. These expectations apply not only to our employees but also to our suppliers and business partners.

Human rights and labor practices

Curida complies with Norwegian labor law, which offers among the world’s strongest protections for workers. We adhere to:

- Arbeidsmiljøloven (AML) §2-1: Ensures a fully safe, inclusive, and legally sound working environment.
- AML §13-1: Prohibits discrimination based on gender, ethnicity, religion, disability, sexual orientation, age, etc.
- AML §14-15: Secures lawful pay and benefit practices.
- ILO Core Conventions: Enshrined in Norwegian law, these ensure:
 - Prohibition of child labor and forced labor
 - Freedom of association and right to collective bargaining
 - Elimination of discrimination in employment

Curida confirms that we do not use child labor or forced labor. Employment under 18 is not permitted in operational or hazardous roles, and we follow youth work restrictions per Norwegian regulations.

We expect all business partners and suppliers to uphold similar standards and to document their practices upon request.

Health, safety, and the working environment

A safe and healthy working environment is a fundamental right and responsibility. Curida follows the requirements set out in AML Chapter 3 by conducting regular risk assessments, implementing preventive measures, and ensuring that all employees are trained in relevant health and safety procedures. We emphasize preparedness through routines for emergency response and safe handling of hazardous materials.

Employees are expected to comply with safety rules and contribute actively to a strong safety culture. This includes reporting hazards, participating in drills, and using the required protective equipment. The goal is to prevent injury and illness, protect the environment, and ensure operational continuity.

Environmental responsibility

Curida acknowledges the environmental impact of our operations and has embedded sustainability into our decision-making processes. We comply with the Norwegian Pollution Control Act (Forurensningsloven) and Environmental Information Act (Miljøinformasjonsloven), and we strive to go beyond compliance by pursuing continuous improvement.

We are committed to reducing greenhouse gas emissions across Scope 1, 2, and 3, optimizing renewable energy utilization, minimizing non-renewable resource consumption, reducing waste generation, and mitigating environmental effects associated with our product manufacturing.

Curida complies rigorously with all relevant environmental, health, and safety laws, and endeavors to surpass legal requirements to proactively mitigate our environmental footprint. We seek partnerships with like-minded entities that prioritize environmental sustainability as a hallmark of quality in end products, such as safe and effective pharmaceuticals and medical devices.

Ethics and anti-corruption

Integrity is a non-negotiable principle in all our business activities. In accordance with the Norwegian Penal Code (Straffeloven §§26-6 and §387–389), we maintain a zero-tolerance policy toward corruption and bribery. We do not allow any form of direct or indirect bribes, kickbacks, or facilitation payments.

Business courtesy such as gifts or hospitality may only be offered or accepted if they are modest, infrequent, and clearly unrelated to any business decisions. Employees must disclose any situation that could present a conflict of interest, including relationships or financial interests that may interfere with their duties.

Anti-money laundering and financial integrity

Curida is committed to full compliance with the Anti-Money Laundering Act (Hvitvaskingsloven). We take necessary steps to identify our business partners, monitor financial transactions, and report any suspicious activity to the appropriate authorities.

All financial records must be accurate, complete, and maintained in line with the Norwegian Accounting Act. Employees and partners are expected to act with financial transparency and integrity in all dealings.

Data protection and confidentiality

The protection of personal data and confidential business information is critical to maintaining trust. Curida follows the General Data Protection Regulation (GDPR) and the Norwegian Personal Data Act (Personopplysningsloven) when collecting, processing, and storing data.

Only authorized personnel may access confidential or sensitive information, and all data must be handled with care and appropriate technical safeguards. Breaches must be reported without delay, and data subjects' rights must always be respected.

Supplier expectations

Curida expects suppliers to operate ethically, sustainably, and in alignment with internationally recognized standards. All suppliers are required to either sign Curida's Supplier Code of Conduct or demonstrate that they have their own Code of Conduct that is substantially equivalent — particularly regarding human rights, decent working conditions, and labor standards.

We expect our suppliers to uphold fair labor practices, respect human rights, maintain high environmental standards, and have zero tolerance for corruption throughout their operations and supply chains.

In accordance with the Norwegian Transparency Act (Åpenhetsloven), Curida conducts an annual risk-based assessment of our most significant suppliers, based on criteria such as geographical location, industry, and potential impact on human rights and working conditions. This assessment provides valuable insight into risk exposure in our supply chain and forms the basis for targeted follow-up actions.

Further details can be found in our Transparency Act Statement (Redegjørelse av Åpenhetsloven 2024), available on the Curida Group website.

Whistleblowing and non-retaliation

Curida encourages all employees, partners, and stakeholders to report suspected breaches of this Code. In accordance with Section 2A-1 and 2A-4 of the Norwegian Working Environment Act, we strictly prohibit any form of retaliation against individuals who report concerns in good faith.

Retaliation includes, but is not limited to, dismissal, demotion, exclusion, threats, harassment, or other negative consequences because of whistleblowing. Anyone who experiences or witnesses retaliatory actions is encouraged to report them immediately.

All concerns will be handled promptly, professionally, and in accordance with applicable legal and ethical standards.

Governance, implementation, and review

The Board of Curida holds ultimate responsibility for the approval, implementation, and periodic review of this Code of Conduct. It is reviewed at least annually to ensure continued relevance and compliance with evolving legal and ethical requirements.

All employees and suppliers are required to confirm their understanding and acceptance of this Code. Training and communication measures will be used to support awareness and application in day-to-day operations.