Advanced Therapeutics within Everyone's Reach

Global Good Marketing Practices Policy

2025.07

Global Compliance Team

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Article 1. Introduction

1.1 Preamble

Global Good Marketing Practices Policy ("this Policy") is made to ensure Celltrion, Inc. and its subsidiaries, affiliates, and international entities (collectively "the Company", "Celltrion Group" or respectively "a Celltrion Local Entity") set forth the compliance standards with respect to marketing activities of the Company's products. All marketing activities must comply with applicable laws, regulations, industry codes, and the requirements outlined in this Policy.

1.2 Scope

This Policy applies to the Company officers, directors, employees, agents, contractors, and other third parties who participate in or conduct activities with or on behalf of the Company. Employees who engage third parties must ensure those third parties are informed of the requirements set forth in this Policy and agree to adhere to them.

1.3 Definitions

The capitalized terms used in this Policy shall have the general meaning ascribed to them as follows unless otherwise indicated.

Anything of Value – Any benefit or gain offered or paid that includes cash or cash equivalents; business meals; Gifts; hospitality; entertainment; travel expenses including airfare and lodging; offers of employment; political contributions; charitable donations; fee for service arrangements; funding arrangements; Grants; Sponsorships; Samples; or others.

Conflict of Interest – A conflict of interest exists when an individual's actual or potential interests or loyalties (such as a fiduciary responsibility) may influence the exercise of their independent judgment in the performance of the Company contracted duties. An actual or potential interest includes but is not limited to financial gain, career advancement, outside employment, personal considerations or relationships, investments, gifts, payment for services and board memberships.

Continuing Medical Education (CME) – CME helps ensure that HCPs obtain the latest and most accurate information and insights on therapeutic areas and related interventions critical to the improvement of patient care and overall enhancement of the healthcare system.

Donation and Grant – An arrangement where the Company provides funds to a non-profit

or for-profit eligible organization for a defined purpose such as support of HCP education, other educational programs, patient association initiatives or other healthcare-related initiatives, without an exchange for something of value to the Company.

Educational Items – Items provided to HCPs for their education or the education of patients on disease and its treatments.

Fair Market Value (FMV) – An estimate of the value of a service or good, based on what a knowledgeable, willing, and unpressured buyer, acting at arm's length, would pay to a knowledgeable, willing, and unpressured seller in the market.

Gifts – The voluntary transfer of property by the Company or its representatives to an external party, including HCPs. A Gift confers a personal benefit to the recipient and may be given without any expectation of receiving any value in return.

Healthcare Organization (HCO) – shall mean:

(1) an organization that is comprised of healthcare professionals or academic institutions, specialty societies, or patient care organizations that provide healthcare services or conduct healthcare research and training;

(2) an entity which reimburses or pays for prescription pharmaceuticals such as sovereign or government health funds, insurance companies and other payers;

(3) a professional society or a committee or agent thereof, including those at the national or local level, of physicians, dentists, or other health care practitioners that engages in professional review activity through a formal peer review process, for the purpose of furthering quality health care.

(4) entities that purchase or dispense prescription pharmaceutical products in in or out-patient settings.

Healthcare Professional (HCP) – Any individual who can, in his or her professional capacity, influence the use, purchase, prescription or recommendation of the Company products or affect the formulary or other preferential or qualifying status of the Company products.

"HCP" includes, but is not limited to, the following individuals: licensed healthcare professionals and their staff (e.g., physicians, nurses, pharmacists, office managers, receptionists, nurse practitioners, physician assistants, medical students, residents, fellows, etc.); employees of purchasers (hospitals, payers, group purchasing organizations, etc.);

clinical investigators and their staff; and members of the scientific community (e.g., scientist in academia and the public or private sector).

Home Country – A country where a HCP or a Healthcare Organization has its primary practice, principal professional address or place of incorporation.

Host Country – A country where the meeting or event is held.

Investigator – A qualified HCP who conducts a clinical trial or similar research activities. In the event a research activity is conducted by a team of individuals, the investigator is the responsible leader of the team.

Investigator Initiated Trial (IIT) – Investigator Initiated Trials are unsolicited pre or non-clinical, clinical outcomes or disease state research, related to a the Company compound or therapeutic area in which the Investigator, organization or institution (academic, private, or governmental) serves as the regulatory sponsor and independently generates a research protocol and for which the Company provides support in the form of study funding and/or drug.

Market Research – Market Research, which includes social and opinion research, is the systematic gathering and interpretation of information about individuals or organizations using the statistical and analytical methods and techniques of the applied social sciences to gain insight or support decision making.

Medical Utility – Items that are beneficial to enhancing the provision of medical services and patient care.

Non-Promotional Material – Any material (verbal or written) intended to be used for scientific exchange activities, and not promoting any product (including approved the Company products). This includes information on a particular disease state or class of products or treatments used in a non-promotional context.

Outcomes Research – Activities designed to obtain the necessary data to provide sophisticated, informative reports relating to the reimbursement issues or health patient outcomes associated with a particular medical product. Outcomes Research evaluates the effect of health care interventions on patient health status involving economic, clinical, or humanistic outcomes.

Preceptorship Programs – Non-promotional programs designed to give the Company employees additional training programs by an HCO and its HCPs in a clinical setting to

enhance employees' understanding of a disease state or applicable treatment in the Company therapeutic or strategic area of interest.

Promotional Aids – Items of minimal value that have product-promotional intent.

Promotional Material – Any verbal or written interaction, associated materials or activities, undertaken, organized, or run by the Company that is directed at Healthcare Professionals or Healthcare Organizations to promote the prescription, recommendation, supply, administration, sales or consumption of the Company products. Such interactions may occur through direct discussion, hard copy materials, or other media, including social media. Promotional Material must be consistent with a product's approved label and approved in accordance with the applicable Company SOPs.

Samples – Free product samples of the Company medicines that are provided to Healthcare Professionals so that patients and their Healthcare Professionals can become familiar with the medicines.

Sponsorship – An arrangement where the Company provides funds to an organization or HCP in exchange for something of value to the Company, including tangible benefits and/or an intangible benefit such as recognition.

Third Party – An external individual or group, under written contract with the Company, providing specific services for the Company and thereby acting on behalf of the Company. Examples include marketing firms, event management organizations, clinical research organizations, contracted sales organizations, joint venture partners, and suppliers.

Chief Compliance Officer – Chief Compliance Officer or "CCO" is responsible for assisting the Company in complying with legal and regulatory requirements. When there is vagueness or conflict in this Policy, the authority to interpret this regulation rests with the CCO.

1.4 Compliance with Local Legislation

All requirements in this Policy must also comply with applicable laws, regulations, and local industry codes of each country. In case of any conflict, the more stringent requirements shall prevail. However, each Celltrion Local Entity may follow a more alleviated local code of practices enacted by a major pharmaceutical association in the country in lieu of this Policy, provided that the Celltrion Local Entity is affiliated with such association. Application of an alleviated requirement shall be approved in advance by the Chief Compliance Officer of the Company.

Article 2. Promotion

2.1 Promotional Material

2.1.1 Consistency of Product Information

Promotional Material should be consistent with approved product information under national laws and regulations of each country, dictating the format and content of the product information communicated on labelling, packaging, leaflets, datasheets, and in all Promotional Material.

2.1.2 Accuracy

Promotional Material should be clear, legible, accurate, balanced, fair, and sufficiently complete to enable the recipient to form his or her own opinion of the therapeutic value of the pharmaceutical product concerned. Promotional Material should be based on an up-to-date evaluation of all relevant evidence and reflect that evidence clearly.

2.1.3 Not Misleading

Promotional Material should not mislead by distortion, exaggeration, undue emphasis, omission or in any other way. The Company should make every effort to avoid ambiguity. Absolute or all-embracing claims should be used with caution and only with adequate qualification and substantiation such as clinically proven data. Descriptions such as "safe" and "no side effects" should generally be avoided and should always be adequately qualified.

2.2 Non-Promotional Material

Non-promotional Material shall be:

- Medically and scientifically rigorous;
- Objective, accurate, unbiased;
- Provided with fair balance, and is truthful and complete without material omissions of

relevant information;

- Scientific in tone and free of promotional messaging;
- Provided by appropriate the Company personnel or by HCPs selected to present on the Company's behalf.

2.3 Procedural Setup

All promotional and non-promotional information must be reviewed and approved according to applicable requirements and material review procedure(s). Each Celltrion Local Entity is required to establish and maintain appropriate procedures to ensure compliance with relevant codes and applicable laws and to review and monitor all of their activities and materials in that regard.

2.4 Promotional Information at International Events

Promotional information which appears on exhibition stands or is distributed to participants at international scientific congresses and symposia may refer to pharmaceutical products which are not registered in the country where the event takes place, or which are registered under different conditions, provided that the following conditions are observed:

- Host country regulations should permit such an arrangement;
- The meeting should be a truly international, scientific event with a significant proportion of the speakers and attendees from countries other than the Host Country;
- Promotional Material (excluding Promotional Aids as described under Article 3) for a pharmaceutical product not registered in the country of the event should be accompanied by a suitable statement indicating the countries in which the product is registered and make clear that such product is not available locally;
- Promotional Material which refers to the prescribing information (indications, warnings, etc.) authorized in a country or countries other than that in which the event takes place but where the product is also registered, should be accompanied by an explanatory statement indicating that registration conditions differ internationally; and
- An explanatory statement should identify the countries in which the product is registered and make it clear that it is not available locally.

Article 3. Interaction with Healthcare Professionals (HCPs)

3.1 No Reward Principle

The Company prohibits the offering or giving of Anything of Value to HCPs in return for or as a reward for any explicit or implicit agreement or understanding that the HCP will use, purchase, order, recommend, or prescribe a Company product or product in development, or to otherwise secure an improper or unfair advantage for the Company.

3.2 Events and Meetings

The Company may organize promotional or non-promotional meetings and events in order to achieve a legitimate scientific, educational, promotional or business purpose, which must be identified and documented in advance of the meetings and events.

The purpose and focus of all symposia, congresses and other promotional, scientific or professional meetings (an "event") for HCPs organized or sponsored by the Company should be to provide scientific or educational information and/or inform HCPs about products.

3.3 Sponsorships of Third Party Conferences, Congresses and Other Meetings

3.3.1 The Company may provide Sponsorship for conferences, congresses, and other meetings where the Third Party has control over the arrangements, location, agenda, program content and selection of HCPs providing services.

3.3.2 All third-party conferences, congresses other meetings sponsored by the Company must have a legitimate scientific and educational purpose and must be relevant to the Company therapeutic or strategic areas of interest. The content of the event must be relevant to both the daily practice of the HCP and the Company's therapeutic or strategic areas of interest.

3.3.3 The Company may provide Sponsorship only to Third Party conferences, congresses and other meetings organized by reputable Third Parties that are recognized to be legitimate organizations and, if applicable, registered with a competent authority.

3.3.4 Sponsorship arrangements must be documented in a written agreement and include only items relevant to the program.

3.3.5 The Company products may be promoted at exhibits and booths and using

displays at the Third Party congresses and conferences.

3.3.6 Sponsorship to HCPs is limited to the payment of travel, meals, accommodation, and registration fees. And funding must be provided directly to the third-Party organizer.

3.3.7 No payment shall be made to compensate HCPs for time spent in attending an event.

3.3.8 Any sponsorship provided to individual HCPs must not be conditional upon an obligation to prescribe, recommend, purchase, supply, administer or promote any pharmaceutical product.

3.4 Guidance on Values

The Company may follow the guidelines of each country's pharmaceutical association with respect to value. The Company shall provide guidance using local currency, on acceptable monetary amounts for the following:

- "minimal value" for promotional aid items;
- "modest value" for items of Medical Utility and informational & Educational Items;
- "reasonable value" for scientific books & journal subscriptions.

3.5 Hospitality

Refreshments and/or meals incidental to the main purpose of the event may be provided to HCPs, as per local hospitality limits, as long as they are:

- Secondary to a clinical, scientific, educational presentation or other business- related discussion;
- Consumed only by those participating in the discussion and with a Company employee present;
- Provided in a venue and manner conducive to the exchange of scientific information;
- Not paid for or supplemented by the personal funds of a Company employee;
- Documented as to cost, and where possible, supported by itemized receipts; and
- Occasional in occurrence and modest in value, as per local standards.

3.6 Travel

Necessary travel expenses will only be paid for or reimbursed to HCPs who have a legitimate business purpose for attending a meeting or event. Class of travel shall be determined by the requirements of the Home Country of the HCP.

3.7 Accommodation

Accommodation is limited to 4-star hotels approved by the Company except in exceptional cases when nearby hotels are fully booked due to huge events. Hotels that are renowned for their entertainment, leisure or resort facilities should not be chosen.

3.8 Venue

The venue must be conducive to the exchange of scientific, educational, or business information, with meeting room facilities appropriate for the objectives and purpose of the meeting or event. Lavish or extravagant venues, venues in cities or locations with an economy based primarily on tourism or with a reputation as a resort location and venues known for their entertainment facilities must be avoided even if the cost is low compared to other venues.

3.9 Entertainment

The Company must not provide or pay for entertainment or other leisure or social activities, such as tours, concerts, theater, sporting events, or similar activities to HCPs.

3.10 Guests

The Company must not pay any costs associated with spouses, family members or guests accompanying invited HCPs for the Company-organized meetings and events or third-party conferences and congresses, except in cases of medical necessity.

3.11 Continuing Medical Education (CME)

3.11.1 The Company may support CME programs intended to provide HCPs with additional medical education to gain a better understanding of a specific therapeutic area, available treatment approaches or disease state.

3.11.2 CME material must be fair, balanced and objective, and designed to allow the expression of diverse theories and recognized opinions. Content must consist of medical, scientific, or other information that can contribute to enhancing patient

care.

3.11.3 The Company may not pay HCPs for their attendance or for time spent at the Third Party conferences, congresses, and other meetings. HCPs who are engaged to provide services at the event, such as delivering a scientific presentation for the Company, may be compensated accordingly.

3.11.4 The Company must not directly or indirectly influence or control the content of medical education programs.

3.12 Items other than Gifts

3.12.1 Medical Utility

3.12.1.1 The Company may offer or provide items of Medical Utility to HCPs if such items are of modest value, do not offset routine business practices, and are beneficial to enhancing the provision of medical services and patient care. Medical utilities should not be offered on more than an occasional basis, even if each individual item is appropriate.

3.12.1.2 Items of Medical Utility may include the Company name, but must not be product branded, unless the product's name is essential for the correct use of the item by the patient or required by local law, regulation, or industry code.

3.12.2 Educational Items

3.12.2.1 The Company may provide informational or Educational Items to HCPs for their education or for the education of patients on disease and its treatments provided that the items are primarily for educational purposes. These items must not have a use independent of the Item's educational purpose.

3.12.2.2 These informational and Educational Items can include the company name, but must not be product branded, unless the product's name is essential for the correct use of the item by the patient.

3.12.3 Promotional Aids

Promotional Aids of minimal value and quantity may be provided or offered to HCPs solely for the promotion of over-the-counter medicines if relevant to the

practice of the HCP. Providing or offering them to HCPs in relation to the promotion of prescription only medicines is prohibited.

3.12.4 Reminder Advertisement

A reminder advertisement is defined as a short advertisement containing no more than the name of the product and a simple statement of indications to designate the therapeutic category of the product. Requirements for reminder advertisements may vary from country to country, so it is necessary to check local laws and regulations.

Article 4. Gifts

4.1 Gifts for personal benefit (such as sporting or entertainment tickets, electronics items, social courtesy gifts, etc.) of HCPs (either directly or through clinics and institutions) are prohibited regardless of the occasion.

4.2 Providing or offering cash, cash equivalents or personal services is also prohibited. For these purposes, personal services are any type of service that confers a personal benefit to the HCP.

Article 5. Engagement with HCPs for Services

5.1 The Company may engage with HCPs as consultants, advisors for services such as speaking at and/or chairing meetings and events, involvement in medical/scientific studies, clinical trials or training services, participation at advisory board meetings, and participation in Market Research where such participation involves remuneration. The arrangements which cover these genuine consultancies or other similar services must, to the extent relevant to the particular arrangement, fulfill all the following criteria:

- written contract or agreement must be agreed in advance of the commencement of the services which specifies the nature of the services to be provided and the basis for payment of those services;
- legitimate need for the services must be clearly identified and documented in advance;
- criteria for selecting consultants must be directly related to the identified need and the

consultants must have the expertise necessary to provide the service;

- number of consultants retained must not be greater than the number reasonably necessary to achieve the identified need;
- hiring of the consultant to provide the relevant service must not be an inducement to prescribe, recommend, purchase, supply, and/or administer any medicine; and
- compensation for the services must be reasonable and reflect Fair Market Value.

5.2 The compensation arrangement may include reimbursement of reasonable expenses including travel, meals, and accommodation.

Article 6. Donations and Grants

6.1 Donations and Grants (in cash or in kind or otherwise) to HCOs and/or Patient Organizations ("PO") are only allowed if all the following criteria are met:

- they are made for the purpose of supporting healthcare, research or education;
- they are documented and kept on record by the donor/grantor; and
- they do not constitute an inducement to recommend and/or prescribe, purchase, supply, sell or administer specific medicinal products.

6.2 Donations and Grants to individuals are not permitted.

Article 7. Samples

7.1 Proper Use

The Company may supply free Samples of a pharmaceutical product to HCPs authorized to prescribe that product in order to enhance patient care in accordance with local laws and regulations.

7.2 Written Request

The Company may only provide Samples to prescribing HCPs, upon receipt of a signed and

dated written request from the HCP.

7.3 Packaging and Identification

The statement "Sample," "Not for Sale," or similar language, must be marked on at least one surface of the outer and, where possible, on the inner package of Samples if required by local policy or regulation. Samples must be labeled with all directions required for safe and effective use.

7.4 No External Compensation

HCPs receiving Samples must commit not to charge the Third Party programs, payers or patients for the distribution or use of Samples.

7.5 Pre-Approval Provision of Samples

The Company shall not provide Samples for use in a specific country until the required marketing authorization for such use has been obtained in that country.

7.6 Tracking and Monitoring

The Company, and all Third Party vendors involved in distribution of Samples on behalf of the Company, must maintain adequate systems of control and accountability for the production, importation and distribution of Samples.

Article 8. Clinical Trial and Market Research

8.1 Sponsor Initiated Trial ("SIT")

Sponsor Initiated Trial ("SIT") refers to all phases of research activities (pre-clinical, Phases I-IV, non-interventional studies, post-marketing clinical studies, Outcomes Research, and other real-world evidence studies) conducted by the Research & Development (R&D) or Medical Affairs function of the Company. Such research activities shall not be used as a means to promote the Company products or to reward HCPs or HCOs for past, present, or future business.

8.1.1 Written Agreement

Each research activity requires a written agreement, executed prior to the initiation

of the research activity.

8.1.2 Selection of HCP Investigators

The Company shall select Investigators based upon their qualifications, training, research or clinical expertise in relevant fields, the potential to recruit subjects and the ability to perform the research in compliance with applicable ethical, legal and regulatory requirements.

8.1.3 Payment

Payments must reflect the principle of Fair Market Value and must not be conditioned on the outcome of the study or study results. Research payments must not be used to:

8.1.3.1 Pay for non-study related costs such as capital expenses (e.g., computers or durable equipment or construction costs to build new facilities). In some cases, however, the Company may provide financial support to enable a study site to lease necessary equipment for the sole use and duration of the study;

8.1.3.2 Reward a high prescriber or organization;

8.1.3.3 Gain political favor;

8.1.3.4 Influence prescribing decisions or to disguise a rebate or discount; or

8.1.3.5 Offer an opportunity for an HCP to try or evaluate a product to encourage future sales.

8.2 Investigator-Initiated Trial ("IIT")

The Company must not seek to control any aspect of an Investigator-Initiated Trial ("IIT"). Submissions of IIT shall be approved by Medical Affairs or other R&D function of the Company based on research merit.

8.3 Payments in Connection with IIT

Funding must be supported by a detailed budget and used solely for the purposes of

conducting the IIT.

8.4 Review and Approval of IIT

Medical Affairs or other R&D function shall lead the team responsible for the review and approval of IIT. Such research activities shall not be used as a means to promote the Company products or to reward HCPs or HCOs for past, present, or future business.

8.5 Collaborative Research

The Company may participate in collaborative research in which the research activity is conceived and designed by the Company R&D or Medical Affairs in collaboration with a qualified Investigator. The Company's contributions to the collaborative research must be balanced with the benefits that the Company receives from the research.

8.6 Preceptorship Programs

The Company may engage Healthcare Organizations and their staff to train groups of the Company employees on disease state, clinical procedures, and treatment. No payment or benefit may be provided to HCP in exchange for the Preceptorship; payment may only be made to the HCO.

8.7 Market Research

The Company may conduct Market Research to obtain qualitative or quantitative data on the market environment to address a legitimate business need. Where Market Research is carried out by a Third Party on behalf of the Company, the Third Party may have to disclose to the applicable industry code authority or health authority that the research has been commissioned by the Company.

Article 9. Interactions with Patient Organizations (POs)

9.1 Scope

All interactions with patient organizations ("Pos") must be ethical based on mutual respect, with the views and decisions of each partner having equal value. The independence of POs, in terms of their judgement, policies and activities, must be assured. The Company must not

request, nor shall POs undertake, the Promotion of a particular product of the Company.

9.2 Declaration of Involvement

When working with POs, the Company must ensure that the involvement of the Company and the nature of that involvement is clear from the outset. The Company shall not require that it be the sole funder of the PO or any of its programs.

9.3 Written Documentation

Any Celltrion Local Entity of the Company that provides financial support or in-kind contribution to POs must have in place written documentation setting out the nature of support, including the purpose of activity and its funding.

9.4 Events

9.4.1 The Company may provide financial support for PO meetings provided that the primary purpose of the meeting is professional, educational, and scientific in nature, or otherwise supports the mission of the PO.

9.4.2 When the Company holds meetings for POs, the Company must ensure that the venue and location is appropriate and conducive to informational communication. In addition, any meals or refreshments provided by the Company must be modest as judged by local standards.

Article 10. Disclosure of Transfer of Values (ToVs)

10.1 Each Celltrion Local Entity shall disclose Transfer of Values ("ToVs") to HCPs and other stakeholders pursuant to the applicable national law and regulation of each country. The requirements of ToVs including but not limited to, contents of the ToVs, time and form of a report, and exceptions may vary based on which they are set forth in the applicable national law and regulation of each country.

10.2 It is understood that if there is any inconsistency between this Article and the applicable law or regulation to which an Celltrion Local Entity is a subject that would make adherence to this Article not reasonably possible, the Celltrion Local Entity must comply with such law or regulation.