



Our Code of Conduct

With Integrity  
and Passion



# Contents

## 02

<b>Introduction</b>	
Statement from the Board	03
The Core of our Leitbild	04
Who we are	04
Preamble	05
Transforming lives for generations	06
How our guiding principles direct us	07
How every one of us responsibly promotes and sustains our corporate culture of integrity	08
How we change lives	09
Together we excel	09

## 10

<b>Speak Up</b>	<b>10</b>
Our Speak Up culture	11

## 12

<b>Committed to care</b>	<b>12</b>
Research and development	13
Interactions with customers and stakeholders	14
Quality	15
Patient safety & pharmacovigilance	16

## 17

<b>The way we work</b>	<b>17</b>
Conflict of interest	18
Data protection	19
Social media and public relations	20
Antitrust and fair competition	21

## 22

<b>Collaborate for success</b>	<b>22</b>
Purchasing and supplier relations	23
Export control & trade	24
Secure handling of information	25
Prevention of bribery and corruption	26
Insider trading	27
Political activities	28

## 29

<b>We take responsibility</b>	<b>29</b>
Human rights	30
Respect for environment, health & safety	31
Fair treatment, anti-discrimination, and inclusion	32
<b>Contact for further questions</b>	<b>33</b>



**Dear Colleagues,**

At Boehringer Ingelheim, we're passionate about the health and wellbeing of humans and animals alike. Therefore, we're dedicated to developing innovative solutions for human and veterinary medicine, while being responsible corporate citizens.

The way we achieve our goals and the impact of our actions on patients and society matters. Our Code of Conduct is our promise to maintain the high standards of integrity and compliance in everything we do. It's our compass for our actions and behavior both within the company and externally.

By adhering to the principles in our Code of Conduct, we foster excellence, accountability, and respect throughout our organization. Each of us, regardless of role or level of responsibility, must embrace and champion these principles.

Let's build a legacy together that goes beyond profits, where our actions and decisions positively impact the lives of millions of patients. By adhering to our Code of Conduct, rooted in the Core of our Leitbild, we demonstrate that we are a trustworthy and responsible pharmaceutical company who will always put the patient at the center of our actions.

Sincerely yours,

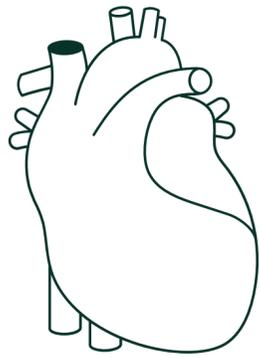
**Hubertus v. Baumbach Carinne Brouillon Paola Casarosa**

**Shashank Deshpande Frank Hübler Michael Schmelmer**



## The Core of our Leitbild

# Who we are and what we strive for



### We are independent, family-owned and intend to remain so

We are driven by the desire to serve humankind by improving human and animal health.

We feel responsible for our communities and are respectful of our resources.

We plan in generations and focus on long term performance.

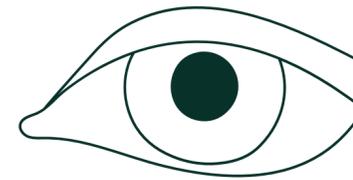


### We create value through innovation for our customers

We develop breakthrough therapies and health care solutions in areas of unmet medical need.

We excel in innovation and deliver the highest quality to drive our competitiveness.

We believe in partnering for success and the sustainable economic health of the company.



### We are powered by our people

We nurture a diverse, collaborative and open environment, which appeals to the best people.

We are driven by results, working with integrity and passion.

We treat each other with respect, trust and empathy, and we grow together.



we care

## Preamble

Since 1885, Boehringer Ingelheim has been a family-owned, global leader in research-driven bio-pharmaceuticals. Our diverse team of managers and employees work together to improve the health of people and animals worldwide. We create value through innovation, developing breakthrough therapies and healthcare solutions in areas of unmet medical need – for our customers, for our patients, their loved ones and for society.

Our Code of Conduct sets the ethical standards that guide our business activities across Human Pharma, Animal Health, Biopharmaceutical Contract Manufacturing, and the Enabling Functions.

Note: Boehringer Ingelheim, in this Code of Conduct, always refers to the Boehringer Ingelheim Group and its controlled entities.

In this Code of Conduct, “we” refers to everyone at Boehringer Ingelheim – employees, managers, and the Board of Managing Directors.

It’s about all of us, and each individual plays a vital role in bringing the Code of Conduct to life. We achieve this with a personal commitment and a passion for integrity.





# Transforming lives for *generations*

Our work at Boehringer Ingelheim is motivated by the desire to not only improve, but **‘transform’** lives for the better by improving both human and animal health.

Transforming **‘lives’** refers to the broad impact that our work has on health, in the healthcare sector and beyond it.

**‘For generations’** reflects the long-term thinking which guides us, and highlights our commitment not only to the present, but to future generations and the vital importance of sustainability. It mirrors the impact we have not only on individuals, but across generations.

To achieve this, we all must be accountable and take responsibility for our actions, both in the workplace and when interacting with external stakeholders.

# Our guiding principles

## How our guiding principles direct us

Healthcare companies' activities directly impact many stakeholders and consequently, society. To govern this, our industry is highly regulated. We welcome this because it protects patients in human and veterinary medicine. We all act with honesty and integrity, comply with applicable laws, regulations and industry practices, and exercise reasonable judgment when conducting business on behalf of our company.

At our company, we set high expectations for ourselves – not only of our research and our products but also in everything we do. We always consider how our actions may impact our stakeholders. To ensure this, we have guidelines and procedures in place. We understand that these cannot cover all situations we may encounter and may face situations where the correct course of action is unclear. But our guiding principles empower us to do the right thing and make ethical decisions.

This Code of Conduct is not the only document that outlines the expected behaviors for all of us who work on behalf of the company. Additional standards, along with Boehringer Ingelheim's specific policies and guidelines, provide further guidance and supplement this Code.

# How every one of us responsibly promotes and sustains our corporate culture of integrity

At our company, we nurture a *culture of integrity* by emphasizing the importance of our Code of Conduct. We remain steadfast in upholding our principles, even when faced with pressure or coercion.

Our leaders and managers recognize the increased ethical and legal responsibilities of their position and strive to set a positive example.

We foster an open work environment by always keeping our door open to team members for their feedback, ideas, questions, and concerns.

Our leaders hold themselves and our employees accountable for understanding and following our Code of Conduct, while also promoting behaviors that benefit our company and its stakeholders.

When an employee reports a suspected violation, our leaders handle the situation with care. They take swift action if our Code of Conduct, our policies and procedures or the law are breached or suspected to be breached.

In cases involving an ethical dilemma, we seek the best possible course of action. In case of doubt, we consult our local Compliance & Integrity manager or the responsible subject matter experts for guidance.





## How we change lives

At Boehringer Ingelheim, our team spirit is all about making a real difference. We're proud to serve different patients (Human & Animal Health).

We must all comply with legal and social rules & standards wherever we are active in the world – at all times and at all levels.

We expand our own wide-ranging research & development through partnerships with academic institutes, biotech companies and public research institutes all over the world.

We hold ourselves and Third Parties working on our behalf to the high ethical standards of our Code of Conduct and further guidelines, fostering a culture of integrity and accountability.

## Together we excel

We believe that strong, essential rules are the foundation for successful joint work. By working together, we bring our purpose to life – transforming lives for generations. We're committed to excellence, every step of the way.

We are all accountable for our behavior. At the same time, we respect, support and help each other to make ethical decisions.

We recognize the importance of sharing ideas and collaborating with colleagues and with our manager.

If uncertainties exist, we consult with the responsible colleagues and/or the local Compliance & Integrity manager.

Our decisions shape how Boehringer Ingelheim is perceived by patients, its business partners and the communities in which we serve.

# Speak Up





# Our Speak Up culture

At our company, we value each and every employee – and are powered by our people. We encourage you to give your best every day and provide a safe space to Speak Up. If you see actions that don't align with our values, we're here to listen and take action.

As an innovation-driven pharmaceutical company, we understand that mistakes can lead to new experiences, insights, and knowledge. We promote open, honest, trustful, and respectful exchanges with one another. However, violations of this Code of Conduct, our policies and procedures or the law can harm our company and, consequently, all of us.

Therefore, we expect anyone who feels that any activity or behavior contradicts our Code of Conduct, our policies and procedures or the law, to report concerns through appropriate reporting channels.

We all have a responsibility, as colleagues or supervisors, to ask questions and raise concerns.

Our integrity culture depends on us. Reporting potential misconduct helps us maintain our integrity and passion.

## Reporting Channels:

- Line manager
- Local Compliance & Integrity manager
- Local HR department
- Speak Up portal

We treat all reports confidentially, where possible, while adhering to legal obligations. Reports of possible breaches of regulations are followed up carefully, objectively and promptly.

When we speak up in good faith, our company will always protect us from retaliation.

[Speak Up portal](#)

# Committed to care



# Research and development

Boehringer Ingelheim’s research aims to enhance the health of people and animals worldwide. We strive to advance breakthrough therapies that address unmet medical needs. In our research and development activities, we uphold the highest ethical, scientific, and medical standards to protect our patients. We conduct our research with integrity and in compliance with all applicable laws, regulations and ethical guidelines such as the Good Research Practices, Good Laboratory Practices and Good Clinical Practices. Our company has established procedures that align with these standards, and we continuously monitor them to ensure adherence with changing regulatory requirements.

A pharmaceutical company works with animals to improve research and ensure the quality of its products. At Boehringer Ingelheim, we prioritize a “culture of care”, meaning we treat our research animals with care and compassion.

## This means for us:

- We apply the high ethical and legal standards to all research and development activities
- We do all that is necessary to ensure the safety and well-being of patients who participate in our research trials
- If it is necessary to work with animals, we treat them with care and compassion
- We only select external partners or providers of animals or animal-related services that adhere to the same ethical principles
- We are committed to publicly disclosing information about our research studies and their results
- We conduct our research in compliance with all applicable laws, regulations, and ethical guidelines



# Interactions with customers and stakeholders

At Boehringer Ingelheim, we value collaboration with our customers and various stakeholders. These interactions foster collaboration and bring more health to patients and animals.

We interact with external stakeholders with honesty, fairness, and integrity.

We never manipulate treatment decisions or exert undue pressure on stakeholders regarding our activities and products.

## This means for us:

- We provide truthful, accurate, fair, and balanced information to healthcare providers and other stakeholders, enabling them to make informed decisions
- We respect the independence of human and veterinary healthcare providers for treatment decisions
- We ensure that all forms of collaboration or professional relationship with our stakeholders are based on a legitimate business need and aligned with our company policies and procedures
- We ensure that any compensation paid by us to healthcare stakeholders is based on the fair market value of the services being provided
- We comply with all applicable laws, regulations and industry standards governing our engagements with customers and stakeholders, including transparency laws and industry self-regulations





# Quality

At Boehringer Ingelheim, we know that global and local regulatory requirements set the baseline for the quality of the products we make. But we aim higher. We strive to meet the highest quality standards to ensure that our products are safe and effective.

Our commitment to quality is rooted in our mission statement, “Quality in all we do”. Our shared beliefs, values, attitudes, and behaviors shape our approach to everything we do. Quality goes beyond our research, development and manufacturing. It extends throughout our supply chain from all sources. Our goal? Position quality as a competitive advantage for seamless, safe and reliable distribution of our quality medicines to patients.

## This means for us:

- Prioritizing the impact on patients in everything we do
- We live our quality culture and speak up when we see something is wrong
- We carry out our work with the highest level of integrity and hold ourselves and our team accountable
- We challenge the status quo and proactively identify ways to improve our processes and products to achieve operational excellence
- We analyze and mitigate risks and act on any issue that could impact the safety, quality, or compliance of our products
- We comply with all regulatory requirements, policies, and operating procedures



# Patient safety & pharmacovigilance

At Boehringer Ingelheim, we're driven to enhance the lives of people and animals across the globe. A key part of this mission is striking the right balance between the benefits and risks of our products.

Our global and local Patient Safety & Pharmacovigilance constantly keep an eye on the safety of our medicines. With solid medical and scientific expertise, they assess data and create proactive strategies to minimize potential risks to patients and consumers. This way, we achieve the best possible benefit-risk balance.

We foster a culture that is committed to patient safety and compliance with pharmacovigilance regulations worldwide. Each of us is responsible for promptly reporting any discovered adverse events or information relevant to patient safety. By doing so, we contribute to the safety of our products and ensure that we adhere to regulatory requirements. Together, we safeguard the well-being of our patients.

## This means for us:

- We place the highest priority on the safety and well-being of patients who use our products
- We take actions and make choices aimed at achieving optimal patient safety and public health outcomes
- We timely and accurately report adverse events or other safety-relevant information using our company procedures
- We share important safety information with patients, consumers, healthcare providers and health authorities to promote safe and effective use of our products
- We ensure that Third Parties acting on our behalf comply with our pharmacovigilance obligations



# The way we work





# Conflict of interest

We're all responsible to do what's best for Boehringer Ingelheim – in all we do.

An actual conflict of interest or relevant bias arises when our personal interest has the potential to influence our judgment, objectivity, and independence associated with a business decision or jeopardizes the interest of Boehringer Ingelheim.

## This means for us:

- Avoiding situations where a personal relationship or financial interest might influence how we make decisions
- We never accept or give anything of value as a condition of doing business with our company
- If a conflict of interest or relevant bias arises, or if a situation is unclear, we consult with our managers for further guidance
- We're committed to always act in the best interest of our company

# Data protection

At Boehringer Ingelheim we handle personal data from employees, patients, healthcare professionals, vets, pet owners and customers for various business activities. This data helps us in pursuing our goal, improving the lives of people and animals with our innovative solutions.

We, along with our business partners, are committed to protecting and responsibly using personal data and all other data sets, ensuring compliance with all relevant data protection laws and regulations by applying our data governance framework.

We collect the minimum information necessary for our business goals and disclose why and how we collect and use an individual's personal data within our organization.

By leveraging a commonly used data governance framework, we aim to make our data findable and accessible, enabling compliant and transparent usage across functions and departments.

## This means for us:

- We share personal data only with those stakeholders who have a legitimate need for it and will protect it
- We process personal data fairly, transparently and on a lawful basis
- We collect, use and retain personal data that is necessary for a specific business purpose
- We follow the appropriate company processes to report inappropriate disclosure or use of personal data
- We treat data as a company asset and guarantee the compliance and legal obligations by applying the data governance framework
- We follow company guidelines and applicable laws to prevent unauthorized or unlawful use, loss or damage of personal data and all other data





# Social media and public relations

We're committed to building a reputation of integrity and trust. We actively use diverse communication channels to share our purpose, values, and business initiatives honestly and accurately. Boehringer Ingelheim employs trained professionals to engage on the company's behalf across the various channels and with media.

Please do not speak on the company's behalf unless appointed by the appropriate functions.

When engaging in industry topics with your private accounts on social media, make sure to comply with local regulatory requirements and local company guidelines.

## This means for us:

- We exercise good judgment when engaging on social media
- We timely report any adverse events or product complaints we encounter in any social environment
- We refer requests from journalists and other stakeholders outside the company directly to the designated media spokespersons within Corporate Affairs
- We communicate in a responsible manner consistent with company policies, guidance, industry standards and applicable regulations

# Antitrust and fair competition

We strive to provide innovative therapies and healthcare solutions in areas where medical needs are unmet for our patients and communities. In the process, we always follow all competition and antitrust laws in our business activities, promoting free and fair competition worldwide. We never pursue a competitive edge through unethical or illegal practices. We avoid anti-competitive agreements with competitors, such as price fixing or collusion, and never abuse our market power.

## This means for us:

- We do not enter into any anti-competitive agreements with competitors – whether in writing, verbally or implied
- We never disclose any confidential or proprietary information to competitors such as information about prices, rebates and discounts, production costs and forecasts
- We gather competitive intelligence ethically and in compliance with legal guidelines
- We participate in tender procedures in a fair way without any form of manipulation
- Regarding our commercial policies and market conduct, we pay close attention when we believe we hold a dominant position in specific markets or for certain products
- We seek guidance from the Corporate Legal & Compliance department when questions emerge
- For any concerns involving compliance with competition and antitrust laws, we consult our local Legal & Compliance department



# Collaborate for success



# Purchasing and supplier relations

Our suppliers are crucial to our success, so we collaborate only with those who share our commitment to quality, service, sustainability, diversity, and ethical business practices.

We promote diversity and inclusion in our supply chain by offering opportunities to small and medium-size businesses and/or diverse-owned businesses where required.

In choosing suppliers, we also consider innovation, supplier performance, quality, total cost of ownership, legal requirements, sustainability including e.g., environment and human rights, health, and safety along the supply chain. Risk management tools like “Know Your Business Partner” help us to ensure risk areas are addressed.

We partner with suppliers who show integrity in line with our Code of Conduct. We expect them to obey all laws and regulations and stick to our Supplier Code of Conduct.

## This means for us:

- We make purchasing decisions based on pre-defined, factual, and transparent criteria, which are documented accordingly
- We utilize controls and other assessments to help detect, prevent, and remediate actual or potential non-compliant activities by our business partners
- We ensure that any provision of goods and services by a supplier is based on a contractual agreement
- We follow the principles of sustainable purchasing while ensuring that stakeholder requirements are met



# Export control & trade

We're dedicated to improving health worldwide with our services and products. At the same time, we also care about ensuring that our technology and products don't harm people or get used illegally.

Laws regulate the export and transfer of goods, software, technology, and services to protect human rights, maintain peace, and fight terrorism. These trade regulations and export controls can impact our business operations.

At Boehringer Ingelheim, we follow all applicable laws by setting company-wide standards for effective export control and trade compliance.

## This means for us:

- We immediately report concerns of suspected violations of sanctions or export-based restrictions
- We follow all trade and export policies and procedures, and comply with all applicable regulations and laws





# Secure handling of information

In our highly competitive industry, information is one of our most valuable assets. Protecting our data and intellectual property is crucial to Boehringer Ingelheim's long-term success.

We've implemented strong security measures, including proactive responses to evolving cyber threats. These measures minimize risks of unauthorized use or disclosure of information and ensure the availability and integrity of our data.

It's important that we protect our information across the entire lifecycle – during its creation, use, storage, transmission and deletion on all media. With a culture of security awareness everyone contributes to a secure digital environment. This creates trust and resilience in our IT systems and our company.

We respect the confidential information of our business partners with the same respect we expect for our own.

## This means for us:

- We control physical access to protect our people, sites, facilities, and information & communication systems
- We handle information with care independent of its form – digital, written or oral
- We appropriately use our IT devices, systems, and services such as the Internet and social media consistent with company policies and procedures
- We need to strive for a balance between sharing and protecting information. This means, we only share information with people who absolutely need to know it
- We are careful about how we handle business information in public spaces on business trips or even on social media
- We adhere to our confidentiality obligations even after our employment relationship has ended

# Prevention of bribery and corruption

Corruption harms our patients and communities. We advocate for transparent business practices and firmly oppose any bribery, corruption, or improper influence.

Interactions with public and government officials carry a higher risk of corruption. For this reason, we maintain strict ethical boundaries when interacting with them.

## This means for us:

- We never offer or promise anything of value to anyone to improperly influence their behaviors or decisions
- We never demand or accept a bribe, kickback or other improper benefit from anyone
- We do not make corrupt payments of any kind, including hidden kickbacks or facilitation payments
- We avoid even the appearance of bribery or corruption
- We adhere to the 4-eyes-principle
- We have internal controls in place to combat money laundering and terrorism financing
- We comply with all applicable anti-bribery and anti-corruption laws, regulations and company procedures





# Insider trading

Boehringer Ingelheim is committed to the integrity of financial markets worldwide. Although we're not a publicly traded company, we work with partners whose shares or securities are. This means we might come across material non-public information about these partners (Inside Information).

Using this Inside Information to trade, getting others to trade, or sharing it unlawfully is strictly forbidden. Such activities can lead to serious personal criminal penalties and harm the reputation of our company.

## This means for us:

- We remind ourselves we might receive Inside Information if we work on a project that involves business partners who are publicly listed
- We keep Inside Information confidential and only use it for the purpose it was provided
- We do not share Inside Information with anyone, including a family member or friend, who may use that information for trading
- We comply with Boehringer Ingelheim's insider trading regulations and applicable laws

# Political activities

We all have the right to engage in political activities personally. However, we strictly need to separate what we do as Boehringer Ingelheim representatives and what we do in our own time.

Political and public policy engagement are highly regulated, which can vary across countries.

At Boehringer Ingelheim, the Public & Government Affairs function in Corporate Affairs determines our political positions.

## This means for us:

- We refer statements on Boehringer Ingelheim's political position to the Public & Government Affairs function
- When engaging in personal political activities, we must be clear that our private opinion is separate from that of Boehringer Ingelheim
- In general, we do not support\* political parties, candidates, or campaigns on behalf of our company
- If we think that Boehringer Ingelheim should get involved on a cause, we contact the local Corporate Affairs team and follow the respective company process

\* Support such as political contributions, donations, endorsements





# We take responsibility



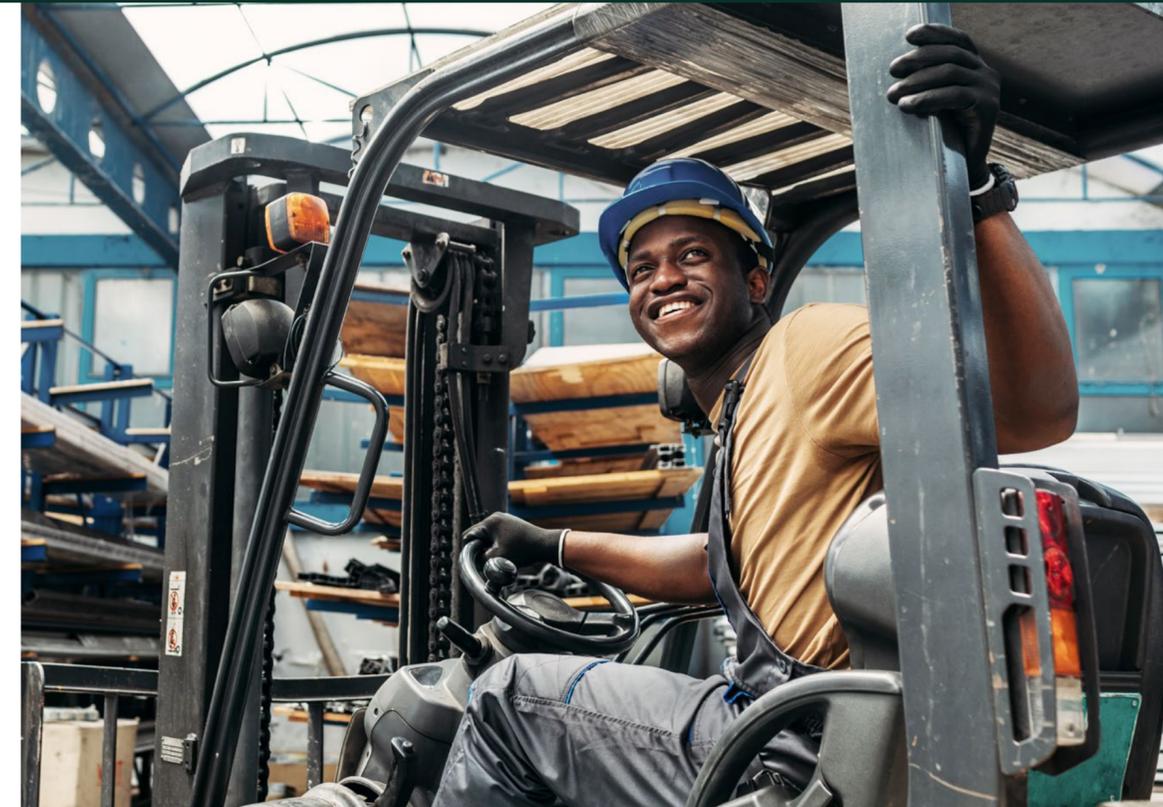
# Human rights

Human rights are the essential rights and freedoms everyone deserves, covering political, civil, economic, labor, social, and cultural aspects. At Boehringer Ingelheim, upholding human rights is a key part of our corporate responsibility. That's why we integrate respect for human rights principles and related environmental standards in all areas of our business.

We follow all relevant legal requirements and international human rights standards, monitoring and addressing any risks of violations within our company and supply chain. At the same time, we expect our suppliers to commit to these principles and put processes in place to respect human and related environmental rights.

## This means for us:

- We recognize and support the enforcement of fundamental human rights principles in our own operations and our Third Party supply chain
- We promote a workplace that is free from discrimination, harassment, or other forms of wrongful treatment
- We provide clean and safe working conditions
- We prohibit human trafficking and forced, bonded or illegal child labor
- We immediately report suspected violations of human rights at our company or in our relationships with our suppliers or business partners





# Respect for environment, health & safety

Our Environment, Health & Safety (EHS) principles shape how we run our company and are a vital part of Boehringer Ingelheim's **Sustainable Development – For Generations framework**.

We want to create long-term economic and social value for us, our stakeholders, our employees and the communities we serve, in line with our Leitbild "We are committed to sustainable development".

We're ambitious about protecting the environment for future generations, with goals like:

- Saving water by using it wisely and preserving water quality
- Cutting greenhouse gas emissions
- Reducing waste and promoting a circular economy

Our EHS Management System helps us to protect the environment and the health and safety of people affected by our business.

We seek business partners who share our social, ethical, and environmental values, and acknowledge our EHS culture. We support our partners in the global value chain in fulfilling their responsibilities.

## This means for us:

- We support the Boehringer Ingelheim's **Sustainable Development – For Generations framework**
- We support the Company's environmental protection goals by taking concrete measures at our workplace/in our team
- We maintain a safe working environment
- If we see opportunities to improve the safety of our operations, we draw attention to it
- We immediately report safety or environmental hazards in our workplace
- We comply with all applicable occupational safety regulations and internal guidelines



# Fair treatment, anti-discrimination, and inclusion

At Boehringer Ingelheim, we believe in respect, trust, and empathy. These values lay the foundation for successful teamwork, where fairness and equity shine. We're all in this together, working to create a workplace free of discrimination and harassment.

We shape an inclusive environment and support each other. Our diverse and unique teams are our strength, allowing everyone to flourish. It's this mix of talents that sparks exceptional creativity, innovation, and excellence.

## This means for us:

- We respect and value diverse individual characteristics, different perspectives, and distinctive backgrounds of our people
- We actively contribute to a work climate of mutual trust, fairness, and inclusion
- We stand firmly against any form of discrimination or harassment and retaliation
- If we discover language or conduct that opposes these principles, we speak up, take action to correct the situation and support the person affected



# Contact for further questions

Our Code of Conduct guides us toward achieving our mission: to improve the health of people and animals worldwide.

We create value through innovation, developing breakthrough therapies and healthcare solutions – with a clear commitment towards ethical work practices, making us a leader in both medicine and corporate culture.

We're in this together.

If you have questions about our guidelines, ethical principles, or Code of Conduct, please contact your local Compliance & Integrity manager for help.

Concerned about potential misconduct by a colleague?

#### Reporting Channels:

- Line manager
- Local Compliance & Integrity manager
- Local HR department
- Speak Up portal

Your involvement helps make Boehringer Ingelheim even better – with integrity and passion.

Speak Up!

