



01.12.2024

Code of Ethics

Welcome to the Curium Code of Ethics

Building on a legacy that goes back more than 30 years, everyone at Curium is united by one purpose: redefining the experience of cancer through our trusted legacy in nuclear medicine.

It is this purpose that inspires our individual and collective actions as we explore radiopharmaceutical innovations and deliver life-changing solutions to serve more than 14 million patients every year.

And while our purposes direct our focus, our behavior every day must be grounded in our values of integrity, commitment and collaboration, which are demonstrated by:

- Honest, transparent, and reliable decisions and actions.
- The highest standards of excellence and ethics.
- Commitment to following all applicable laws, regulations, and rules.

These values define our standards of behavior and everyone at Curium must embody them.

In support of our purpose and values, Curium's Code of Ethics is intended to help each of us navigate the complex world of a highly-regulated industry to ensure that we uphold the highest standards of behavior every day.

On behalf of Curium's Board of Directors and operating committee, thank you for your dedication to our patients and for your commitment to our values and Code of Ethics.

- Renaud



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READ MORE

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- [Anti-Fraud and Anti-Corruption Policy](#)
- [Trade Compliance and Sanctions Policy](#)
- [Environmental policy](#)
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Why do we have a Code of Ethics?

At Curium, we are committed to improving the lives of all the patients that we serve and behaving ethically is instrumental to being who we are.

This is why it's essential that each of us at Curium and everyone who represents Curium in any way is personally committed to respecting and following our Code of Ethics. It's up to each of us, no matter our position or role, to maintain a culture of integrity and make compliance with the Code, laws, and regulations a constant priority.

Unethical or dishonest behavior does not fit with our company values and cannot be tolerated. By behaving ethically, not only we stand for our values and principles, but we also build trust with our business partners and customers, thus building our future success for ourselves, Curium, and, most importantly, the patients we serve.

Who does our Code apply to?

This Code applies to everyone working for and on behalf of Curium: **Employees**, consultants, officers, directors, distributors, and agents (referred to as a *Curium Teammate* in our Code). Because the values embodied in this Code are so important, we expect all of our business partners and suppliers to uphold the spirit and standards of the Code and, when necessary, to formally adhere to them themselves.

Definition

Employees include any person working directly for Curium as an employee or contracted staff.



So how do we do this, in practice?

... It's simple:

- 1 Read our Code.
- 2 Familiarize yourself with its content, engage with your colleagues, your manager, your HR business partner or a member of the legal department to ensure you understand the content of the Code.
- 3 Complete the short Self Check exercises included at the end of each section, and do not hesitate to reach out to your manager, HR business partner, or the legal department for further guidance.
- 4 Take what you learn and put it into practice every day.

This code contains the key principles, which are further explained in the additional policies that every employee should read and understand as well.

Thank you for all you do for Curium, your fellow teammates, our customers, and the patients we serve.



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What is expected of me?

As a Curium Teammate, we expect that you:

- ✓ **read and understand our Code** and support Curium compliance policies,
- ✓ **ask for help or further training** when you have questions or doubts about the content of our Code,
- ✓ **comply with our Code** in your day-to-day work,
- ✓ **call out fellow employees or third-party stakeholders when they do not follow our Code,**
- ✓ **speak up** if you become aware that a Teammate, supplier, or business partner is not complying with our Code,
- ✓ **cooperate fully and transparently** with any investigation involving potential compliance violations, and
- ✓ **take part in compliance training exercises** organized from time to time by the Curium Legal department.

How do I make a report if I believe our Code has been violated?

Reporting your concerns about Code compliance upholds the values embodied in our Code while protecting Curium's business and reputation.

We invite any employee, business partner or stakeholder to report any fact or behavior related to Curium's activities that you have a **good faith reason to believe violates our Code or the law.**



Take note

Good faith means based on common sense, honesty, and genuineness. You have a good faith reason if you genuinely and honestly believe, based on common sense, someone has violated the Code.

If you have concerns that the Code is not being properly followed, it is generally best to share these concerns with your manager, who will then make a report to the [Compliance Office](#). But if this is not an option or you don't believe it's appropriate based on the nature of the issue, you can also report your concerns at any time to a senior manager, HR, or directly to the Compliance Office by using the dedicated [Reporting Line](#).



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How am I protected from retaliation?

As found in [Curium's Whistleblower Policy](#), anyone who reports an actual or suspected violation of the Code or the law in good faith should have no fear of **retaliation**.

Take note

Retaliation is where someone acts negatively toward you in response to your actions, for example if you are fired after reporting a coworker for stealing office supplies.

Curium has a zero-tolerance policy regarding any retaliation against individuals who report concerns in good faith.



Who monitors and enforces our Code?

The Curium [Compliance Office](#) is in charge of monitoring compliance with the Code. It is made up of both Curium's Chief Legal Officer and Deputy Chief Legal Officer.

The Compliance Office operates with full autonomy, is not under the control of any other Curium office or department, and directly reports to Curium's Board of Directors and operating committee. Thus, the Compliance Office:

- has the power to give independent advice throughout the decision-making process.
- works without outside influence or possible conflicts of interests with other Curium departments.
- is protected and cannot be blamed if management does not follow a Compliance Office standard or judgment and decides not to act or investigate.

The Compliance Office operates with the strictest standards of confidentiality. When investigating a potential violation of the Code, the Compliance Office will thoroughly review the facts, evaluate potential compliance issues and take the appropriate steps, including, when necessary, seeking external help.

How do I contact the Compliance Office?



Contact the Compliance Office by sending an email to Compliance.Office@curiumpharma.com and each member of the Compliance Office will receive your message. You can also contact the members of the Compliance Office directly if you prefer. Alternatively, you can also report your concerns using Curium's [Reporting Line](#).



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What should I do if...?

Can I report a situation even if I'm not sure it's a breach?

As long as you're reporting in good faith (you're genuinely concerned about a possible breach), yes you can make a report even if you're not certain of a breach.

...

Can I contact the Compliance Office if I just have a question or doubt, not to report anything?

Sure! And you should do this as soon as you have any question or doubt — That's what the [Compliance Office](#) is for.



How to use our Code?

We have structured our Code in a way that is simple to navigate. It is divided in three chapters, each with practical examples, Q&A, and Self Checks for you to easily understand how the Code applies to your day-to-day activities at Curium.





CHAPTER 1

Ethics in the workplace

a) Our commitment: a respectful, safe, and inclusive workplace

At Curium, our people are our most valuable resource. We want all our Teammates to feel at ease, knowing they can work in a safe and fair working environment that ensures respect, dignity, and common courtesy in all professional interactions.

This means that we guarantee internationally recognized human rights, we stay away from any form of human trafficking, and we ensure the absence of discrimination. Furthermore, we do not tolerate any form of bullying, any form of **harassment, sexual harassment**, or any other offensive or disrespectful behavior.

This also means that we celebrate diversity. We strive to be an inclusive organization, where a diverse workforce and respectful work environment are essential parts of a thriving, innovative, and sustainable business. All Employees are entitled to equal opportunity and fair treatment in employment decisions. Curium also embraces fair employment practices, respects the freedom of association, and ensures a safe working environment at all sites, preventing workplace accidents and injuries.

In short, our workplace is built on honesty, integrity, and respect for each other.

b) How does this work in practice?



Consider a situation where a team member is celebrating Holi, a sacred ancient Hindu tradition also known as the festival of colors. This co-worker shares his joy ahead of the festival with his team, and explains that he will be away from work for two days to participate in the festival. His manager, who is frustrated about his upcoming absence, decides to replace him on a very important product development project.

This decision is likely to be considered disproportionate and to constitute a discrimination based on religious beliefs. At Curium, we prohibit discrimination based on any of the following characteristics, even if not prohibited by applicable law:

- Age
- Culture and language
- Disability
- Ethnicity
- Gender or gender identity
- Marital or family status
- National origin
- Race or color
- Religious beliefs
- Sex or sexual orientation

If you're not sure what to do in these situations, it's simple:

1. Ask yourself whether you would want someone you love being subjected to the behavior at issue.

2. If still in doubt, please contact:
compliance.office@curiumpharma.com



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b) How does this
work in practice?

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What are the other practical implications of our commitment to a safe, fair, and sustainable working environment?

- If you are the victim of any form of **harassment**, you should tell the harasser that their conduct is offensive and they must stop immediately. If you're not comfortable confronting the harasser directly, report them to a senior manager, HR, or the Compliance Office.
- All of our Employees have the same internal advancement opportunities that are based on requirements that may include qualification and merit, and consider the role's requirements such as education, prior experience, skills, performance, values, leadership, and other relevant criteria.
- We also make sure similarly employed Teammates with the same experience and qualifications receive equal pay for equal work.
- All our Teammates are free to choose to be a member of any employee organization. When Employees are represented by a legally recognized trade union, we will establish a constructive dialogue and negotiate or consult with their representatives when necessary.
- Our work and our suppliers must never involve child labor.
- If a Teammate is found in breach of any of these principles, we can apply disciplinary measures up to termination of employment or contract.



Definitions

Harassment includes discriminatory, abusive, or offensive behavior directed at a person because of their race, religion, gender, sexual orientation, veteran status, or any other characteristic, whether or not the characteristic is specifically protected by applicable law or regulation. Any such behavior is considered harassment by Curium whether it's verbal, visual, or physical.

Sexual harassment is a type of harassment that involves unwelcome sexual advances, requests for sexual favors, or any other behavior or conduct of a sexual nature.

If you witness unwanted sexual advances in the workplace, whether it's verbal, visual, written or physical, that creates an intimidating, hostile or offensive work environment, you must report it without delay to compliance.office@curiumpharma.com.



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c) What should I do if...?

My colleague is recruiting a new team member and my female friend applied unsuccessfully. I am concerned she could be discriminated against because she is pregnant. What should I do?

You are right to raise your concern – we will not tolerate any form of discrimination. Firstly, you should encourage your colleague to discuss the selection criteria with the HR manager. If there is no change, then you should raise the issue with your manager, another senior manager, or the Compliance Office.



What should I do if I suspect a colleague is operating equipment under the influence of alcohol or drugs?

You should confront your colleague and if your suspicion is confirmed, you should tell your colleague that this is not appropriate.

You should also report the incident to your line manager or to your HR Business partner.



Self Check

Take just 2 minutes to check your understanding of Chapter 1

1

TRUE OR FALSE?

Our Code only applies to me when I'm at work or with people from work.

2

CHOOSE THE RIGHT ANSWER

If I believe someone has violated the code and I make a report:

- a. my report will automatically be anonymous
- b. it must be made to my direct manager no matter what
- c. I will be protected against retaliation in response to my report

[Click here to see the answers](#)



CHAPTER 2

Conducting business fairly and ethically

1. COMPLYING WITH COMPETITION RULES

a) Our commitment: make our business decisions independently and compete fairly

Competition laws (also called antitrust laws) have been developed to ensure that consumers receive a fair share of the benefits generated by the market economy.

Fair competition brings important benefits to consumers: innovative products and services, lower prices, improved choices, and efficient allocation of resources, products, and services.

That's why we commit to operate independently in markets and win business fairly. In addition, because we work in a unique industry with constraints that sometimes require we cooperate with our competitors, we have to be particularly careful when doing so and be mindful of the competition law compliance risks.

Specifically, this means that we:

- make our business decisions independently, especially regarding strategy, pricing, markets we address and customers we deliver.
- do not agree with any competitor to divide or assign customers, markets, or bids.
- do not share any commercially sensitive information with any competitor, such as information related to strategy, pricing, or customers.

b) How does this work in practice?

✓ Keep contact with competitors to a minimum.

Meeting and interacting with competitors is not illegal in itself, but even legitimate cooperation with competitors can bring competition risks. A simple appearance of collusion or a secret agreement can cost Curium greatly. In some countries, there may also be the risk of fines, imprisonment or other sanctions for individuals.

Everyone involved must be very careful with the content being exchanged during legitimate interactions with competitors. If a competitor interaction takes place, for example because the competitor is also a customer or supplier, or because the competitor is participating in a trade show or a trade association meeting, limit your exchanges to only what is absolutely necessary and make sure you comply strictly with Curium's [Competition Law Compliance Policy](#).

If in doubt, always consult with the [Compliance Office](#) before acting.



1. COMPLYING WITH COMPETITION RULES (CONTINUED)

✓ Do not coordinate bids or responses to Requests for Quotations (RFQs) with competitors.

This is known as bid rigging, which is always illegal. We must independently respond to customer bids and RFQs.

What if we need to submit a joint offer with a competitor to respond to a tender?

- Always check with the Compliance Office beforehand. It might be possible under certain circumstances, but only with the Compliance Office's approval.

What if a competitor asks you to submit a joint offer?

- Simply say that you cannot discuss this on your own, and immediately inform Curium's legal department.

✓ Be aware of Curium's position in the markets in which it operates.

As a leading company in the field of Nuclear Medicine, Curium is an important player in its industry. While being a leading company is certainly not illegal and is something that we can and should be all very proud of, this also comes with additional responsibilities.

Therefore, when defining our commercial strategy, when negotiating commercial contracts or contemplating acquisitions, we should always take the time to assess the impact that our position in the market may have on our plans and how to best manage the potential risks or hurdles that may come in the way, so that we can continue to compete fiercely, but fairly.

c) What should I do if...

I am meeting a competitor at a conference next week. Am I allowed to talk with them about a deal I know on which we're both bidding?

No. Any exchange of information that might change the normal competitive market conditions or coordinate competitor activities can violate competition law. You must not discuss the tender with your competitor.

...

Can Curium and a competitor enter into a joint production agreement for generators?

Maybe, but it depends on the facts of the specific situation and would need to be closely reviewed by Curium's legal department beforehand.

...

Can I call a competitor to see how they plan to respond to a specific RFQ?

No, this could be considered coordinating with the competitor and is strictly forbidden. This would only be allowed if it was during the course of an approved joint offer after the Compliance Office had reviewed the situation and given the go-ahead.



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1. COMPLYING WITH COMPETITION RULES (CONTINUED)

Can Curium attend trade association meetings where competitors discuss future SPECT prices or other competitively sensitive topics?

No. Even passive participation without clearly distancing yourself from what is being discussed can put Curium at risk of an antitrust violation. This includes attending or staying in a meeting where you know inappropriate topics will be discussed, even if you are not actively involved in the discussion.

Can Curium enter into exclusive supply agreements with its customers or suppliers?

The answer to this question depends on the actual market share of the parties involved in the agreement. Before entering into any exclusive dealing arrangement with any supplier or customer, please check with Curium Legal department if such exclusivity could trigger competition law compliance risks.



READ MORE

For more details about these competition compliance requirements, and specific rules regarding tying, bundling, discounts & rebates, exclusivity provisions, refusal to supply and participation in trade associations, please refer to [Curium's Competition Law Compliance Policy](#) and do not hesitate to reach out to [Curium's Legal department](#).



Self Check

Take just 2 minutes to check your understanding of Chapter 2, Section 1

1

FILL IN THE BLANK

Coordinating bids or RFQs with competitors is known as _____, which is illegal.

2

MULTIPLE CHOICE

The benefits of fair competition include:

- a. Lower prices for consumers
- b. More choices for consumers
- c. Better access to resources, products, and services
- d. Avoiding legal problems
- e. All of the above

[Click here to see the answers](#)



2. AVOIDING BRIBERY AND CORRUPTION

a) Our commitment: zero tolerance for corruption and bribery



Most of you probably think "Corruption? That's none of my concern, I'm not a gangster!".

Of course not; However some common business situations might lead to corruption: gifts, entertainment, travel, meals, lodging, employment...

At Curium we are committed to never engaging in any form of **corruption or **bribery** and to always engage fairly with business partners and public officials.**



Definitions

Corruption: promising, giving or accepting money or anything of value to persuade someone to do something, often in breach of their duties. The key to understanding corruption is the *quid pro quo*, meaning whether the money or 'thing of value' is given or accepted in exchange for something else, usually a breach of rules or processes.

Bribery: form of corruption related especially to public officials, for example to obtain a market authorization or speed up customs clearance.

b) How does this work in practice?



We ensure full transparency and honesty regarding our relationships with healthcare professionals and regulators.

In our industry, we interact with people who can influence hospitals or patients decisions about our products and services. We must ensure that all these interactions are guided by the highest standards of integrity.

In practice, this means:

- We can only engage a healthcare professional's services when there is a legitimate business need and value for Curium;
- Curium can never pay more than what is considered an appropriate market rate for a healthcare professional's services;
- Providing something of value to a healthcare professional or regulator in return for a favorable decision or other business advantage is strictly prohibited.



What if I would like to thank a healthcare professional with a festive season gift?

- Offering or providing anything of value to a healthcare professional must be done openly, properly documented **here**, and after informing our **Compliance Office**, who will let you know whether any other requirements apply.



2. AVOIDING BRIBERY AND CORRUPTION (CONTINUED)

✓ We ensure zero tolerance for bribery.

We do not pay bribes or any facilitation payment to anyone, regardless of the amount, even if it means losing business opportunities. In practice, bribes can take many forms, like cash, gifts, debt forgiveness, loans, personal favors, entertainment, meals, travel, political and charitable contributions, business opportunities, medical care, and any other similar items or offers. Using a middle man or intermediary does not change anything.



You might wonder, "What if I'm asked for a bribe, or witness bribery?"

→ Just say no and immediately inform our [Compliance Office](#).

✓ We protect those who report in good faith.

If you think there is a corruption or bribery situation, you must report it immediately to our Compliance Office. You can report anonymously, unless local procedures require otherwise.



Good to know

Curium rules protect anyone who makes a good faith report. Nobody can take adverse or negative employment-related action against any Curium Employee for reporting a violation or suspected violation of anti-corruption laws or this Chapter in good faith.

c) What should I do if...

We are hosting an international conference and would like to hire a doctor to make a speech. Is that okay?

Yes, as long as there is a genuine need for the speech and the compensation matches fair market value. There should be no real or perceived connection to the purchase of Curium products, and the doctor remains free to determine the content of its speech. You must properly document the services and, if necessary, disclose the relevant information to the doctor's institution and the government based on the applicable laws and procedures. Contact the [Compliance Office](#) for more information and guidance.



I suspect that a sales agent acting for Curium has been making improper payments to an end customer, but I don't think anyone at Curium was involved. Should I report this?

Absolutely. Curium, including our Employees, directors, and officers, can be held legally responsible for third-party actions, even if we were not directly involved. Report this to the Compliance Office immediately.





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2. AVOIDING BRIBERY AND CORRUPTION (CONTINUED)

...

A Curium distributor has asked for an additional product discount, which is above and beyond our regular discount, because of unexpected government fees. Should this be reviewed before offering the discount?

Yes, we must clearly understand what additional fees the distributor is being asked to pay. Reviewing situations like this is good business practice and helps ensure these are valid charges that cannot be viewed as a bribe.



READ MORE

Read more in our detailed [Anti-Fraud and Anti-Corruption Policy](#).

Self Check

Take just 2 minutes to check your understanding of Chapter 2, Section 2

1

CHOOSE THE RIGHT ANSWER

What can change a gift or business expense from being okay to being corrupt?

- a. When I pay with my personal credit card
- b. When I get something in return
- c. When it involves quid pro quo
- d. When it involves someone from another country

2

FILL IN THE BLANK

Curium's relationships with _____ require extra care when it comes to being transparent and honest.

[Click here to see the answers](#)



3. MANAGING POTENTIAL CONFLICTS OF INTEREST

a) Our commitment: avoid conflicts of interests

Many situations can create a potential conflict of interest, and not all are obvious.

Here are some examples:

- Accepting personal gifts or entertainment from competitors, customers, or suppliers.
- Working for or holding shares in the capital of any competitor or other business partners, suppliers, customers, distributors, or agents.
- Working in competition with Curium while you also hold a position at Curium.
- Using your position at Curium for inappropriate personal benefit.
- Employing close relatives, especially when those relatives report directly or indirectly to the Curium Employee they are related to.
- Using a supplier where a friend or relative has a role or a financial interest.

To make sure that we take the right business decisions in the best interests of Curium, our stakeholders and the patients that we serve, we must avoid conflicts of interests and be open about it when there is potentially one. Do reach out to Curium's [Compliance Office](#) if you believe you are facing a potential conflict of interest so that you can be supported in making the right decision.

Small gifts are allowed, as long as they're not offered to influence decisions that affect Curium.

Gifts of less than €200 or \$250 are unlikely to raise concerns, provided (i) that they are not offered in cash or cash-equivalent, (ii) that they are recorded with complete transparency in our records, (iii) that they are offered out of respect, appreciation, courtesy, or in return for hospitality and following local customs and (iv) that they are not made with an implied or explicit expectation of reciprocal consideration.

This applies both to giving and receiving gifts.

If you are unsure as to whether the proposed gift meets the above criteria, please reach out to Curium's [Compliance Office](#).

Good to know



Your local Curium Leadership Team might have established stricter rules. Read more about specific rules on gifts, expenses, records and internal controls in our [Anti-Fraud and Anti-Corruption Policy](#), and check your local limits.

Employment Offers: We must not offer internships or employment to healthcare professionals, government officials, or any Curium business partners (or any of their relatives) with the purpose of influencing their decisions.

Good to know



You must inform our Compliance Office if you happen to interview any of these people in the ordinary course of business.



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3. MANAGING POTENTIAL CONFLICTS OF INTEREST (CONTINUED)

b) What should I do if...?

I've become good friends with one of my suppliers after working together for so long. Are there any guidelines to help me avoid potential conflicts of interest while working together?

To figure out if the supplier relationship could expose you to a conflict of interest, or even the appearance of a conflict, ask yourself:

- Is it a friendly professional relationship, or has it become a personal friendship?
- Are you concerned that your personal loyalty to the supplier could interfere with your ability to objectively evaluate the supplier and make decisions in Curium's best interest?

If your answers suggest a possible conflict or you have any doubt, talk to your manager and/or reach out to Curium's Compliance Office.



What should I do if I receive a personal gift from a supplier in a country where refusing business gifts can be seen as an insult?

If rejecting the gift would be culturally impolite and could damage the supplier relationship, accept the gift on Curium's behalf and turn it over to your manager to be properly handled by Curium. If you're not sure what to do, ask the [Compliance Office](#) for guidance.



I provide meals, gifts, travel, and entertainment to customers from time to time. Is this appropriate?

Providing business courtesies can be an appropriate way of doing business, but only in the right circumstances. A variety of laws apply to business courtesies, which are complex, differ from country to country, and can have serious consequences for Curium. Before offering or providing a business courtesy, make sure it satisfies Curium's anti-corruption rules, guidelines, and requirements. And if you still have any question or doubt, contact the Compliance Office.



READ MORE

Read more in our detailed [Anti-Fraud and Anti-Corruption Policy](#).



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3. MANAGING POTENTIAL CONFLICTS OF INTEREST (CONTINUED)

Self Check

Take just 2 minutes to check your understanding of Chapter 2, Section 3

1

TRUE OR FALSE?

A gift is okay if it's worth \$100 and in cash because it doesn't have to be recorded.

2

CHOOSE THE RIGHT ANSWER

To which of these people can I offer a job?

- a. My partner's doctor, who might endorse a Curium product
- b. The son of my country's elected representative, who could help make a law more beneficial for Curium
- c. A recent graduate with a biochemistry degree who just learned about Curium and meets the hiring criteria
- d. A sales director at a company Curium buys products from who could get us a discount

[Click here to see the answers](#)



4. NAVIGATING THROUGH INTERNATIONAL TRADE, CUSTOMS AND SANCTIONS COMPLIANCE

a) Our commitment: comply with trade, export and sanctions regulations

As a company that operates globally, Curium's business relies on moving people, products, technology, and information all around the world every day.

These activities are regulated by international trade laws with different restrictions depending on factors such as the place of origin, content, destination, end use, and alternative uses of our products and services, as well as who is involved.

Because of this, there are strict legal requirements that must be followed when representing Curium and carrying out business on our behalf. This applies to all Curium products, technology, services, Employees, and other business and trade activities.

For example, we can be prohibited from doing business in certain countries or with certain individuals, or from exporting certain products to certain countries without an appropriate license obtained beforehand. Regulatory controls might apply where we export our radiological products to or where we operate our facilities.

Certain production equipment, computers, chemicals, and other non-production goods may also be subject to restrictions because of their 'dual-use' nature, even if they are used to make pharmaceutical products.

For example, Curium might use laboratory equipment to develop new medicines, but someone else might use the same equipment to develop a biological weapon.

Because of this, it is important to remember that applicable law and Curium procedures must be strictly followed when exporting any items, technology, or software, and, in the United States, when releasing technology to a non-US national. Reach out to the Compliance Office any time you have a question or doubt about exporting and transferring anything at Curium.

Finally, we must ensure that when we are trading goods internationally, we apply the correct customs classification. Using the wrong classification can have costly implications for Curium and/or its customers and can disturb significantly our supply chain.

b) How does this work in practice?

Every Curium Teammate must follow all applicable laws and regulations regarding **economic sanctions, embargoes**, and other restrictions on transactions with certain countries, groups, and individuals. These rules and sanctions apply to business activity and trade related to goods and services, investments, financing trade transactions, and supplying technology associated with goods and services.



READ MORE

Please check the list of countries under embargo, which changes over time, in the **Trade Compliance and Sanctions Policy**. US citizens working at Curium should also be aware that there are some specific requirements for US employees, which may be broader than those applicable to non-US employees.



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1. Comply with competition rules
2. Avoid situations of bribery and corruption
3. Manage potential conflicts of interests
4. **Navigate trade and sanction compliance**

CHAPTER 3

4. NAVIGATING THROUGH INTERNATIONAL TRADE, CUSTOMS AND SANCTIONS COMPLIANCE (CONTINUED)



Definitions

Economic sanctions: a prohibition applied by a government or similar institution against engaging in certain economic activities with an entity or individual in an attempt to force them to change their behavior. For example, a country's government could prevent a business from accessing its financial assets in that country until they stop violating a law.

Embargoes: an official order that restricts or bans trade and other business activities within a specific country, usually for political or economic reasons. An embargo is a type of economic sanction and typically involves blocking business activities with a specific country because the country is, for example, violating human rights or threatening national security.

Self Check

Take just 2 minutes to check your understanding of Chapter 2, Section 4

1

TRUE OR FALSE?

The list of international sanctions that determine where and with whom we can conduct our business is always the same, set once and for all.

2

MULTIPLE CHOICE

International trade laws can regulate business activities based on what factors?

- a. The destination of a product or service
- b. The end user of a product or service
- c. The components of a product
- d. The various ways to use a product or service
- e. All of the above

[Click here to see the answers](#)





CHAPTER 3

Acting responsibly

1. SUSTAINABILITY WITHIN CURIUM: MAKING A POSITIVE IMPACT

a) Embracing the ESG challenge

At Curium, we seek to act ethically and being socially and environmentally responsible while maintaining profitability and sound governance.

To that effect, Curium has developed an ESG strategy based on four pillars:

- Minimize environmental impact (E)
- Responsible workforce and beyond (S)
- Responsible business, maintaining & building trust (G)
- Focus on growth, lead in innovation and add value to society (Pharma).

These commitments are not only necessary to prepare Curium to future legislative requirements such as the ones set out in the EU Corporate Sustainability Reporting Directive ("CSRD") but they are also consistent with the legitimate expectations of our employees, our customers and our investors.

b) How does this work in practice?

Our commitment to ESG is materializing through various initiatives and actions. Thus:

- ✓ Regarding the first pillar ("Minimize environmental impact"), Curium has started to monitor the greenhouse gas ("GHG") emissions of its activities and we are investing in tools and resources to ensure (i) we can rely on accurate

and reliable data going forward and (ii) we develop the right actions to reduce our energy consumption and GHG emissions.

- ✓ We are also partnering with third parties and NGOs such as the [Climate fresh](#) to educate our employees on the likely implications of climate change for our operations and elaborate a climate change readiness plan for our production sites in particular.
- ✓ We have also adopted a specific [Environmental policy](#) that sets out various recommended best practices to reduce Curium's overall environmental impact.
- ✓ As set out in the first chapter of this Code of Ethics, Curium is committed to ensure a safe and respectful workplace. In practice, this means that we continue to prevent all forms of discrimination and ensure that all Curium employees are treated equally. We have set high standards for how we do business and expect the same from our suppliers in their own businesses and professional relationships. All our social and environmental expectations are outlined in our [Suppliers' Code of Conduct](#).
- ✓ The implementation of Curium's ESG strategy is monitored by a strong governance involving the company's senior leadership team and its Board of Directors.
- ✓ We are also auditing and reviewing our governance principles, policies and practices to ensure we adapt them to Curium's development and business reality. Hence, we have recently refreshed our [Anti-Fraud and Anti-Corruption policy](#).



1. SUSTAINABILITY WITHIN CURIUM: MAKING A POSITIVE IMPACT (CONTINUED)

c) What should I do if...?

One of my colleagues has recently participated in a Climate Fresk workshop and provided me enthusiastic feedback. How can I participate to the workshop too?

Many Climate Fresk workshops are launched in different countries. If you want to attend, please send your request to: esg.communication@curiumpharma.com. A member of the ESG team will get back to you with information on the upcoming workshops.

I work on a site, and I recently read Curium's environmental policy, which mentions the necessity of reducing energy consumption (and so reducing GHG emissions). On that matter, I just had an idea that could actively contribute to that purpose. How can I put it in place on my site?

All ideas aiming to reduce our energy consumption, as well as our GHG emissions, are welcome! You can suggest it to the site manager and the ESG team: esg.communication@curiumpharma.com. A member of the team will get back to you and discuss the feasibility of the project.

Curium is organizing a tender to source its new road transportation partner. Out of the three bidders, one is substantially more expensive than the others but relies on a fleet of vehicles that is already 50% electric and that will be 100% electric in less than 3 years. Based on the pre-approved selection criteria this vendor should be excluded from the tender because of their price position but you are not comfortable with such a decision. What should I do?

You should engage with Curium's Purchasing department and the ESG Manager to understand whether selecting such vendor could not bring other benefits to Curium. Furthermore, it may be that the selection criteria for choosing vendors should have placed greater emphasis on the reduction of CO2, considering the potential impact that selecting such a vendor could have on Curium's overall environmental footprint.





2. MANAGING COMMUNICATION RESPONSIBLY

a) Our commitment: ensure honest, transparent, and responsible communication

At Curium, we are proud of our work and we always communicate honestly, transparently, and responsibly.

Communication is a complex exercise and misunderstandings can easily happen. That's why only authorized representatives can communicate externally on Curium's behalf, including to the press and on social media.

- If you are authorized to communicate externally on Curium's behalf, all communication must be truthful, reliable, appropriately timed, and with Curium's authorization.
- If you are not an authorized representative, you should not answer any third-party request (from analysts, banks, journalists, press agencies, etc.) on behalf of Curium, and you must direct the request to the VP Head of Global Communications.

We understand and respect the value of confidential and proprietary information, be it Curium's or third-party information entrusted to us. We treat such confidential information with utmost care, be it related to intellectual property, strategic business planning, proposed investments or M&A transaction and, where relevant, we comply with laws and regulations applicable to the handling of material non-public information related to publicly listed companies.

b) How does this work in practice?

You should mainly use business communication tools for professional purposes, taking special care to apply the rules in this Code. If you are not an authorized representative but for some reason you cannot avoid providing an answer to a third-party, the only acceptable response before redirecting the request is "no comment". You should be mindful and aware of situations in which you could be perceived as communicating on Curium's behalf, for example on social media. You should follow these rules when posting, whether the account belongs to you personally or to Curium:

- ✓ **Align with Curium's values** and never harm Curium's reputation.
- ✓ **Only mention Curium when Curium specifically requests** for authorized Curium campaigns. Of course, this does not prevent you from mentioning a current or former position at Curium on LinkedIn or similar professional networks.
- ✓ **Use your best judgment on social media**, always act with decency, do not create a hostile work environment, and never be inappropriate or harmful to Curium or its Teammates colleagues.
- ✓ **Only share publicly available information**, never share commercially sensitive or confidential information. If you have any questions about the confidentiality of certain information, check with your supervisor or the [Compliance Office](#).
- ✓ Do not refer to or post images of Curium Employees, whether current or former, without seeking appropriate consent or authorization beforehand.



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2. MANAGING COMMUNICATION RESPONSIBLY (CONTINUED)

c) What should I do if...?

Can I repost or reshare Curium's news on my personal social media account, including posts about press releases?

Yes, employees are allowed and encouraged to share Curium's news on their personal social media accounts. Just please use language that shows you are sharing Curium's news, not speaking on behalf of Curium.

You can either repost without adding your own text, or with a short text that says you are reposting on your own behalf. Use language such as *"I'm pleased to share..."*, *"I'm proud"*, *"It's been a fantastic experience"*, *"When I think about working at Curium, I..."*, *"This news makes me feel..."* etc.

Can I create my own post when I attend an event (such as a congress or conference) as a representative of Curium?

Yes, but it should be clear that the post is personal and not on Curium's behalf. One way to do this is by addressing the post to your personal network, rather than the public. Use language such as *"If any of my network is attending the conference, come and see me at booth #..."*, *"I'm so excited to be attending the congress [...], if you are around, please let me know!"*

Can I share photos I have taken at team events with colleagues in the photos?

Yes, but only with prior permission from the colleagues in the photos. Your post should be clear that you are expressing your personal experiences or feelings about the event, and not sharing on Curium's behalf.

Can I announce a promotion, job change, or other personal success at Curium?

Yes, but your post can not share any sensitive or confidential information that could harm Curium. If you have questions or doubt, check with the VP Global Head of Communications before posting.

If I see a negative comment on Curium products, can I react publicly to defend our company?

No, never interact directly, whether the comment is positive or negative. Just keep a record and immediately inform the VP Global Head of Communications.





1. Make a positive impact

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2. MANAGING COMMUNICATION RESPONSIBLY (CONTINUED)

Can I browse social media while at work?

Only in a very limited manner. Social media should not interfere with your professional responsibilities or Curium's business, and Curium's computer systems are for business purposes only.



READ MORE

Read more in the detailed [Curium Communication Policy](#).

Self Check

Take just 2 minutes to check your understanding of Chapter 3, Section 1

1

TRUE OR FALSE?

You can never, without exception, post photos of your Curium colleagues on social media.

2

CHOOSE THE RIGHT ANSWER

What should you say if a third-party asks you a question on a topic about which you are not authorized to speak?

- a. "That project is going well!"
- b. "Who told you about that?"
- c. "No comment."
- d. Nothing at all

Click here to see the answers



3. MANAGING PERSONAL DATA RESPONSIBLY

a) Our commitment: live up to the trust of our clients, Teammates, and business partners by respecting privacy

Our value of trust includes taking responsibility for ensuring the privacy of individuals. We value all personal information entrusted to us and work hard to protect it. We are committed to protecting the privacy and confidentiality of all information we gain access to while doing business and using the necessary technology to do so.

When you are involved in accessing or processing personal data, you must familiarize yourself and comply with the rules set out in this Section of our Code, as well as [Curium's Privacy Policy](#) and any relevant legal and contractual requirements that apply to the situation. If you have any questions or need help, just reach out to the [Compliance Office](#).

It is essential that Curium and all of its Employees properly follow and apply all applicable data protection laws as we are committed to take proper care of the personal data we handle and protect the data rights of the people whose personal data we process, be they our teammates, our customers, our suppliers, or the patients we support as the case may be.

b) How does this work in practice?

Personal data is generally defined as **any information relating to a specific individual, whatever the format, that can make such person identified or identifiable.** This can include name, identification number, photo, email address, location data, on-line identifier, as well as physical, physiological, mental, economic, cultural, or social identity details of an individual.

Given our industry, you should also be aware of the concept of **sensitive data**, which can include:

- protected health information.
- genetic or biometric data used for the purpose of uniquely identifying someone.
- racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership.
- a person's sex life or sexual orientation.

The usage of such sensitive data is often prohibited and when it's authorized, is usually subject to strict restrictions.





3. MANAGING PERSONAL DATA RESPONSIBLY (CONTINUED)

When it comes to all personal data, **Curium and all of its Employees commit to:**

- ✓ treat all personal data in a **lawful, loyal, and transparent way**.
- ✓ **acknowledge** all personal data that is collected and processed.
- ✓ require and confirm that **all collected and processed personal data is indeed necessary** in regard to Curium's activities.
- ✓ ensure that **every data subject's rights are respected** (right to access, right to erasure, right to rectification, right to restriction of processing, right to data portability, right to object).
- ✓ ensure Curium is **able to share personal data under the applicable privacy laws**.
- ✓ only work with processors that have implemented **sufficient technical and organizational measures that meet GDPR or any applicable laws requirements**, including secure processing and all other applicable rules, and
- ✓ **make sure Curium's Employee records are kept up to date** by notifying the company of any relevant change in one's personal information.

Who is in charge of handling data protection matters and issues at Curium?



- Although every Curium Teammate is responsible for making sure personal data is protected, the **Compliance Office** will select specific people to serve as its representatives responsible for data protection matters (known as a data protection 'Responsible Person'). Each Responsible Person can be reached at: Compliance.Office@curiumpharma.com.





1. Make a positive impact

2. Manage communication responsibly

3. Manage personal data responsibly

4. Use company assets responsibly

3. MANAGING PERSONAL DATA RESPONSIBLY (CONTINUED)

c) What should I do if...?

We are a nuclear medicine company, so we have to use health personal information. How do we do it?

Processing protected health information may be necessary in very specific **pharmacovigilance** situations or within the context of clinical trials. If you are involved in activities that require the processing of sensitive health information, please review Curium's privacy policy and do not hesitate to reach out to Curium's [Compliance Office](#) for guidance.



Definition

Pharmacovigilance: the science and activities related to detecting, assessing, understanding, and preventing negative or adverse effects and related problems in medicines and vaccines.



What if I need to share personal information with third parties?

This is allowed as long as there is a legitimate business need and a proper legal basis. Depending on the use of the information by the third party, certain contractual provisions may need to be entered into between the parties. Please refer to Curium's privacy policy and do not hesitate to contact Curium's Compliance Office for further guidance.

I have been diagnosed with an ongoing medical condition. How do I ensure this information is kept confidential and only shared with people who really need to know?

There is a balance between an employer's need for information and an employee's right to privacy. If information about your condition must be shared with Curium, you can ask your HR Business partner to demonstrate to you that the health information is being specially protected and that access to this information is limited specifically to managers or people in HR that genuinely need to know in order to carry out their job.



A manager located in the UK requests access to the salary files of all the employees reporting directly and indirectly to him globally. The HR colleague receiving the request is concerned about sharing personal data of employees located in Europe not reporting directly to the manager due to the restrictions on international Data Transfers outside of the EU imposed by GDPR. Is this legitimate?

It is good practice to ask yourself such a question. At Curium, we are committed to apply the highest standards in relation to international data transfers. In that particular example, the manager is located in the UK, which is considered as safe as the EU for personal data protection purposes, so the employee data can be shared with the UK based manager provided that other protective measures are in place such as, notably:

1. Making sure that there is good legal basis for sharing the data
2. Making sure that the personal data is password protected and shared on secured systems
3. Only share the data that is necessary to achieve the desired purpose, and
4. Only share the data on a "need to know" basis.





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3. MANAGING PERSONAL DATA RESPONSIBLY (CONTINUED)



READ MORE

Read more about how to protect personal data in our [Privacy Policy](#).

Self Check

Take just 2 minutes to check your understanding of Chapter 3, Section 2

1

MULTIPLE CHOICE

Which of these could be considered personal data?

- ☐ a. My Curium ID number
- ☐ b. A video of me
- ☐ c. My fingerprint
- ☐ d. Information about my health

2

FILL IN THE BLANKS

The right to ensure that your personal data is kept up to date is called the right of r_____.n.

The right to know what personal information an organisation holds on you is called a_____s right.

[Click here to see the answers](#)



4. MANAGING OUR ASSETS RESPONSIBLY

a) Our commitment: use all of our assets responsibly to protect our business and reputation

Curium's success depends on properly managing and securing our assets and information, which in turn protects our business and reputation.

Curium's assets are made up of a wide range of property, including information, computers, telephones, software, product plans, strategy documents, and similar items. Every single Curium asset is key to our success. Everyone entrusted with Curium property is responsible for its protection and correct use.

b) How does this work in practice?

Intellectual Property

- Curium's intellectual property is one of our most valuable assets and helps set us apart from our competitors. You must vigilantly safeguard our patents, trademarks, copyrights, trade secrets, business knowledge and methods, and all other sensitive information owned by Curium that is not meant to be shared publicly (also known as proprietary information). Any unauthorized use or disclosure of this proprietary information (including intellectual property) could harm Curium's business and reputation.

Confidential Information

- Every person working for Curium must protect confidential information from improper use, sharing, or disclosure. All communication of confidential information must be limited to those who need the information in order to carry out their work. Confidential information received from others (outside of Curium) must be treated the way we expect others to treat information received from us, and based on the contractual terms that apply to the information being shared. Any proprietary information received from a third party that Curium did not specifically ask for should be refused. If you unintentionally receive any such information, notify the [Compliance Office](#) immediately.

Electronic devices

- Protecting our business information and reputation depends on properly handling and protecting Curium devices. This is so important that we've created a specific [Acceptable Use Policy](#) to explain the rules that apply when using Curium devices and technology, which you should be sure to read and comply with.



1. Make a positive impact

2. Manage communication responsibly

3. Manage personal data responsibly

4. Use company assets responsibly

4. MANAGING OUR ASSETS RESPONSIBLY (CONTINUED)

c) What should I do if...?

One of our customers has heard rumors about a new product that we are considering for a patent application and asked me about it. What can I tell them about the new product?

Talking to the customer about the new product could jeopardize Curium's right to obtain the patent, so you should talk with the [Compliance Office](#) before discussing the new product in any way.



I just joined Curium after working for a competitor, where I obtained a lot of information that I think could be useful. Can I share this information with Curium?

No. You are not allowed to share confidential information even if Curium's own confidentiality requirements don't apply to it. Sharing this information could put both you and Curium at risk, and could also harm your former employer.



Self Check

Take just 2 minutes to check your understanding of Chapter 3, Section 3

1

FILL IN THE BLANK

Assets like trade secrets, copyrights, trademarks, business knowledge, and patents are known as

_____.

2

RIGHT OR WRONG?

A friend of mine works for a competitor in a country where Curium does not operate. He asks me some technical information about our manufacturing process and I'm considering sharing that information with him since our companies do not compete.

[Click here to see the answers](#)



Self Check Solutions

CHAPTER 1

1**TRUE OR FALSE?**

Our Code only applies to me when I'm at work or with people from work.



False. The Code of Ethics is primarily built as a set of best practices to follow in our work related activities, what you do with your personal time outside the office may have an impact on how Curium is represented, and it is necessary to follow the Code at all times.

2**CHOOSE THE RIGHT ANSWER**

If I believe someone has violated the code and I make a report:

- a. my report will automatically be anonymous
- b. it must be made to my direct manager no matter what
- c. I will be protected against retaliation in response to my report

**Answer c is correct.**

When filing a report with the Compliance Office, you can request to remain anonymous - but reporting anonymously is not possible everywhere.

What matters most is that you share your concern, no matter what reporting route you choose to take. Speak to whoever you feel most comfortable with depending on your situation.

Curium protects people who make reports (also known as a whistleblower) and will make sure you are adequately supported when needed.

← [Click here to go back to Chapter 1](#)

CHAPTER 2 SECTION 1

1**FILL IN THE BLANK**

Coordinating bids or RFQs with competitors is known as _____, which is illegal.



Bid rigging. Submitting a joint offer with a competitor might be allowed with the Compliance Office's approval, but bid rigging is always illegal.

2**MULTIPLE CHOICE**

The benefits of fair competition include:

- a. Lower prices for consumers
- b. Less choices for consumers
- c. Better access to resources, products, and services
- d. Avoiding legal problems
- e. All of the above

**The correct answer is "all of the above".**

When businesses compete fairly, this results in more choices because companies will try to win consumer business by innovating and improving their products and services. This also brings competitive and fair prices for those choices, easier access to the things consumers need, and, as an added bonus, keeps us out of legal trouble.

← [Click here to go back to Chapter 2, Section 1](#)



Self Check Solutions

CHAPTER 2 SECTION 2

1

CHOOSE THE RIGHT ANSWER

What can change a gift or business expense from being okay to being corrupt?

- a. When I pay with my personal credit card
- b. When I get something in return
- c. When it involves quid pro quo
- d. When it involves someone from another country



Quid pro quo. There's nothing wrong with a gift or payment under the appropriate circumstances. But when something of value is given in exchange for a specific action or inaction in return, it might be a corrupt activity.

2

FILL IN THE BLANK

Curium's relationships with _____ require extra care when it comes to being transparent and honest.



Healthcare professionals. Because healthcare professionals have significant influence on patients' decisions in a highly regulated industry, we must demonstrate the highest possible integrity in these relationships.

← [Click here to go back to Chapter 2, Section 2](#)

CHAPTER 2 SECTION 3

1

TRUE OR FALSE?

A gift is okay if it's worth \$100 and in cash because it doesn't have to be recorded.



False. Although gifts worth less than 200€ or \$250 are generally okay, cash gifts are not allowed and every gift must be accurately shown in our records.

2

CHOOSE THE RIGHT ANSWER

To which of these people can I offer a job?

- a. My partner's doctor, who might endorse a Curium product
- b. The son of my country's elected representative, who could help make a law more beneficial for Curium
- c. A recent graduate with a biochemistry degree who just learned about Curium and meets the hiring criteria
- d. A sales director at a company Curium buys products from who could get us a discount



The recent graduate. Hiring any of the others could generate conflicts of interest and/or constitute a possible bribery or act of corruption if the job offer is meant to influence a decision that would affect Curium.

← [Click here to go back to Chapter 2, Section 3](#)



Self Check Solutions

CHAPTER 2 SECTION 4

1

TRUE OR FALSE?

The list of international sanctions that determine where and with whom we can conduct our business is always the same, set once and for all.



False. These lists change often which is why you should regularly check in our detailed policy.

2

MULTIPLE CHOICE

International trade laws can regulate business activities based on what factors?

- a. The destination of a product or service
- b. The end user of a product or service
- c. The components of a product
- d. The various ways to use a product or service
- e. All of the above



All of the above factors are relevant for international trade compliance purposes.

← [Click here to go back to Chapter 2, Section 4](#)

CHAPTER 3 SECTION 2

1

TRUE OR FALSE?

You can never, without exception, post photos of your Curium colleagues on social media.



False. You are allowed to post photos of your colleagues *as long as* you have their permission beforehand and your post meets all the other requirements of this Section.

2

CHOOSE THE RIGHT ANSWER

What should you say if a third-party asks you a question on a topic about which you are not authorized to speak?

- a. "That project is going well!"
- b. "Who told you about that?"
- c. "No comment."
- d. Nothing at all



The best answer is nothing at all, but we are aware that this might not always be possible. So if saying nothing at all will not work, you must respond with "no comment." And no matter what you say, always report the conversation to the Compliance Office immediately.

← [Click here to go back to Chapter 3, Section 2](#)



Self Check Solutions

CHAPTER 3 SECTION 3

1

MULTIPLE CHOICE

Which of these could be considered personal data?

- a. My Curium ID number
- b. A video of me
- c. My fingerprint
- d. Information about my health



All four of these are considered personal data and must be protected accordingly.

In fact, your fingerprint and health information are considered sensitive data, which requires even more protection and care.

2

FILL IN THE BLANKS

The right to ensure that your personal data is kept up to date is called the right of r_____n.

The right to know what personal information an organisation holds on you is called a____s right.



Right of rectification; Right to access.

← [Click here to go back to Chapter 3, Section 3](#)

CHAPTER 3 SECTION 4

1

FILL IN THE BLANK

Assets like trade secrets, copyrights, trademarks, business knowledge, and patents are known as _____.



Intellectual property. These assets are incredibly important to ensuring Curium's success, so we are all responsible for ensuring intellectual property is properly handled and protected.

2

RIGHT OR WRONG?

A friend of mine works for a competitor in a country where Curium does not operate. He asks me some technical information about our manufacturing process and I'm considering sharing that information with him since our companies do not compete.



Wrong. Protecting Curium's know how is so important that we created a separate policy to make sure you fully understand the rules. Be sure to read this and all other policies included in this Code any time your situation calls for it.

← [Click here to go back to Chapter 3, Section 4](#)



Contact: Compliance.office@curiumpharma.com
To raise a concern, visit the [Reporting Line](#)