OURVITA

GROUP CODE OF ETHICS & CONDUCT

OURVITA

CONTENTS

1. INTRODUCTION

1.1. Why This Code Is Important

1.2. Who This Code Is For

1.3. Who We Are

1.4. Our Mission

2. OUR ETHICAL COMMITMENTS AND VALUES

2.1. Our Commitment to Ethics and Sustainability

2.2. Our Core Values

3. OUR RESPONSIBILITIES AT OURVITA

3.1. Helping our Customers to Help People with Quality Products

3.2. Conducting Business in Compliance with the Rules

3.3. Conducting business ethically: Anti-Bribery and Corruption

3.4. Responsible Relationships with customers, supplier and business partners

3.5. Gifts, Hospitality and Entertainment

3.6. Preventing and managing conflicts of interest

3.7. Creating a healthy and safe work environment

3.8. Respecting Communities and the Environment

3.9. Protecting our assets and Information

3.10. Responsible use of Artificial Intelligence

3.11. Anti money-laundering principles

4. IMPLEMENTATION OF THIS CODE

4.1. How this Code takes effect and is applied

4.2. How this Code is disseminated

4.3. Speaking Up and reporting Concerns

4.4. Policy conflicts

4.4. How this Code may be amended

INTRODUCTION

WHY THIS CODE IS IMPORTANT

This Code is not merely a "manifesto"; it has concrete and tangible value for our organization:

- **It defines who we are:** it allows us to explain to our stakeholders what we do and where we come from;
- **It showcases an important aspect of who we are:** it is a way to demonstrate our commitment to ethics and sustainability;
- **It strengthens relationships:** it allows us to ground our relationship with our stakeholders in shared values;
- **It serves as a "compass" for behaviours:** it clarifies what is right to do, helping us distinguish between appropriate and inappropriate behaviour;
- **It prevents problems:** it helps avoid situations that could lead to critical issues (sometimes even from a legal standpoint);
- **Improves the work environment:** by establishing rules of respect and collaboration, it helps prevent disputes, discrimination, or harmful tensions.

WHO THIS CODE IS FOR

This Code is binding on all persons acting on behalf of the Ourvita Group and its legal entities (the "Applicable Persons"), and in particular:

- Directors, statutory auditors, members of corporate bodies, and independent auditors;
- Employees, whether temporary or otherwise, full-time or part-time, without exception;
- Consultants, contractors, and temporary employees
- Other parties who, in any capacity and even on an occasional basis, act on behalf of the Group and its legal entities, such as, by way of example and without limitation, attorneys-in-fact, agents, collaborators, consultants, suppliers, and business partners.

Below are all the Legal entities of Ourvita, including the "known as" site names and location. These legal entities cover the sites which employ our colleagues

SITE NAME	LEGAL ENTITY	COUNTRY
OURVITA MINNEAPOLIS	Amerilab Technologies, Inc.	USA
OURVITA XUANCHENG	Braveiy Bioengineering (Anhui) Co., Ltd	China
OURVITA MORECAMBE	Design Plus Health & Beauty Limited	United Kingdom
OURVITA TREDEGAR	Eurocaps Limited	United Kingdom
OURVITA TURIN	Farmaceutici Procemsa S.p.A	Italy
OURVITA DUBLIN	HBI Health & Beauty Innovation	Ireland
OURVITA TAMPA	Ion Labs, Inc.	USA
OURVITA BERGAMO	OFI Officina Farmaceutica Italiana S.p.A.	Italy
OURVITA BREDDORF	Ourvita Germany GmbH	Germany
OURVITA LUBLIN	Laboratoria Natury sp. z o.o.	Poland
OURVITA KIRKHAM	Laleham Health and Beauty Limited	United Kingdom
OURVITA ALTON		
OURVITA LODZ	Master Pharm Spolka Akcyjna	Poland
OURVITA MIELEC		
OURVITA FELDKIRCHEN	Richard Bittner AG	Austria
OURVITA RUNCORN	Thompson and Capper Ltd	United Kingdom
OURVITA SWEDEN	Vitamex Manufacturing AB	Sweden

WHO WE ARE

Ourvita is a global Contract Development and Manufacturing Organisation (CDMO) specialising in nutrition and food supplements, medical devices and personal care products.

Operating across Europe, North America and Asia, Ourvita combines the expertise of long-established companies with a shared commitment to science, quality, innovation and sustainability.

Today, Ourvita operates 15 manufacturing and development sites across Austria, China, Germany, Italy, Poland, the United Kingdom and the United States, serving customers in more than 80 countries worldwide.

With over 3,000 employees, Ourvita supports leading global brands throughout the product lifecycle, from product development and formulation through to manufacturing, packaging and supply chain solutions.

While Ourvita was established as a unified group in 2024, the heritage of our companies extends back more than 225 years. The combination of these businesses has created a global organisation founded on scientific excellence, operational expertise and a commitment to improving health and wellbeing.



OUR HERITAGE

1798 Thompson & Capper established in Liverpool, United Kingdom

1939 Farmaceutici Procemsa established in Turin, Italy

1946 OFI Officina Farmaceutica Italiana established in Bergamo, Italy

1954 Richard Bittner AG established in Feldkirchen, Austria

1970 Laleham operations established in Alton, United Kingdom

1976 Laleham Kirkham operations established in Lancashire, United Kingdom

1983 Ion Labs established in Tampa, Florida, USA

1994 Eurocaps established in Tredegar, United Kingdom

1995 Amerilab Technologies established in Minneapolis, Minnesota, USA

2000 Design Plus established in Moreacambe, United Kingdom

2001 Laboratoria Natury established in Lublin, Poland

2002 Master Pharm established in Łódź, Poland

2009 Aakamp established in Breddorf, Germany

2024 Formation of the Ourvita Group and the acquisition of Braveiy Biotechnology, China

2025 Expansion of Ourvita through the integration of Health & Beauty Innovations businesses and Laboratoria Natury

Today, Ourvita represents a unique combination of scientific capability, manufacturing excellence and customer partnership, united by a common purpose and shared values.

OUR MISSION

IMPROVING PEOPLE'S QUALITY OF LIFE EVERY DAY

Our purpose is to help our customers bring safe, effective and innovative health and wellness products to consumers around the world.

WHY WE DO WHAT WE DO

- We create value for our customers, employees, investors and communities.
- We care deeply about the health, wellbeing and safety of the people who use the products we manufacture.
- We believe in science, innovation and evidence-based decision making.
- We seek to leave a positive legacy for future generations through responsible business practices.

HOW WE DELIVER OUR MISSION

CUSTOMER FOCUS

We succeed when our customers succeed. We strive to understand their needs and deliver products, services and solutions that exceed expectations.

QUALITY AND EXCELLENCE

We maintain an uncompromising commitment to quality, safety and regulatory compliance throughout every stage of product development and manufacture.

INNOVATION

We continuously improve our products, technologies, processes and services to meet evolving market needs.

RESPECT AND EMPOWERMENT

We respect everyone at Ourvita and aspire to create opportunities for our employees to grow, contribute and achieve their potential.

SUSTAINABILITY

We integrate environmental, social and governance considerations into our decisions to create long-term value for all stakeholders.

OUR ETHICAL COMMITMENTS & VALUES



OUR COMMITMENT TO ETHICS AND SUSTAINABILITY

At Ourvita, ethical conduct, sustainability and respect for people are fundamental to how we operate.

We are committed to conducting business responsibly, transparently and in compliance with applicable laws and regulations in every country where we operate.

We recognise our responsibility to protect the environment, respect human rights, support our communities and maintain the highest standards of governance.

Ourvita supports the principles of the United Nations Global Compact and aspires to progressively integrate these principles into its strategy, culture and day-to-day operations across the Group.

HUMAN RIGHTS

Ourvita is committed to respecting internationally recognised human rights principles, including:

- The United Nations Universal Declaration of Human Rights
- The United Nations Global Compact
- International Labour Organization Core Conventions

We maintain a zero-tolerance approach to:

- Child labour
- Forced labour
- Human trafficking
- Modern slavery
- Discrimination
- Harassment
- Retaliation against individuals who raise concerns in good faith

We expect the same standards from our suppliers, contractors and business partners.

ENVIRONMENTAL RESPONSIBILITY

We are committed to reducing the environmental impact of our operations by exploring and applying whenever possible solutions improving:

- Waste reduction
- Energy efficiency
- Responsible water management
- Sustainable packaging
- Responsible sourcing
- Continuous environmental improvement

RESPONSIBLE PROCUREMENT

We expect our suppliers to comply with this code of conduct and in particular with the values and commitments listed in section 2.

Supplier performance may be assessed through audits, questionnaires, certifications and risk-based reviews, assessing essential ethical and compliance perfromance.

We expect suppliers to fully comply with applicable laws and regulations of the countries in which they operate.

OUR CORE VALUES

INTEGRITY

We do the right thing, we are compliant with laws, regulations and policies.

CUSTOMER FOCUS

We build long-term partnerships by understanding and meeting customer needs.

QUALITY

We never compromise on product quality, safety or compliance.

INNOVATION

We continually seek better ways to develop products, improve processes and create value.

COLLABORATION

We work as one global team, respecting and supporting one another.

SUSTAINABILITY

We seek to create positive impacts for people, communities and the environment.



OURVITA

OUR RESPONSIBILITIES AT OURVITA

HELPING OUR CUSTOMERS HELP PEOPLE WITH QUALITY PRODUCTS

We were founded to improve people's quality of life, and their health is our top priority. We work every day to offer safe, effective, and high-quality products, developed with scientific integrity, transparency, and a sense of responsibility. We are committed to providing clear, accurate, and understandable information to our customers so that end consumers can make truly informed decisions.

To this end, we must all:

- focus the production process on achieving the highest quality in our products, without compromising on safety;
- cultivating a rigorous, science and evidence-based approach;
- invest in research, promoting responsible innovation;
- carefully select suppliers, choosing reliable and qualified partners to ensure high-quality raw materials and services;
- avoid and report conflicts of interest, always making impartial and objective decisions;
- evaluate feedback, suggestions, and needs from our customers, incorporating them into the continuous improvement of products, services, and processes.





CONDUCTING BUSINESS IN COMPLIANCE WITH THE RULES

We operate in a regulated industry, where compliance with laws, industry regulations, and high-quality standards is not only a duty but an essential prerequisite for ensuring consumer health and safety.

Product quality, consumer safety and regulatory compliance are fundamental to our business. Every employee has a responsibility to report quality, process and personal safety, compliance or ethical concerns as soon as they become aware of them. Concerns raised in good faith will be treated seriously and without retaliation. No commercial, operational or financial objective shall take precedence over product quality, consumer safety or regulatory compliance.

Quality concerns must be raised promptly and addressed without fear of retaliation.

For this reason, we must all:

- Comply with all applicable laws, rules, and standards, including all applicable export control, customs, sanctions and international trade regulations.
- Strictly adhere to good manufacturing practices and all applicable quality standards, ensuring that products are always safe, effective, and compliant with regulations.
- Respect roles and responsibilities throughout the production process.
- Adhere to internal procedures designed to ensure compliance with regulations and prevent risky or non-compliant behaviour.
- Accurately record every operation, follow procedures and ensuring the truthfulness and accuracy of company information.
- Cooperate with the relevant authorities, including during any inspections, by providing reliable and complete information in a timely manner and complying with all instructions received.

Entering or prospecting business relationships with countries or persons that may be subject to embargo constraints have to be cleared with the CCO first.

CONDUCTING BUSINESS ETHICALLY

Ethical conduct is fundamental to our success and reputation. We are committed to conducting all business activities honestly, fairly and responsibly.

ANTI-BRIBERY AND CORRUPTION

Ourvita maintains a zero-tolerance approach to bribery and corruption where facilitation payments and unofficial payments are prohibited regardless of local custom or business practice.

No director, employee, contractor, consultant, supplier or representative may:

- Offer or provide a bribe or improper payment
- Request or accept a bribe or improper payment
- Use gifts, hospitality or entertainment to improperly influence business decisions
- Facilitate corrupt or unethical business practices including, but not limited to;
  - Price fixing
  - Market allocation
  - Bid rigging
  - Anti-competitive agreements
  - Improper exchange of commercially sensitive information

All business decisions must be based on objective criteria and legitimate commercial considerations.

All employees becoming aware of any bribery or corruption practices must inform Human Resources promptly.

Cash transactions above an amount of Euro 1000 are prohibited, higher amounts have to be routed through traceable solutions, like bank transfers or credit card.





RESPONSIBLE RELATIONSHIPS WITH CUSTOMERS, SUPPLIERS AND BUSINESS PARTNERS

The success of the Ourvita Group depends on the trust placed in us by our customers, suppliers, business partners and other stakeholders. We are committed to building relationships based on integrity, transparency, professionalism and mutual respect. Business decisions must always be made objectively and in the best interests of the Group, without being influenced by personal gain, inappropriate incentives or undue pressure.

To this end, we must all:

- Treat customers, suppliers and business partners fairly, honestly and respectfully.
- Select suppliers and partners using objective criteria such as quality, capability, service, price, reliability, sustainability, compliance and commercial suitability.
- Avoid any conduct that could create the appearance of favouritism, improper influence or unfair treatment.
- Ensure that all marketing, technical, quality and regulatory information provided to customers is accurate, truthful and not misleading.
- Honour contractual commitments and communicate openly when challenges or issues arise.
- Protect confidential information received from customers, suppliers and business partners.
- Conduct negotiations and commercial discussions fairly and in good faith.
- Report any concerns regarding unethical conduct, fraud, corruption or other inappropriate business practices.



GIFTS, HOSPITALITY AND ENTERTAINMENT

The exchange of reasonable business courtesies of modest nature can support legitimate business relationships. However, gifts, hospitality or entertainment must never influence, or appear to influence, business decisions.

Employees and representatives must not:

- Offer, provide, request or accept gifts, hospitality or other benefits intended to secure an improper advantage.
- Accept or offer gifts of value deemed to be above 200 euro in any circumstances.
- Accept cash or cash equivalents, of any value.
- Offer or accept excessive, lavish or inappropriate hospitality.
- Provide gifts or hospitality that could compromise, or appear to compromise, impartial decision making.

Exceptions must be approved by the CEO.

Any gifts or hospitality must comply with applicable laws, local requirements and company policies.

Where interactions occur with healthcare organisations, regulatory authorities or government officials, employees must ensure that such interactions are ethical, transparent, appropriately documented and compliant with applicable laws, regulations and industry standards.

No payment, gift, hospitality or benefit may be offered or provided with the intention of influencing professional judgement, purchasing decisions or regulatory outcomes.



PREVENTING AND MANAGING CONFLICTS OF INTEREST

We operate with integrity and transparency, making decisions guided solely by the best interests of the company, customers, consumers, and stakeholders.

We recognize that conflicts of interest—even potential ones—can undermine trust and the impartiality of our decisions.

For this reason, we act responsibly to prevent such situations and manage them correctly and transparently, ensuring that personal interests or external relationships do not influence our work.

To this end, we must all:

- avoid situations in which personal, family, or financial interests may conflict with those of the Group;
- promptly report any situations of conflict of interest, even potential ones, in accordance with established procedures;
- Supervisor – Direct report relationships whereby both come from the same family or are in a partnership require notification of the respective SLT member so that conflict of interest can be proactively avoided
- make decisions in an impartial, objective manner based on professional criteria;
- ensure transparency in our relationships with suppliers, partners, and other stakeholders;
- refrain from activities or conduct that could compromise the Group's independence of judgment or integrity.

CREATING A RESPECTFUL, HEALTHY AND SAFE WORK ENVIRONMENT

All our achievements begin with our workplace community. Our people represent our greatest asset, comprising skills, ideas, experiences, and diverse perspectives. We are therefore committed to creating a positive, fair, and stimulating work environment where everyone feels secure in the protection of their rights, needs, and working conditions.

We respect employees' rights to freedom of association, collective bargaining and employee representation, including through recognised trade unions and works councils where applicable.

Every individual has the right to be treated with dignity and respect. We do not tolerate intimidation, bullying, harassment, abuse of authority or behaviour that creates a hostile working environment.

We ensure safe and dignified working conditions, adhering to standards, procedures, and behaviours that protect the health, safety, and well-being of everyone.

Every employee has the authority and responsibility to stop work and immediately raise the issue to their supervisor if they believe a situation presents an immediate risk to health and safety.

We promote an inclusive, diverse, and equitable environment that respects human rights and equal opportunities for all, avoiding any discriminatory or harassing behaviour, or conduct that may cause discomfort or exclusion. We foster collaboration and mutual listening, contributing to constructive professional relationships and a positive work environment.



RESPECTING COMMUNITIES AND THE ENVIRONMENT

We recognise that our responsibilities extend beyond our facilities and into the communities and environments where we operate.

We therefore commit to respecting local communities and cultures, minimizing environmental impacts and waste, and using natural resources responsibly.

PROTECTING OUR ASSETS AND INFORMATION

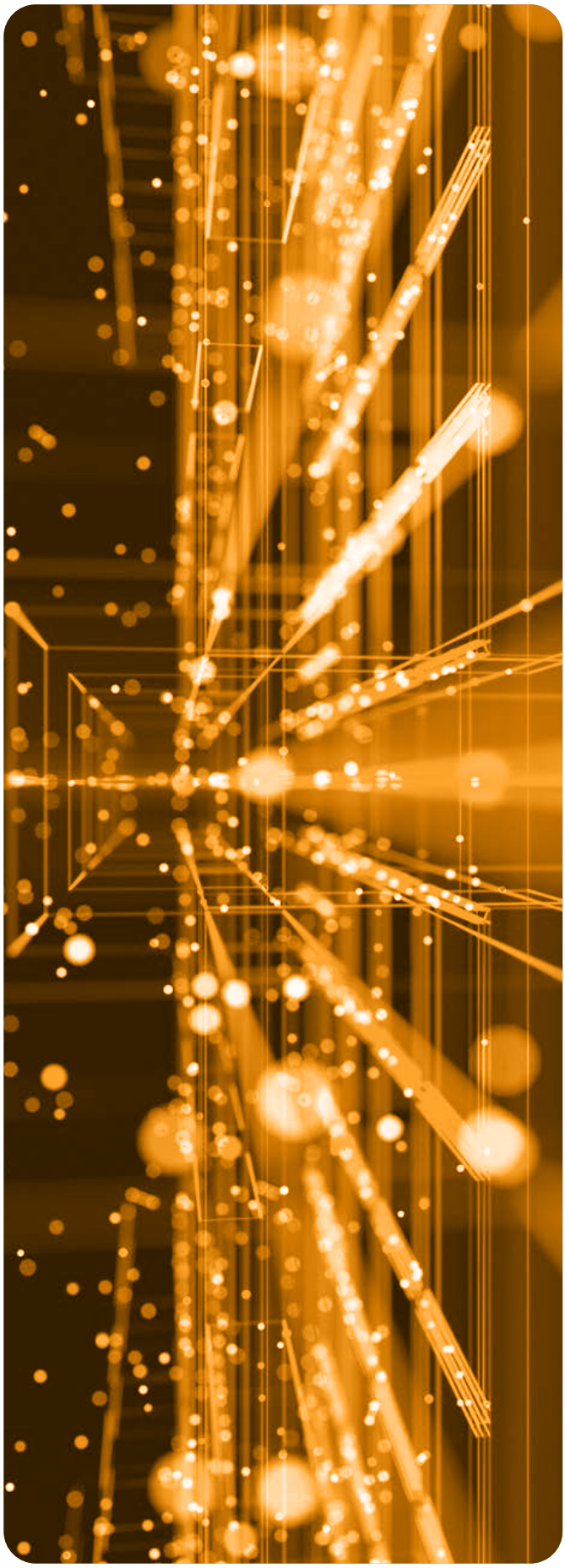
Our assets and data enable us to carry out our business every day: processes, formulations, knowledge, devices, equipment, and our collective know-how form a complex system that must be protected so that we can make daily progress toward our goals. The loss, theft, or misuse of our tangible and intangible assets can therefore hinder our business and undermine our efforts.

Included in this we are committed to protecting personal information and respecting privacy rights. Personal data relating to employees, customers, suppliers and consumers shall only be collected, processed, stored and shared for legitimate business purposes and in accordance with applicable privacy and data protection legislation.

For this reason, we must all:

- use machinery, devices, and equipment only for authorized business purposes.
- store and use tools and equipment properly to ensure their integrity, safety, and longevity.
- Immediately report any loss, theft, malfunction, or suspicious use.
- Protect employees' data
- Treat confidential information, technical documents, processes, and company know-how with the utmost confidentiality, in compliance with company policies on privacy and cybersecurity





RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE

Artificial Intelligence and digital technologies offer significant opportunities to improve efficiency and innovation. However, they must be used responsibly.

Employees must:

- Use AI tools only for authorised business purposes
- Protect confidential company, customer and supplier information
- Avoid uploading proprietary information and sensitive business and financial data into AI platforms, unless vetted and approved by IT for specific use and only in pre-approved high-security tools.
- Verify AI-generated content before use
- Ensure regulatory, quality and technical documentation receives appropriate human review
- Comply with all data protection and cybersecurity requirements

Users remain accountable for decisions supported by AI-generated information

Please refer to the group official AI policy for further details.

ANTI MONEY-LAUNDERING PRINCIPLES

Ourvita is strictly committed to complying with all applicable anti-money laundering and counter terrorist financing laws worldwide, accordingly to country legislations.

We do not tolerate, facilitate or participate in money laundering or any activities that disguise the origin of illegal funds.

All employees and partners operating at and with Ourvita are required to apply proper due diligence, verify partners identities and maintain accurate financial records.

All employees and stakeholders are required to promptly report any suspicious transactions to the group CFO.

IMPLEMENTATION OF THIS CODE

HOW THIS CODE TAKES EFFECT AND IS APPLIED

This code is adopted by resolution of the Group Board of Directors of the Ourvita Group, which approves its content and establishes the date on which it takes effect.

The Code is valid in all countries where the Group operates, taking into account the cultural, social, and economic differences of local contexts, and applies to all Group Companies and to the Addressees to whom it applies. Executive leadership and local management teams are responsible for implementing and promoting the values and its principles throughout the organisation.

All employees, contractors and business partners are expected to understand, comply with and uphold the requirements of this Code. Ethical behaviour is a shared responsibility and an essential part of how we conduct business as One Ourvita.

Each Group Company ensures the proper application of the Code and promotes conduct consistent with the ethical principles shared at the Group level, ensuring that its content is integrated into internal processes and effectively implemented.



HOW THIS CODE IS DISSEMINATED

The Code of Ethics is a fundamental tool for guiding behaviour, decisions, and relationships within the Group. Its effectiveness depends on all Addressees having full knowledge and understanding of it. For this reason, the Code is made easily accessible via the corporate website, internal documentation, email, or digital platforms, and is shared upon hiring, when initiating external collaborations, and when establishing relationships with other stakeholders.

Internal communication and training are currently areas of development for Ourvita as an international group, and the group aim to progressively provide further tools and solutions.

SPEAKING UP AND REPORTING CONCERNS

Every employee has both the right and responsibility to raise concerns when something does not seem right.

Speaking up helps protect our people, customers, consumers, reputation and business.

Concerns may relate to:

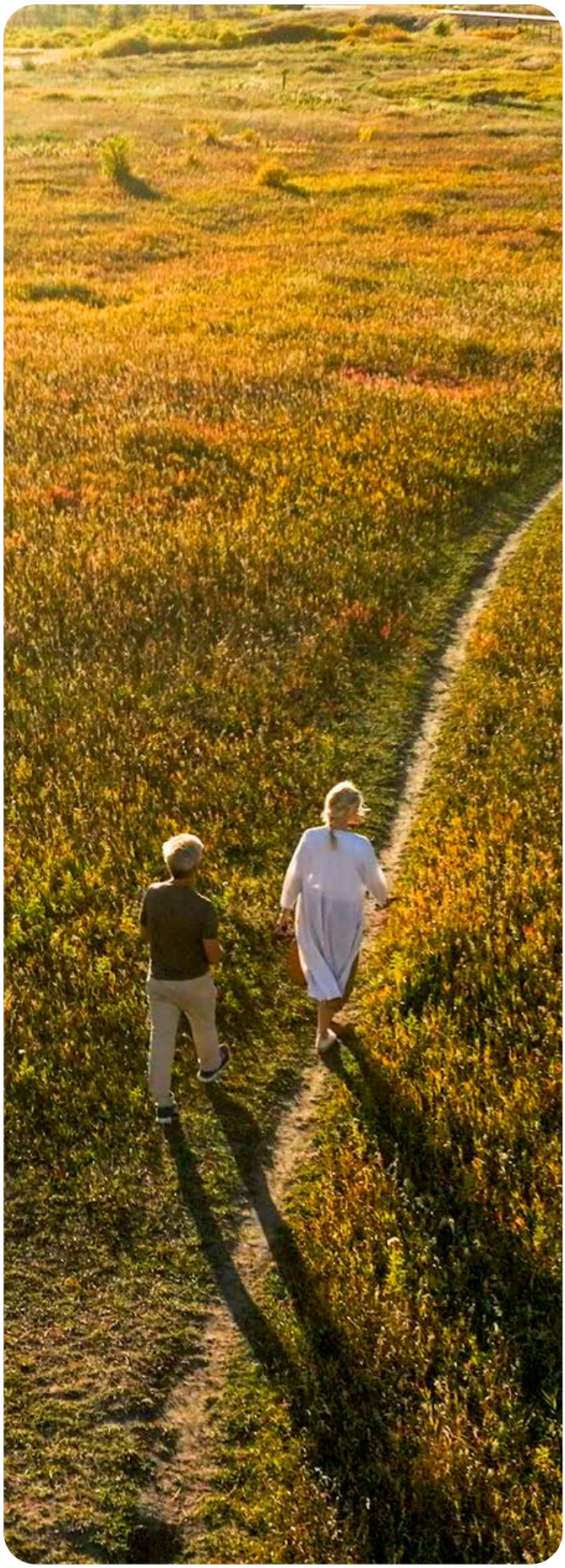
- Safety
- Quality
- Ethics
- Human rights
- Harassment
- Discrimination
- Environmental issues
- Fraud
- Corruption
- Violations of laws, regulations or company policies

Reports may be made through Senior Management, Human Resources, or the Whistleblowing System where implemented.

Ourvita prohibits retaliation against anyone who raises concerns in good faith or participates in an investigation.

Intentionally false or malicious reports are prohibited.





POLICY CONFLICTS

The Code of Ethics is based on established international legal principles, best practices and ethical standards common to all Group companies.

In the event of a conflict between the provisions of the Code and local regulations, the laws of the country shall prevail, without, however, compromising the Group's fundamental ethical principles. Where local laws impose requirements that exceed the standards set out in this Code, the higher standard shall apply. Nothing in this Code is intended to limit any legal rights granted to employees under applicable local legislation.

HOW THIS CODE CAN BE AMENDED

Amendments or updates to the Code are made in writing and require the formal approval of the Group Board of Directors, which resolves on the changes in order to adapt the document to new regulations, organizational changes, or developments in the Group's values and strategies. Each proposed revision is reviewed by the relevant bodies and functions to ensure consistency with the Group's principles and values. Approved amendments are communicated to all recipients by releasing the new version and become binding as of the date indicated in the communication.

Group Companies promote awareness of the Code and ensure its application, including following updates, guaranteeing consistency with the guidelines and values shared at the Group level.

OURVITA