

Arcera Code of Ethics

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1. Message from the CEO

Dear Team,

As we navigate the dynamic landscape of the pharmaceutical and life sciences industry, it is imperative that we not only strive for innovation and excellence but also uphold the highest standards of integrity and ethics.

Herewith is Arcera's Code of Ethics, a comprehensive framework that articulates our collective commitment to conducting business with unwavering integrity, transparency, and accountability. This policy embodies the values that define us at Arcera and sets forth clear guidelines for ethical decision-making and behaviour across all levels of our company.

At Arcera, we recognize that our actions not only impact our stakeholders but also contribute to the broader communities we serve. As such, our Code of Ethics ensures that we uphold the trust placed in us by patients, healthcare professionals, shareholders, and society at large.

Our Code of Ethics emphasizes our compliance with applicable laws and regulations, ethical conduct, protection of confidential information, conflict of interest management and reporting and accountability.

As we embark on this journey together, I urge each and every one of you to familiarize yourselves with our Code of Ethics and integrate its principles into your daily practices. By upholding these standards with diligence and dedication, we reinforce our commitment to ethical excellence and ensure that Arcera remains a trusted leader in the pharmaceutical and life sciences industry.

Thank you for your dedication to our shared values. Let's embrace this Code of Ethics to guide our actions, support our growth, and make a positive impact.

Warm regards,

Isabel Afonso
Chief Executive Officer
Arcera

2. Applicability of this Code of Ethics

This Code of Ethics applies to all employees (including temporary or part-time employees, interns or trainees), directors and officers of Arcera Life Sciences - L.L.C - O.P.C., as well as its subsidiaries (“Arcera”). It also applies to third party consultants and contractors working with Arcera who either have access to our premises and/or our IT systems (“External Service Providers”). It is each such person’s personal responsibility to understand and comply with the Code.

All Arcera employees, directors, officers and External Service Providers will receive training on this Code. Managers should ensure that their team members fully understand and comply with the principles and standards contained herein.

We expect third parties with whom we work, and those who conduct business on Arcera’s behalf, to comply with all the principles in this Code of Ethics, or equivalent principles in their own policies, and to have an effective management system in place to ensure such compliance.

3. We live our core values

At Arcera, our core values are the foundation of our ethical practices:

- **Trust:** Commitment to transparency, integrity, and accountability in every interaction. We build long-lasting relationships with stakeholders based on mutual respect, consistency, and reliability, guided by strong ethical practices.
- **Agility:** Determination to navigate challenges and seize opportunities in an ever-changing environment. Flexibility to ensure we can foresee and quickly adapt to market dynamics, staying resilient and focused on delivering value for our customers and shareholders, while positively impacting the lives of patients.
- **Innovation:** Focused on reducing the disease burden for patients and supporting healthcare systems by differentiating products and market approach. Driving cutting-edge solutions and automation to improve operational efficiency and deliver on our commitment to sustainability.
- **Collaboration:** Building strong relationships with colleagues across Arcera, stakeholders, and industry peers, we amplify our ability to address global health challenges and drive collective impact.

4. We are committed to responsible business practices

At Arcera, we conduct our global operations in alignment with the highest legal and ethical standards. We consistently meet—and often exceed—the regulatory requirements of the countries where we operate, reflecting a strong respect for both local and international laws. In cross-border activities, we apply the most rigorous applicable standards to ensure consistency, transparency, and integrity across jurisdictions. When

navigating complex legal environments, we work proactively with our Legal and Compliance teams to ensure clarity, accountability, and confidence in every decision we make.

Good Practice Standards

As a manufacturer of pharmaceutical and consumer healthcare products, we embed our ethical values throughout our operations, ensuring that integrity and responsibility guide every stage of the product journey, from development, to manufacturing, distribution, and drug safety. Arcera's dedication to good practice standards or "GxP" is driven by our culture that values transparency, sound judgment and accountability.

Our comprehensive quality management system is not merely aimed at meeting legal requirements; it represents our deep commitment to continuous improvement and proactive management of risks, prioritizing the health of patients and scientific integrity by ensuring that every product is reliable, safe and of consistently high quality.

Fair Competition

At Arcera, we are committed to conducting business with transparency, fairness, and respect for competitive markets. We actively foster an environment where collaboration and innovation thrive within the boundaries of applicable competition laws. Our teams engage with industry peers and partners in ways that promote healthy market dynamics, ensuring that all exchanges and agreements are grounded in ethical and lawful practices.

We take pride in building strong, principled relationships with our distributors, licensing partners, vendors, services providers and other business partners. Our approach is rooted in mutual respect and fairness, and we ensure that all terms and conditions reflect our commitment to ethical business conduct and fair competition. By prioritizing honest communication and responsible practices, we create long-term value and trust across our global network.

Business Partnering with Integrity

At Arcera, we build trusted relationships with business partners by upholding the highest standards of integrity, fairness, and accountability in all our interactions. We engage with business partners in a transparent and respectful manner, ensuring that our collaborations are appropriate, well-documented, and aligned with our ethical standards.

We have a zero tolerance for bribery, fraud and corruption, internally and in our dealings with business partners. We monitor and promptly investigate any suspected misuse of funds, resources or improper transfers of value.

We foster trustworthy and professional relationships with third parties by limiting gifts, hospitality, and entertainment to modest, transparent gestures that reflect thoughtful, ethical business practices and align with our values.

We engage third parties - such as suppliers, service providers and distributors - who are committed to strong ethical practices, including anti-bribery and anti-corruption, labour rights, health, safety and environmental protection, and have the necessary management systems to support such practices. Our selection process is based on fair due diligence and sustainable procurement, aligned with international guidelines for responsible sourcing.

At Arcera, we take the trust our business partners place in us to heart. We transparently share information on our business practices, standards and processes that impact our partners, respond proactively to all reasonable inquiries and escalate information in line with our contractual commitments.

We respect the property rights of third parties and ensure that our teams are properly trained to avoid any misappropriation or infringement of third party rights or confidential information.

Working with Public Officials

We adhere to the highest of ethical standards as well as all legal requirements when interacting with public officials, including public officers or employees of a government or any of its departments, agencies, or enterprises. We are fully transparent in all our interactions with public officials and never provide an improper incentive to act or refrain from acting.

We always provide accurate and complete information to government officials and agencies. We comply with the government requirements communicated to us, and we pass on such requirements to any third parties working with us and ensure that these are followed.

Protecting Personal Data and Privacy

We respect the privacy rights of our employees, patients, healthcare professionals and others. We process personal data only in accordance with applicable data protection laws and safeguard the personal data within Arcera's premises and systems against accidental loss, destruction, unauthorized access, use, modification, and disclosure. We have robust systems and procedures in place to manage any data breach or incident with personal data in a proactive and responsible manner.

We disclose or transfer personal data to third parties only when legitimate grounds to do so have been established and appropriate measures have been taken to ensure the adequate protection of that personal data, in compliance with applicable laws.

5. We are committed to positively impacting the world around us

We strive to operate in ways that respect the planet and support the well-being of communities, integrating care for the environment and social responsibility in our everyday decisions and long-term strategies. Through innovation and collaboration with stakeholders, we aim to create lasting value that benefits both society and the environment, while fostering a culture of responsibility and continuous improvement.

Support for the Healthcare Community and Patients

We interact with the healthcare community in diverse ways to support scientific progress and make a meaningful difference in the lives of patients around the world. In all of our interactions, we uphold the highest standards of integrity and professionalism, always respecting pharmaceutical industry standards and prioritizing patient care.

When we engage with Healthcare Professionals, we do so ethically and transparently, and only for legitimate scientific or educational purposes, never to improperly influence prescribing or purchasing decisions. We ensure that all marketing and promotional practices and materials that are accurate, fair, balanced, and aligned with ethical standards and applicable regulations.

Our interactions with patients provide valuable insights into the patient journey, helping us better understand unmet needs, disease burdens, and quality-of-life challenges. These perspectives guide our pursuit of innovative solutions that address urgent health issues and contribute positively to society. At the heart of each interaction is a deep respect for patients, their families, and caregivers.

By consistently upholding the highest ethical standards in all our interactions with the healthcare community and patients, we earn and maintain the trust placed in us by patients, healthcare professionals, and society at large.

Human Rights

We uphold human rights. We adhere to all requirements set out in national law or international standards with regard to human rights, including prohibitions on child and forced labour and other forms of involuntary labour. We only work with suppliers that share our values and refuse to work with suppliers that are found to use such forms of labour.

Environmental Impact

We care about the planet. We assess our impact on the environment and make concerted efforts to reduce such impact by reducing our carbon emissions, minimizing our waste, reducing water use and avoiding water contamination.

We strive to always evaluate the potential environmental impact of our projects as early as possible. We aim to reduce the use of resources wherever feasible and are guided by the principles of a circular economy.

Responsible Use of Information

At Arcera, we handle confidential and market-sensitive information with the utmost care and integrity. We maintain strict confidentiality around any nonpublic information entrusted to us. Employees must not misuse confidential or non-public information to gain an unfair advantage in the buying or selling of securities. This includes refraining from sharing such information with others who might act on it.

Promoting Financial Integrity

We do not tolerate fraud. We uphold all anti-money laundering and terrorist financing regulations and partner only with individuals and organizations sharing our commitment to ethical and lawful business practices. By ensuring that all funds and resources come from legitimate sources, we help safeguard the integrity of our operations. When concerns arise, we act swiftly and responsibly to uphold the law and protect our reputation.

Responsible Innovation

At Arcera, we pursue innovation with integrity and a deep respect for human dignity. Our development activities—including clinical trials—are conducted in accordance with the Declaration of Helsinki, all legal requirements and international standards, and with a strong focus on patient safety and scientific rigor. We are committed to transparency in our innovation efforts, sharing relevant information responsibly while safeguarding privacy and proprietary data. By embedding ethical principles into every stage of innovation, we aim to deliver meaningful health solutions that serve patients, society, and the future of medicine.

Ethical Global Trade

Arcera conducts international business in full compliance with applicable trade laws and regulations, including all applicable export controls and sanctions. We expect the same level of diligence from our partners, ensuring that our global operations reflect our

respect for global efforts to promote peace, security, and human rights, especially in regions affected by conflict or instability.

6. We are committed to protecting our assets

We are committed to managing our assets with integrity, transparency, and accountability, ensuring that every decision supports the long-term value and sustainability of our business. In all our operations, we act in the best interest of our shareholders by safeguarding company resources and making prudent, ethical choices that foster trust and financial resilience.

Conflicts of Interest

At Arcera, we ensure that the personal and private interests of our employees do not negatively impact our business decisions. Our employees do not pursue personal interests, in their own favour or in favour of their family members, friends and partners, which are contrary to those of Arcera. In case of a risk of our personal interests or outside activities influencing our business judgment or decision-making on behalf of Arcera, we disclose the conflict of interest and cooperate to ensure its proper management.

Accurate Books, Records and Public Disclosures

We maintain accurate and transparent records across all aspects of Arcera's operations. From financial transactions and tax reporting to research outcomes and quality data, we ensure that all required information is documented with precision and integrity. Our processes are guided by clear internal controls, including our delegation of authority charter, to ensure that every payment and transaction is properly authorized and recorded. By consistently meeting our public reporting and tax obligations, we demonstrate our commitment to responsible governance and operational excellence.

Protecting Company Property

We handle company property with care, whether tangible or intangible, and return the same upon termination of our affiliation with Arcera.

At Arcera, we are committed to protecting all forms of Company confidential information, including business plans, financial information, pricing proposals and all other non-public information. We only share confidential information when we possess the appropriate authorization to do so, the appropriate protections are in place (e.g., a confidentiality agreement) and the recipient has a valid "need to know". We follow all laws and regulations regarding the protection and processing of data.

We protect our intellectual property, including copyrights, know-how, patents, trademarks, and trade secrets. We ensure the creations, inventions and technology that give us a strategic advantage are safeguarded based on the latest security standards.

We do not make copies of reports or documents for our own personal use, nor do we archive them for such purposes. We retain or discard records only in accordance with internal record retention policies. We do not dispose of any records that are subject to a legal hold notice, even if they are being held beyond required retention periods.

Responsible Use of Technology and Company Devices

At Arcera, we embrace digital innovation responsibly, ensuring that our use of technology—including artificial intelligence (AI)—is guided by ethical principles, transparency, and accountability. We expect our teams to use digital tools thoughtfully, avoid bias, safeguard data, and comply with applicable laws, industry standards, and internal policies.

All Company IT resources, including devices, software, and data systems, are used for business purposes in serving the interests of Arcera. Arcera is committed to ensuring that any private use of Company IT resources is exercised with sound judgment and never compromises the security or integrity of our systems. We strictly prohibit the production or access of discriminatory, offensive, or otherwise inappropriate content on company systems.

All data created or stored on Arcera systems is considered company property and may be monitored in accordance with employment and data privacy laws. We take proactive steps to safeguard data, assess the impact of emerging technologies, and report any suspected breach, misuse, loss or vulnerability immediately.

Responsible External Communication

We ensure that all publications about the Company receive appropriate internal approvals. This includes the publication of information or the release of statements on behalf of Arcera. We forward all media inquiries to official company spokespersons.

When communicating with external stakeholders, we take care to protect the reputation of Arcera. In all our interactions, we are transparent about our affiliation with the Abu Dhabi Developmental Holding Company PJSC (“ADQ”) and mindful of all Company policies and procedures, including this Code of Ethics.

When speaking publicly including on social media, we make clear whether we are presenting on our own behalf (e.g., by incorporating a disclaimer that the views expressed

are our own and not necessarily those of Arcera), or on behalf of Arcera. We ensure that all public presentations on behalf of Arcera are reviewed and approved internally by the respective subject matter experts and managers.

We do not post deceptive, inaccurate, misleading, confidential, or defamatory statements on social media, nor do we comment on Arcera products or competitors. We report any knowledge of persons not directly employed by any Arcera legal entity utilizing the Arcera trademark or company name on any social media. This includes employees of vendors, suppliers, distributors and any other third parties acting on behalf of Arcera.

7. We are committed to our employees

Our people are our greatest strength. We foster a working environment that prioritizes well-being, encourages professional growth, and promotes open communication—ensuring everyone feels valued, heard, and empowered to act with integrity and speak up if something goes wrong. We uphold fair and safe working conditions for all, guided by principles of dignity, equity, and respect.

Ethical Leadership and Feedback Culture

At Arcera, we lead with integrity. Ethical leadership means more than just following rules—it involves actively integrating ethical thinking into how we manage our teams and how we make business decisions.

Our leaders are expected to model ethical behavior, empowering teams to act responsibly and creating a safe space where feedback can be shared and any ethical dilemmas can be discussed. This approach ensures that ethical considerations are not an afterthought but a core part of how Arcera operates.

At Arcera, we value open and honest communication. We adopt a growth mindset and value feedback. We encourage everyone to share their views respectfully and constructively, to foster a workplace built on trust, collaboration, and shared purpose.

Creating a safe and supportive environment where our employees can thrive is central to our mission. This translates into our commitment not only to physical safety, but also psychological safety and mental well-being. In turn, we expect our employees to treat everyone with respect, be honest, conduct themselves with integrity in all situations, and embrace accountability.

Diversity, Equity and Inclusion

Within Arcera, we treat each other with fairness and respect and fight against unconscious biases. This translates into zero tolerance for any form of bullying, harassment and discrimination, regardless of whether based on gender, nationality, race, colour of skin, religion, creed, age, ethnic background, civil status, pregnancy, disability, genetic information, gender identity, sexual orientation, political or trade union affiliation, or any other protected status.

Fair Compensation and Employee Development

We provide our employees with fair and competitive wages based on performance and according to applicable labour laws, including minimum wages, working hours and benefits. Beyond fair compensation, we are committed to supporting our employees' continuous development by fostering opportunities for learning, growth, and career advancement. We believe that investing in our people not only strengthens individual capabilities but also contributes to the long-term success and integrity of our organization.

Freedom of Expression and Association

We protect employees' right to freedom of expression and speech, consistent with our commitment to Arcera. Employees are free to express their personal political views and to engage in political activities outside of working hours and using their personal communication channels, without fear of retaliation or discrimination in the workplace.

Employees are free to join labour associations and political parties of their own choosing and to be part of, or included in, collective bargaining.

Environment, Health and Safety

Providing safe working conditions to protect employees from health hazards and injuries is an important part of our commitment to our employees. We ensure adherence to applicable laws and regulations related to the environment, occupational hygiene & safety, and we take steps to promote both physical and mental well-being.

We are proactive in assessing risk and implementing protective measures to avoid any potential for hazardous work conditions. Employees are encouraged to report any incidents and accidents, which are always followed by an investigation.

Speak-Up Program

We all have a personal responsibility to speak up if we see or suspect wrongdoing, including any violation of an Arcera policy or applicable law. Employees are encouraged to report any actual or suspected incident to their managers, the People & Culture team or the Integrity & Compliance team. In addition, Arcera maintains a state-of-the-art Speak-up platform, supported by leadership and regular training, where both internal and external reporters with knowledge or a good faith suspicion of wrongdoing can raise their concerns, anonymously if preferred.

We protect reporters who speak up in good faith against any form of retaliation, even if the report proves to be unfounded. On the other hand, we never misuse reporting lines in bad faith against fellow colleagues, with unfounded or defamatory claims.

We review all reports carefully and, where appropriate, investigate the allegations in a timely manner. Investigation teams share information regarding reports on a need-to-know basis and, if a reporter has chosen to remain anonymous, takes all reasonable efforts to protect identities.

This Code is our commitment to our business partners, the healthcare community, our shareholders and our employees, as well as the patients we serve and society as a whole. This commitment means that we do not tolerate breaches of this Code. If substantiated, a violation may result in corrective and/or disciplinary measures or legal actions up to and including termination of employment or contract with Arcera.