

ANTICORRUPTION POLICY BC-POL-00001_E

1. PURPOSE

Biotest is fully committed to the highest level of ethical conduct and to compliance with all applicable laws, rules and regulations wherever it does business.

As a company with significant global operations, Biotest is subject to many national laws that prohibit the corruption of government officials. In addition, there are laws and regulations, such as in the United Kingdom, that extend this prohibition to the bribery of private individuals.

Bribery and corruption is totally contrary to the ethical conduct of our business and could seriously damage Biotest's reputation. Bribery is a criminal offence in many countries and any corrupt act exposes both Biotest and its employees to the risk of prosecution, fines and imprisonment.

This Anti-Corruption Policy provides guidance to the board members, other executives, employees and the governing bodies of Biotest AG including all of its subsidiaries around the world (the “**members of Biotest**”), as well as to Business Partners (as defined below), on appropriate standards of conduct for interactions with Government Officials (as defined below) and other identified private individuals (the “**Other Covered Individuals**” as defined below).

Furthermore, this Policy includes prohibitions against the solicitation and acceptance of bribes and kickbacks by members of Biotest and Business Partners.

All members of Biotest and Business Partners involved in any aspect of the marketing, promotion, sale, distribution, registration, reimbursement, pricing, and/or import/export of Biotest products are responsible for understanding the requirements of this Policy and its applicability to the work they perform for Biotest.

This Policy is part of a broader compliance program and other policies or procedures may address more specific areas of legal and compliance risk or other country-specific requirements. Members of Biotest should refer to these additional policies and/or procedures for further guidance in specific situations and should contact their supervisor (as applicable), the Compliance Department and the Legal Department in case of questions or doubts.

All members of Biotest should be thoroughly familiar with this Policy as well as other policies and procedures. This Policy is available on the intranet site of the Compliance department and the internet of Biotest.

Biotest rejects acts of bribery and corruption by any member of Biotest or Business Partners. Local management of Biotest's subsidiaries hold the primary responsibility to ensure that this Policy is implemented within their areas of responsibility.

2. SCOPE

This Policy applies to Biotest AG and its subsidiaries (“**Biotest**”) as well as to Business Partners, as indicated below.

3. DEFINITIONS

The term “**Government Official**” shall mean:

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- any officer or employee of a government or any department, agency, or instrumentality of a government;
- any person acting in an official capacity for or on behalf of a government or any department, agency, or instrumentality of a government;
- any officer or employee of a company or business owned in whole or in part by a government, including health care professionals employed by government-owned hospitals or clinics or other health care facilities, or any person acting in an official capacity for or on behalf of such a business;
- any officer or employee of a public international organization such as the United Nations or World Health Organization, or any person acting in an official capacity for or on behalf of such an organization;
- any officer or employee of a political party; or
- any candidate for political office.

The term “**Other Covered Individual**” means any director or employee of a private business entity, such as corporations, mercantile companies, foundations or other organizations, who has duties and obligations with respect to that business entity and who is expected to act in good faith and impartially.

The term “**Business Partner**” shall mean any distributor, consultant, agent, broker or other individual or entity that is not part of Biotest and that will be or is engaged or used by Biotest:

- to market, promote, sell and/or distribute Biotest products and/or services, and/or
- to provide services that enable or support the marketing, promotion, sale, distribution, reimbursement, registration, pricing and/or import-export of, or regulatory-related work for, Biotest products and/or services and may involve any interactions with Government Officials.

The term “**anything of value**” should be interpreted broadly and may include, but is not limited to:

- money or payments or equivalents, such as gift certificates or vouchers;
- gifts or free goods;
- meals, entertainment, or hospitality;
- travel or payment/reimbursement of expenses;
- provision of services;
- overpayment of property or services;
- assumption or forgiveness of indebtedness;
- intangible benefits or other advantages, such as enhanced social or business standing (e.g., making donations to government official’s favored charity); and/or
- benefits to third persons related to Government Officials or Other Covered Individuals (e.g., close family members).

4. POLICIES

4.1. Prohibited Payments and Conduct

(a) Corruption of Others

Members of Biotest and Business Partners are prohibited from giving, promising, offering, or authorizing the giving of anything of value, either directly or indirectly through any other person or entity, to a Government Official or Other Covered Individual either (i) for any improper purpose, or (ii) where the member of Biotest or a Business Partner knows or believes that the acceptance of the thing of value by the Government Official or Other Covered Individual would itself constitute either a breach of an expectation of good faith or impartiality or a breach of trust by that person in his or her role as a Government Official or Other Covered Individual.

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An improper purpose is the purpose of obtaining or retaining business for Biotest by:

- influencing any act or decision of such person in his/her official capacity;
- inducing such person to do or omit to do any act in violation of his/her lawful duty or in breach of trust;
- securing an improper advantage;
- inducing such person to use his/her influence with a government or instrumentality thereof to affect or influence any act or decision of such a government or instrumentality; and/or
- inducing such person to breach his/her duties and obligations with respect to the sale of goods or services.

Solicitation and Extortion

If any Government Official or Other Covered Individual, directly or indirectly, improperly solicits, requests or attempts to extort any money or anything of value from a Biotest's employee, the employee must refuse the solicitation, request, or extortionate demand and immediately report the event to the Compliance Department and/or the Legal Department. In case of extortionate demands involving threats to life or safety, such requests are not considered to be violations of this Policy but should be reported to the Compliance Department and the Legal Department.

(b) Corruption of Members of Biotest or Business Partners

Similarly, members of Biotest and Business Partners may not solicit, receive, or attempt to solicit or receive, directly or indirectly, a bribe, kickback, or other improper benefit or advantage in connection with a transaction contemplated or entered into by Biotest or the Business Partner.

4.2. Additional Responsibilities of Biotest Executives

Biotest executives shall ensure that the requirements of this Policy are communicated to all employees reporting to them and shall ensure that appropriate controls and actions are implemented to comply with the requirements of this Policy in their respective business areas.

4.3. Use of Service Providers and other Business Partners

Members of Biotest are prohibited from giving, promising, offering, or authorizing the payment or provision of things of value to or by Business Partners while knowing that all or a portion of such payment or thing of value will be offered, promised, or provided, directly or indirectly, to any Government Official or Other Covered Individual either (i) for an improper purpose, or (ii) where the member of Biotest or the Business Partner knows or believes that the acceptance of the thing of value by the Government Official or Other Covered Individual would itself constitute either a breach of an expectation of good faith or impartiality or a breach of trust by that person in his or her role as a Government Official or Other Covered Individual.

As used here, "knowing" includes an awareness or any reason to know that an improper payment or provision of things of value, or the promise, offer, authorization, or provision of such a payment or provision of things of value is being made or is likely to occur. Refusal to know, "conscious disregard", "deliberate ignorance" or "willful blindness" are treated as "knowledge" for purposes of this Policy.

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(a) Due Diligence

Members of Biotest must conduct and document reasonable due diligence before engaging any Business Partner. The type of due diligence should be commensurate with the potential risk based on the nature of the services to be performed by the Business Partner, the location where the services are to be performed, and other factors, including any identified specific concerns or risks (“red flags”). The due diligence should include an assessment of the basis applied by members of Biotest for selecting the Business Partner. Such selection should be based on factors that should include, among other things, cost or compensation, qualifications, and legitimate need for the goods or services to be rendered in favor of Biotest by the Business Partner. Due diligence should be renewed on a regular basis.

The Compliance Department may authorize members of Biotest to use a reputable organization to perform due diligence, but the ultimate decision regarding the appropriateness of the Business Partner must be made together with the Compliance Department.

(b) Contracts

Contracts or other agreements with Business Partners must be in writing and must specify in reasonable detail the services to be provided by the Business Partner and the consideration received in return. The length and scope of the engagement must be consistent with a bona fide business need. All payments must be reasonable and represent fair market value for bona fide services or products. Unless authorized by a specific internal policy or procedure, payment in cash, cash equivalents and bearer checks are strictly prohibited.

All contracts or other written agreements must be approved in advance by the Legal Department according to the rules provided by the relevant policy of the Legal department and/or - if so required under specific Compliance rules - the Compliance Department.

4.4. Financial and Accounting Controls

The financial statements, ledgers, registers and accounts of Biotest must reflect operations in a true manner and in accordance with accounting laws and principles. All books, records and accounts must be kept in reasonable detail to accurately and fairly reflect transactions and dispositions of assets. Adequate internal controls must be maintained to provide reasonable assurance that management is aware of, and directing, all transactions ethically and in compliance with Biotest’s policies. False, misleading, incomplete, inaccurate or artificial entries in Biotest’s books and records are strictly prohibited.

Members of Biotest will adhere to all Biotest financial and accounting policies and procedures, including but not limited to procedures for reimbursements, check requests and petty cash. All members of Biotest who prepare and review Biotest’s books and records, who are responsible for Biotest’s books and records, who supply information to be included in Biotest’s books and records and who submit any financial documents to be included in the books and records, such as requests for payments to any business partner or requests for reimbursement as part of their duties, are responsible for ensuring that the books and records are accurate.

Further, payments for any services rendered to Biotest by a Government Official or Other Covered Individual, including honorarium payments and reimbursements of expenses, shall be made by wire to a bank account in the name of the Government Official or Other Covered Individual within the Government Official’s or Other Covered Individual’s country, or by wire to a duly authorized correspondent bank within the country in which the relevant Biotest business

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operates. Any services rendered by a Government Official or Other Covered Individual to Biotest shall be executed through the corresponding written agreement that must be reviewed by the Legal Department and, as the case may be, other departments which are responsible for the review of contracts according to Biotest policies.

Violations of this Policy can include: false, incomplete or misleading reporting of expenditures; false, incomplete or misleading entries in Biotest's books and records; and the failure to report any transaction or expenditure. No employee may sign or submit, or permit others to sign or submit on behalf of Biotest, any document or statement that the employee knows or has reason to believe is false or misleading.

4.5. Concerns Arising from Interactions with Government Officials and Business Partners

Under certain circumstances, payments or other things of value offered, promised, or provided to Government Officials or Business Partners may raise potential concerns under anticorruption laws. For this reason, all members of Biotest and any Business Partner, as appropriate, should be fully knowledgeable regarding the following subjects.

Because local laws or regulations may vary, all members of Biotest must consult any existing local Biotest policies and/or procedures, in particular the "Country Cards" (Annexes to Annex 1 of the policy for Health Care Professionals) dealing with limits to hospitality and gifts to HCPs and the policy for gifts and hospitality for Non-HCPs. In case of questions or doubts, employees should consult with local management, the Compliance Department regarding local requirements.

(a) Travel and Meals/Hospitality

All expenses for travel and meals/hospitality for Government Officials or Other Covered Individuals may only be offered, promised, authorized, or provided for legitimate and bona fide business purposes and must comply with all applicable laws, rules and regulations (including, if different, the laws of the recipient's country). The travel and meals/hospitality must not raise the appearance of impropriety and must be of a type, manner, frequency, and expense that is ordinary and reasonable under local law, standards and customs. Any hospitality should be incidental to the business purpose. Expenses must be appropriately documented and reviewed.

(b) Business Courtesies/Gifts

Pursuant to Biotest's policies and procedures, business courtesies or gifts are permitted in limited circumstances. Such business courtesies or gifts to a Government Official or Other Covered Individual must be legal, nominal in value and offered, promised, authorized, or provided only for legitimate and bona fide business purposes, such as a courtesy or token of esteem. Business courtesies/gifts must not raise the appearance of impropriety; must be of a type, manner, frequency, and expense that is ordinary and reasonable under local law, standards and customs; and may never take the form of cash or cash equivalents (e.g., gift certificates or vouchers). Such business courtesies/gifts must also comply with and be permissible under all applicable laws, rules and regulations (including, if different, the laws of the recipient's country).

(c) Medical Education Grants and Charitable Donations

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With the intention of improving patient care and benefiting the public, Biotest may provide non-promotional funding to professional, educational and charitable organizations in the form of medical education grants and charitable donations. Any such grants and charitable donations must be for bona fide purposes and must be consistent with the terms of this Policy and the relevant Biotest procedures.

(d) Political Contributions

Neither Biotest nor any employee or Business Partner shall make, offer, promise, or authorize any political contribution on behalf of Biotest to a Government Official or political party.

(e) Clinical Trials and Other Studies

Biotest may sponsor legitimate clinical trials and other clinical or laboratory investigations. Because such studies may involve interactions with Government Officials, including health care professionals, members of Biotest must ensure that all payments made, offered, promised, or authorized in conjunction with such trials and investigations are reasonable at fair market value, and made for bona fide services, and that appropriate prior due diligence is conducted. All such trials and investigations must be conducted in accordance with applicable policies and procedures and approved protocols.

(f) Undertaking to pay costs for HCP's

In certain circumstances and to the extent permitted under applicable professional codes, Biotest may sponsor health care professionals to scientific or medical conferences by paying for the health care professional's travel, lodging, and conference costs. Such Undertaking to pay costs must never be offered, promised, authorized, or given to secure any improper business advantage or to obtain business and must be compliant with Biotest internal policies and procedure as well as applicable laws, rules and regulations.

(g) Product Promotion and Advertising

All promotion of Biotest products must comply with applicable laws, rules and regulations and internal policies and procedures. In certain countries, stricter standards than this Policy may be applied. Biotest employees are expected to consult with the local Information Officer, the Compliance Department or the Legal Department to ensure compliance with local legal requirements.

4.6. Health Care Professionals

In many countries, health care professionals are employed by the government directly or by government-owned or government-controlled institutions, and could be considered Government Officials.

In addition, in many regions where Biotest products are sold, there are local laws, rules and regulations that apply to interactions with health care professionals, including pharmaceutical industry codes, which may impose stricter standards than this Policy. Biotest is committed to complying with applicable laws, rules and regulations wherever it does business, and Biotest employees are expected to consult with local management or the Compliance Department or Legal Department to ensure such compliance.

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4.7. Joint Ventures and Mergers/Acquisitions

When evaluating potential joint ventures, mergers, acquisitions or similar business opportunities, members of Biotest must consult with the Legal Department on appropriate due diligence or other precautions before any business steps may be taken, including any preliminary business agreements (e.g., memoranda of understanding).

4.8. Facilitation Payments

A facilitation payment is a small payment made to a Government Official to secure or expedite the performance of a routine or necessary action (for example, issuance of a permit or license) to which the payer of the facilitation payment is entitled.

Facilitation payments to Government Officials are never permitted.

4.9. Training

Anti-corruption training is required for all members of Biotest. Training must also be provided for any new members of Biotest.

As appropriate and using a risk-based approach, Biotest shall provide anti-corruption training materials and/or promote awareness of Biotest's policies to Business Partners.

4.10. Audits

Biotest, through its office of Internal Audit, conducts regular audits of various departments and operations. As part of these audits or on an as-needed basis, Internal Audit may review and monitor anticorruption compliance, including by identifying any appropriate enhancements to procedures or business processes, reviewing contractual arrangements with Business Partners in Biotest's international operations.

4.11. Seeking Advice, Raising Concerns and Reporting Violations

Biotest wants to be promptly informed of any concerns regarding this Policy, so it can immediately address any issues. If you have any questions about this Policy or have a concern about a potential violation, you should promptly contact your supervisor (as applicable), the Compliance Department and / or the Legal Department. If you want to report anonymously you can do so through Biotest's SpeakUP helpline (see link in Biotest intranet and internet site).

Biotest will not tolerate retaliation of any kind against those who report, in good faith, a violation of the applicable laws, rules and regulations, or internal policies and procedures.

4.12. Employment Consequences and Legal Penalties

Violations of applicable anti-corruption laws can result in severe civil and criminal penalties and failure to adhere to this Policy may result in disciplinary action up to, and including, termination of employment in accordance with local laws.

5. RELATED POLICIES AND PROCEDURES

- Biotest Code of Ethics and Business Conduct
- Biotest Policy for Healthcare Professionals
- Policy on gifts and invitations
- Policy on distribution agreements and other agreements of Biotest Global Sales & Marketing

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