



CODE OF CONDUCT

Excellence and Integrity in All That We Do

A LETTER FROM OUR CEO

Dear Colleague,

Simtra is committed to delivering vital injectable products that improve patient care worldwide. Our mission is clear—to have an unwavering focus on integrity, high-quality, and technical expertise as well as delivering on our commitments. Our Code of Conduct is the framework that guides our actions and holds us accountable to these standards.

To strengthen our culture, we have launched an enhanced leadership competency model that defines how we lead, builds self-awareness, improves team effectiveness, and fosters greater organizational engagement aligned with our Code.

Simtra's success depends on the trust of our customers, regulators, partners, and patients. Our Code reflects our commitment to integrity and transparency. These values are not just aspirational—they drive how we operate every day.

I am asking you to please read our Code. If you have questions, ask. If something doesn't seem right, speak up. Speaking up isn't optional; it's a core part of our commitment to accountability to our patients, our customers, and one another. By following this Code and embracing our vision to be the premier CDMO, Simtra will continue to distinguish itself through operational excellence and integrity at every level.

Franco Negron
CEO



A LETTER FROM OUR CHIEF COMPLIANCE OFFICER

My name is Mike Loffredo, and I'm honored to introduce myself as Simtra's new Chief Compliance Officer. With over 25 years of legal and compliance experience, I'm excited to bring my background to Simtra and to work alongside you as we continue strengthening our Compliance Program together.

As Franco mentioned, Simtra's success depends on the trust placed in us by our customers, regulators, partners, and patients. That trust depends on the choices we make every day—how we work, how we treat each other, and how seriously we take our responsibilities. Our Code of Conduct is designed to support those choices and to reinforce a culture grounded in respect, reliability, and integrity.

Please take time to review our Code. If you have questions or would like to discuss a concern, please don't hesitate to reach out. Speaking up helps us prevent small issues from becoming big ones, it strengthens our culture of integrity, and ensures that Simtra remains a place where everyone can do their best work with confidence.

Mike Loffredo
Chief Compliance Officer



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OUR PURPOSE

Bring vital injectable products to our customers' patients worldwide.

OUR VISION

Be the premier contract development and manufacturing organization for injectable products.



OUR MISSION

To have an unwavering focus on integrity, high-quality, and technical expertise as well as delivering on our commitments.

MAKE IT HAPPEN

Bring a growth mindset to every opportunity, developing new skillsets, and exceeding our expectations and those of our customers.

MAKE IT TOGETHER

Work as one, respecting each voice and tapping into our unique strengths across teams—so to solve problems in new ways.

MAKE IT RIGHT

Hold ourselves to a high standard of excellence, fulfilling our commitments to the customer, their patients, and our team members.

MAKE IT COUNT

Take pride in our day-to-day work—taking on challenges big and small to improve patient health.

OUR VALUES GUIDE OUR ACTIONS

Why Our Code Matters

To enable our purpose, vision and mission, Simtra is committed to being the premier customized aseptic fill-finish contract development manufacturer focused on high value and complex parenteral branded drugs for the biopharma industry. To be the best, excellence must guide our every action. This aspiration shapes Simtra's purpose, vision, and mission, influencing how the organization engages with our customers, colleagues, and communities. Through this commitment to excellence, sterile injectable drugs are delivered that improve the lives of patients around the world.

Our Code establishes the overarching principles that guide our corporate behavior, and it sets forth the general policies and procedures that apply to each one of us as representatives of the Company. Our Code is not intended to replace or conflict with any other Company policy or Standard Operating Procedure (SOP), but our Code governs to the extent a conflict exists. Where there is a difference between our Code and the terms of an applicable law or regulation, we are expected to adhere to the most stringent requirement consistent with our Code.

Our Code Applies to All of Us

Our Code applies to all Simtra subsidiaries and affiliated companies. It establishes the framework for interacting with colleagues, customers, suppliers, competitors, government agencies, and the public, and ensures fulfillment of all legal, professional, and ethical obligations.

What's Expected of Us

All employees must comply with the Code and with all Company policies. Failure to do so may result in disciplinary action, including possible termination. In addition, any employee, supervisor, manager, officer, or director who is aware of a violation and does not promptly report and address it may be subject to similar consequences. When appropriate, the Company may pursue legal action or refer matters to public law enforcement authorities for possible prosecution. To demonstrate commitment to the Code, Simtra requires all employees to certify their acceptance and agreement to adhere to the Code upon hire and annually thereafter.

VALUES SPOTLIGHT: MAKE IT HAPPEN

Expectations of Employees

- Read, understand, and abide by the requirements in our Code.
- Embrace our Company's commitment to ethics and integrity.
- Promptly report any potential violations.
- Contact a manager, Human Resources, a Compliance Officer (compliance@simtra.com), or our Chief Compliance Officer with any questions.

Important Role of Managers

Managers, supervisors, and leaders are responsible for modeling the standards in this Code and fostering an environment where compliance is expected, ethical behavior is routine, and employees can raise questions or concerns without fear of retaliation. Individuals in leadership positions play a critical role in shaping team culture and reinforcing the importance of “doing the right thing.” They also are expected to understand the Code well enough to communicate its expectations and address routine questions. All managers, supervisors, and leaders must immediately notify a Compliance Officer (compliance@simtra.com) of any reported concern or potential violation of the Code, even when the matter does not involve illegal conduct.

Training & Education

Continuing education and training support the Company’s success and compliance with the complex laws, rules, regulations, and guidelines that govern its operations. Employees must complete ongoing training to ensure compliance with the Code, Company policies, and applicable legal requirements in the countries where the Company conducts business. Failure to certify or complete required training in a timely manner may result in disciplinary action.

Common Sense

Our Code provides guidance for performing daily job duties, but it cannot address every challenging situation that may arise in the workplace. When in doubt as to whether an activity is proper, you should seek guidance from your Manager, Human Resources, a Compliance Officer (compliance@simtra.com), or our Chief Compliance Officer.

BEFORE ACTING, ASK THESE QUESTIONS:

- Does this reflect Simtra’s commitment to integrity and high ethical standards?
- Could this action harm our customers, colleagues, suppliers, or the Company?
- Would it be uncomfortable if this appeared on the front page of the newspaper?

If the answer to these questions supports transparency, fairness, and integrity, the action is likely on the right track.

STOP AND SEEK GUIDANCE IF:

- The questions cause hesitation.
- Someone can be harmed or unfairly advantaged.
- The action feels wrong.

Guidance is available from your Manager, Human Resources, a Compliance Officer (compliance@simtra.com), or our Chief Compliance Officer.

Open Lines of Communication & Raising Concerns

Maintaining an environment of accountability, clarity, and open communication is a shared responsibility. Simtra supports an open-door policy that encourages employees to seek guidance, request clarification, and raise potential concerns. All employees are expected to speak up if they see or suspect a violation of the law or the Code. Concerns or suspected violations must be reported to your Manager, Human Resources, a Compliance Officer (compliance@simtra.com), our Chief Compliance Officer, or anonymously through the Company's Integrity Hotline.

Simtra takes all allegations of misconduct seriously. When sufficient information is provided, the Company will investigate any reported violation of the Code, Company policy, or applicable law. Investigations arising from alleged compliance violations are reviewed by the Chief Compliance Officer together with executive management to determine appropriate actions. Responses may include remedial measures—such as training, enhanced controls, coaching, or communication—or disciplinary action. Disciplinary actions related to compliance matters are reviewed and recommended by the Chief Compliance Officer.

The Legal, Risk and Integrity (LRI) function is responsible for administering this Code.

No Retaliation

Simtra strictly prohibits retaliation against anyone who, in good faith, seeks advice, raises a concern, or reports potential violations of our Code or any Company policy, law, rule, or regulation. It is a violation of our Code to discipline, discriminate, take adverse employment action, or retaliate against anyone who reports a concern in good faith, regardless of whether such information is ultimately proven correct. Our commitment against retaliation extends to anyone who cooperates in any investigation or inquiry regarding such a concern.





OUR COMMITMENTS TO CUSTOMERS

Excellence in Quality

In order to protect Simtra's reputation, the organization strives to meet or exceed customer manufacturing requirements as well as the rules and regulations governing the industry. All quality processes and safety requirements set forth in the Quality Management System (QMS) must be followed, and all applicable standards and regulations for the development of products and services must be met.

To uphold the highest standards of quality, each individual is expected to lead with accountability, sound judgment, and a strong commitment to compliance, safety, and integrity. This includes remaining vigilant in recognizing potential product complaints or adverse events, gathering the information needed for accurate reporting, and promptly bringing any concern to the Quality team. By acting with care and urgency, individuals reinforce core leadership competencies and strengthen the culture of quality that patients and customers depend on..

VALUES SPOTLIGHT: MAKE IT RIGHT

Quality is the responsibility of every employee. Simtra is dedicated to producing the highest quality injectable drug products, adhering to all legal and regulatory requirements, while making quality a competitive advantage for growth.

Data Security

As a business, Simtra has been entrusted with confidential customer information and sensitive employee personal information. It is our responsibility to maintain the highest standards of confidentiality and data privacy in compliance with all applicable global laws and regulations. Access, use, or disclosure of such information is permitted only when there is a legitimate business need and when it is allowed under Company policies, approved access controls, and applicable privacy and security regulations. Confidential information may not be disclosed to any individual, including other Simtra employees, except where there is proper authorization and a legitimate, compliant need to know basis. Employees are responsible for safeguarding data and upholding privacy requirements at all times.

Protecting Assets

Employees share a responsibility to safeguard Company assets and materials—as well as our customers’ assets—against loss, damage, carelessness, waste, misuse, and theft. Assets include tangible property—such as equipment, vehicles, funds, computers, and electronic systems—and intangible property, including proprietary information and intellectual property. Company assets should be used only for legitimate business purposes, and waste, loss, or damage should be reported promptly.

No Use of “Inside” Information

Although Simtra is not a publicly traded company, employees may learn “inside” information about the biopharmaceutical companies with which the organization works. In many instances, that information may not be known to the public and it might be information that a reasonable investor may consider important when deciding whether to buy or sell our customer’s stock or securities. Employees must keep this information confidential and should not buy or sell any publicly traded securities if employees are in possession of insider information. Likewise, employees should not share or disclose such information to anyone else—including friends and family members—because both the person who provides the material information and the person who acts on it could be considered to have violated the law.

CONFIDENTIALLY REMINDER:

Information received from our customers, as well as other forms of sensitive personal or business information, may be subject to confidentiality and nondisclosure restrictions. Confidential information may not be disclosed to any individual, including other Simtra employees, unless properly authorized and required for a legitimate, compliant business purpose. Employees are responsible for safeguarding such information and upholding privacy requirements at all times.

Fair Competition

It is important to compete fairly in the marketplace and to ensure that all business activities comply with applicable antitrust and competition laws. Employees should not make agreements or engage in concerted actions with a competitor that could be construed as price-fixing or collusion. Similarly, employees should avoid inappropriately discussing sensitive, potentially anti-competitive topics with third parties including prices or pricing, output capacities, sales, bids, profits, profit margins, or costs.

Cybersecurity Measures

Employees must take all necessary steps to ensure the safety and integrity of our information, technology systems, and networks. This includes the responsibility to use computer, data, and telecommunication resources in a safe, ethical, lawful, efficient, and productive manner. Unauthorized, inappropriate, or unlawful use of the Company’s telecommunication resources or equipment may result in disciplinary and legal action. Where allowed by law, the Company may monitor and access the use of Company assets, and employees in the United States should not have an expectation of privacy with respect to the use of Company information systems and networks, including computers and mobile phones.



Truthful Advertising & Marketing

It is important that employees accurately represent our products and services. Employees must not engage in unfair or deceptive practices, such as false or misleading advertising, untrue or misleading claims, testimonials, or comparison claims.

Protecting Intellectual Property

Protecting our intellectual property is critically important, and employees must all take efforts to ensure that it is not misused or misappropriated. Employees must not allow our intellectual property—or the intellectual property of our customers—to be used or shared with people outside of our Company without appropriate non-disclosure or other legal documents in place. Likewise, employees must not infringe on the intellectual property rights of any other companies or allow the intellectual property of our customers or other third parties to be misused or misappropriated.

PROTECTING OUR ASSETS

Employees are responsible for signing a proprietary information and inventions assignment agreement as part of safeguarding confidential information and ensuring that any intellectual property created in the course of their work belongs to the company.

Third Party Management

Our suppliers and vendors are an extension of Simtra, and in some cases their conduct may be legally attributed to the Company. Reasonable due diligence must be performed to ensure that any third party engaged by Simtra meets the Company's expectations for legal and ethical compliance. This includes adherence to laws governing anti-boycott practices, economic sanctions, trade embargoes, import and export controls, antiterrorism and anti-money laundering requirements, and regulations related to conflict minerals. To support these obligations, third parties are provided with Simtra's Supplier Code of Conduct and are required to agree to follow it or maintain equivalent standards.

Social Networking

Employees should exercise caution when using social media and act in accordance with Company policies and our Code. This means that employees must never disclose confidential information, including posting names or logos of our customers, making statements that could identify our customers or their products, or merely stating that Simtra renders services to such customers. It is important not to attribute personal opinions to the Company or give the impression of speaking on behalf of the Company unless authorized. Any violation of these requirements can result in disciplinary action, up to and including termination.



OUR COMMITMENTS TO BEING A GREAT PLACE TO WORK

Belonging & Equal Opportunities

Simtra is a merit-based, equal opportunity employer. All employment decisions must be based on an individual's skills, qualifications, job performance, and our business needs, without regard to race, color, religion, gender, national origin, age, sexual orientation, gender identity or expression, protected veteran status, disability status, or any other legally protected characteristic. Simtra promotes an inclusive and respectful workplace, and employees are responsible for maintaining a professional environment that upholds dignity, respect, and fairness.

Anti-Harassment

Simtra does not tolerate verbal, physical, or sexual harassment, bullying, or any behavior that creates an intimidating, offensive, or hostile environment. This includes inappropriate comments or jokes of a racist, sexist, ethnic, or otherwise demeaning nature. Harassment is unacceptable in all Simtra work settings and in any interaction involving employees, contractors, or business partners. Each employee is responsible for helping maintain a respectful workplace and speaking up when conduct makes us uncomfortable or violates these standards.

VALUES SPOTLIGHT: MAKE IT TOGETHER

Simtra is committed to collaboration that extends across teams, suppliers, and customers. When every voice is respected and every strength is drawn upon, new possibilities emerge and meaningful solutions are created.

Environmental, Health, and Safety

All employees must conduct themselves and all Company activities in a safe and environmentally responsible manner. Work areas should be proactively inspected to identify and address conditions that may create a risk of personal injury or environmental impact. All workplace injuries, near misses, and environmental concerns must be reported as soon as reasonably possible. Employees are also expected to provide coaching and feedback to help prevent unsafe practices and conditions.



Preventing Violence

Simtra has zero tolerance for workplace violence or threats of violence. Employees must never engage in hostile, abusive, or threatening behavior, even jokingly. To maintain a safe environment, weapons of any kind are prohibited on all Company property, including parking areas and Company vehicles, and may not be carried while on duty. In accordance with Indiana law, employees may keep firearms securely locked and out of sight in their personal vehicles.

Prohibiting Substance Abuse

Employees shall report to work free from the influence of any substance that could impair safe and effective job performance. Given the nature of our business, optimal performance is essential every day to maintain quality, safety, and compliance.

HERE TO HELP WHEN NEEDED

Sometimes personal challenges can impact our work and well-being. When this happens, confidential support is available through our Employee Assistance Program at +1 888.628.4824 or www.guidancerources.com.

Avoiding Conflicts of Interest

At Simtra, employees are expected to act in the Company's best interests and avoid situations where personal interests could interfere with their job responsibilities or appear to do so. Conflicts can arise when personal relationships or activities—such as family ties, friendships, financial interests, or romantic or social relationships—could influence an employee's judgment or actions at work.

Any actual or potential conflicts of interest should be reported to Human Resources or Legal, Risk & Integrity (LRI), and the Company's Compliance Officer will review the circumstances and determine whether any steps are needed to address the conflict of interest.



OUR COMMITMENTS TO THE PUBLIC

Sustainable Practices

At Simtra, sustainability extends beyond environmental responsibility and reflects the Company's commitment to community engagement, quality standards, strong governance, and future ready growth. Sustainable and responsible practices inform business decisions and daily operations. Simtra aims to reduce its environmental footprint and strengthen its positive impact on employees, customers, and the communities in which it operates.

Environmental Protection

As a good corporate citizen, Simtra is committed to responsible environmental stewardship. The Company follows environmentally sound business practices in compliance with applicable environmental laws and regulations. Simtra also seeks opportunities to reduce waste and to use energy, water, and other natural resources more efficiently.

Simtra is committed to:

- Being a good corporate citizen and reducing the environmental impact of our operations.
- Creating a great place for people to work and to live in the communities where the Company operates.
- Acting with integrity and doing the right thing.

Human Rights

Simtra is committed to respecting and promoting the human rights of all individuals. The Company adheres to all applicable laws prohibiting forced labor, child labor, and human trafficking, and does not tolerate any form of human rights abuse within its operations or our supply chain. Employees, partners, and suppliers are expected to uphold these standards and help protect human rights across the value chain.

Volunteerism & Community Involvement

A strong commitment to charitable giving and philanthropic causes is a defining element of Simtra's culture. Employees are encouraged to participate in charitable activities and to volunteer in the communities where they live and work. All corporate charitable activities, contributions, and donations must be made freely and without any expectation or demand of a business return.

Political Activities

Simtra is an “apolitical” company and does not have a practice of making political contributions with respect to any party, candidate, or issue. Employees are free to participate in the political process; however, any personal participation or contribution must not create a perception that a personal activity or donation is on behalf of Simtra.

Media & Public Relations

The Company will provide factual, consistent, and trustworthy information to the media and the public. All media interactions, including interviews, press releases, press events, and media campaigns conducted by employees or contractors on behalf of Simtra, should be directed by the Marketing and Communications department.

Interactions with Government Officials

Simtra must fully cooperate with government and regulatory agencies to ensure compliance with all applicable laws, regulations, audits, and investigations. All interactions and business relationships with government or regulatory entities must be established through legitimate means and conducted with transparency and integrity.





OUR COMMITMENTS TO ETHICS & INTEGRITY

Maintaining Accurate Books & Records

It is imperative that the Company's books and records contain accurate and honest information and reflect the truth of underlying transactions and events. Records are defined as all physical or electronic documents that are created as part of our work. Accurate records are crucial to Simtra's ability to comply with regulatory audits and the law. Employees must never sign, authorize, or submit any Company record that they know or suspect contains false or misleading information.

Preventing Bribery & Corruption

Simtra wins business through integrity, not improper payments. Employees may not offer, promise, authorize, request, or accept any bribe, kickback, or facilitation payment, whether directly or through a third party. This includes anything of value intended to improperly influence a business decision or gain an unfair advantage. "Anything of value" may include cash, gifts, entertainment, hospitality, contributions, rebates, commissions, jobs, or benefits for family members. Employees involved in international work must comply with all applicable anti-bribery and anti-corruption laws, including the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and relevant local laws.

Engagements with Healthcare Providers (HCPs)

Interactions with HCPs must always comply with applicable laws, regulations, and industry codes where Simtra is a member. Any personal or financial exchanges that could create improper influence must be avoided. Healthcare Provider includes any individuals, clinical or non-clinical, public or private, who may directly or indirectly influence the purchase, use, or recommendation of medical technologies. This includes, for example, physicians, nurses, technicians, laboratory scientists, researchers, and procurement personnel.

When providing anything of value to an HCP, employees must follow all required due diligence, pre-approvals, recordkeeping obligations, local limits, and applicable procedures. Many countries impose strict anti-bribery and anti-corruption requirements governing interactions with HCPs, and employees are responsible for understanding and adhering to all relevant country specific rules.

False, fraudulent, or misleading data or information must never be submitted to any government agency or third-party payor in connection with obtaining commercial drug approval or participating in a program.

Business Courtesies

Business courtesies—such as meals, gifts, travel, and hospitality—must be reasonable and appropriate to avoid any appearance of improper influence. Courtesies may support productive business relationships, but they must never create the impression of seeking an unfair advantage or compromising ethical judgment.

Before offering a meal, gift, or entertainment, employees must confirm that the courtesy complies with Company policy and the recipient's own rules. Although certain regions may have customs involving gift-giving, gifts must never be provided to government officials, public officials, or HCPs.

Responding to Legal & Regulatory Inquiries

Internal or external parties may request information or records in connection with audits, investigations, or legal proceedings. To ensure the Company responds appropriately, any request from a regulatory or governmental agency for records, information, or an audit must be reported immediately to the Chief Quality and Regulatory Officer. Likewise, all legal matters, including subpoenas and similar documents, must be promptly referred to our General Counsel immediately.

International Trade Compliance

Simtra is committed to complying with all applicable international trade sanctions and embargoes. This includes prohibitions on conducting business with certain governments, individuals, and entities. Sanctions and embargoes must be closely monitored, and strict compliance is required with laws governing imports, exports, diversion, denied party lists, and anti-boycott regulations.

Document Management

Company records must be maintained, managed, and ultimately destroyed in accordance with internal document retention policies. Retention requirements may vary by record type, the underlying information it contains, or applicable legal and regulatory obligations. In some instances, requests from government agencies, regulatory bodies, or litigation may require records to be preserved beyond normal retention periods. Employees are responsible for understanding, staying current with, and following Company requirements regarding record preservation.





OUR COMMITMENT TO OPEN LINES OF COMMUNICATION & RAISING CONCERNS

All employees are encouraged to report activities that are not consistent with our Code, policies or any law or regulation to:

- Your manager
- Human Resources
- Our Chief Compliance Officer at:
 - Via email at **compliance@simtra.com**
 - Via direct email at: **mtloffredo@simtra.com**
- Simtra's Integrity Hotline, which allows employees to report concerns anonymously:
 - In the United States: +1 833.221.2651
 - In Germany: 0800 1824463
 - From outside of Germany: +49 0800 1824463
 - Via the web: **<http://www.simtra.ethicspoint.com>**





Simtra
BioPharma Solutions