

With Integrity and Passion

Our Code of Conduct



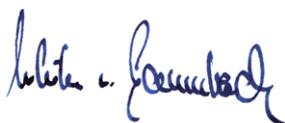
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Dear Colleagues,

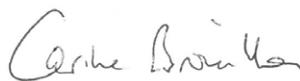
Our FOCUS articulates who we are, how we work and what we want to achieve. The Core of the Leitbild, the “who we are”, states that we aim to be driven by results, working with integrity and passion. The “how we work” helps us to achieve our Ambition 2025.

Our Code of Conduct demonstrates for each and every one that integrity is “part of our DNA”. We act in a global environment, and are all entrusted to make decisions that impact our reputation and relationships with each other, our customers, our business partners and the public. Our Code of Conduct is the guide for our actions and behavior both within the company and externally. We comply with the laws and are guided by our ethical principles as we conduct business at Boehringer Ingelheim.

We, the Board of Managing Directors are fully committed to compliance with the law and these ethical principles, and ask for your commitment.



Hubertus v. Baumbach



Carinne Brouillon



Michel Pairet



Jean Scheftsik de Szolnok



Michael Schmelmer

”



The Core of our Leitbild: Who we are

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

- ✓ We are driven by desire to serve mankind 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

Each of us is accountable

While laws, policies, and procedures may vary by country or region, the ethical principles of Boehringer Ingelheim do not.

All Boehringer Ingelheim employees must comply with this Code of Conduct and the policies, procedures and laws that apply to our particular geographies and jobs. We must also ensure that third parties performing work on the Company's behalf (such as consultants, contract workers, agencies etc.) understand and adhere to this Code of Conduct and any applicable policies, procedures and laws.

Each of us has a voice

It might happen that you become aware of an action or behavior which is, or could be perceived to be, not in line with our commitment, such as wrongdoing, misbehavior, doubtful practices, or deviation from this Code of Conduct. In such situations you are encouraged to "speak up" to one of these resources or use the "*Speak Up*" portal to report your concern.

Each of us has help

To support Boehringer Ingelheim's commitment to delivering results with Integrity and Passion, we maintain an Ethics and Compliance Program with the Code of Conduct at its foundation.

If you are unsure of what to do in a situation, it's always a good idea to start with your manager, but if you aren't comfortable doing so or this option isn't available to you the Ethics and Compliance Program provides training links to reporting channels and more information:

- Global Ethics & Compliance Website
- Speak Up Portal
- Ethics & Compliance Policy
- Speak Up Policy



Our Ethical Principles

With Integrity and Passion: Business Principles

01

Patient Safety and Pharmacovigilance

Ensuring a positive benefit-risk balance of our products is of critical importance to us. We monitor our products to ensure the level of quality and safety expected by our customers and regulators worldwide.

My Commitment

I foster a culture that is committed to patient safety and compliance with pharmacovigilance regulations worldwide, and I report any adverse event and pharmacovigilance-relevant information to my local Patient Safety & Pharmacovigilance Department.

More information

- Patient Safety & Pharmacovigilance Policy
- Applicable local standards

02

Quality

We consider quality, including all its integral compliance aspects, as indispensable in researching, developing and providing safe and efficacious products for our patients.

My Commitment

I foster a culture that is passionately committed to quality and compliance as success factors for our Company and I report any product complaints to my local Department that handles them.

More information

- Quality Policy
- Policy on Supply Chain Integrity
- Applicable local standards

03

Research and Development

In all our Research & Development activities, we strive to ensure the rights, safety and well-being of all participants and accuracy of our information. We are committed to the principles of Good Clinical Practice.

My Commitment

I take appropriate actions to ensure the appropriate and responsible use of human biospecimens as well as the welfare of our laboratory animals, and I practice responsible animal care and use.

More information

- Animal Welfare Policy
- Human Biospecimens and Associated Data Policy
- Declaration of Helsinki
- Applicable local standards

04

Interactions with Customers and Stakeholders

We provide accurate, fair and balanced information about our products, and do not engage in activities that inappropriately benefit or influence our customers or stakeholders. We strictly follow applicable transparency and disclosure standards required by law, regulations and codes of practice.

My Commitment

I ethically engage with customers and stakeholders and abide by the laws, codes and practices governing those relationships.

More information

- Interactions with Customers and Stakeholders Policy
- IFPMA Code of Practice
- Applicable local standards



05

Social Media and Public Relations

We at Boehringer Ingelheim continuously work hard to grow a reputation of integrity and trust. Media representatives and other stakeholders outside our Company depend on and expect us to provide consistent, accurate and responsible communications, which we are committed delivering.

My Commitment

I refer requests from journalists and other stakeholders outside the Company directly to the local Boehringer Ingelheim representative responsible for external communications, and I am aware of and abide by any Social Media Guidelines.

More information

- Social Media Guidelines
 - Applicable local standards
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06

Prevention of Bribery and Corruption

We do not promise, offer, pay, ask for or accept anything of value or benefit that may improperly influence decisions or actions with respect to our business operations.

My Commitment

I avoid any and all activities that create actual or perceived inappropriate influence, either directly or indirectly, through third parties.

More information

- Anti-Bribery/Anti-Corruption Policy
 - Applicable local standards
-

07

Purchasing and Supplier Relations

Recognizing that our suppliers and partners play an important role in our success, we engage only with partners that are appropriately selected and contracted, and who share our commitment to quality, service, sustainability, diversity and ethical business practices.

My Commitment

I conduct due diligence to ensure that I engage only reputable and qualified partners, and make sure appropriate contracts are in place.

More information

- Supplier Code of Conduct
 - Purchasing Policy
 - Applicable local standards
-

08

Antitrust and Fair Competition

We compete with ambition in the marketplace and do so honestly, fairly and in accordance with all applicable antitrust and unfair competition laws.

My Commitment

I avoid any activity that creates an actual or perceived impression of conspiring with a competitor or otherwise inappropriately restraining fair competition.

More information

- Antitrust Policy
 - Applicable local standards
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09

Export Control & Trade

We adhere to applicable export control and trade laws and other efforts intended to promote peace, stability and human rights, including regulations from the United Nations.

My Commitment

I ensure that every transfer of items (goods, software, technology and related services) is reviewed carefully against existing export control and trade regulations and that all resulting obligations are fulfilled.

More information

- Export Control and Trade Policy
 - Applicable local standards
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Insider Trading

We are committed to the fair functioning of the world's financial markets and prohibit employees from sharing inside information relating to Boehringer Ingelheim's stock-listed business partners, from trading on the basis of inside information or sharing "tips" that could unfairly influence investment decisions.

My Commitment

I am cautious when I have access to material information relating to Boehringer Ingelheim's stock-listed business partners. I do not disclose such inside information to anyone outside the defined project team and I do not trade or tip on inside information.

More information

- Insider Trading Policy
 - Applicable local standards
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With Integrity and Passion: Workplace Principles

11

Fair Treatment, Anti-Discrimination, and Inclusion

We treat each other with fairness and dignity at all times, and stand firmly against any form of discrimination or harassment. We respect and value the diverse individual characteristics, the different perspectives and distinctive backgrounds of our people. We uphold human rights and international labor standards around the globe.

My Commitment

I respect my colleagues' differences, and neither practice nor tolerate any form of discrimination, harassment, workplace aggression or gender inequality.

More information

- UN Global Compact
 - Applicable local standards
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Conflicts of Interest

We conduct business in a manner that ensures that decisions and business judgment are made with objectivity and free of undue personal interests.

My Commitment

I act at all times in the best interest of the company and avoid or disclose situations that present an actual or perceived conflict between my personal interests and the interests of Boehringer Ingelheim.

More information

- Anti-Bribery/Anti-Corruption Policy
 - Applicable local standards
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Data Protection

We respect the privacy rights of our employees, patients, physicians and other data subjects. We handle personal data only to the extent that we have a specific, definable business need for the information and then in compliance with all applicable laws and regulations.

My Commitment

I protect others' privacy by only using their personal data in a lawful, fair and transparent manner.

More information

- Applicable local standards
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Responsible Handling of Information

Information is one of our most valuable assets, and we protect and manage it with care. We maintain confidentiality, and obtain, enforce and defend our intellectual property rights.

My Commitment

I will not disclose Boehringer Ingelheim or partner confidential information and am cautious and take appropriate safeguards when handling company information in public places. I use manage, protect and retain company records appropriately.

More information

- Information Protection Policy
 - Applicable local standards
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Respect for Environment, Health, Safety and Sustainability

In all our activities we protect our employees, facilities and the environment from harmful influences, conserve natural resources and biodiversity, and promote environmental awareness. We select partners who share this commitment as well as the United Nations Sustainable Development Goals.

My Commitment

I am committed to good environment, health and safety practices at all times. If I experience or come across a safety or environmental hazard in my workplace, I report it to the responsible function.

More information

- Environment, Health, Safety & Sustainability Policy
 - Applicable local standards
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Political Activities

We respect and support individuals' rights to participate in political activities using their own resources and done on their own time.

My Commitment

I will not engage in activities that support political parties or candidates on behalf of Boehringer Ingelheim. I also do not make political contributions on behalf of Boehringer Ingelheim. When engaging in personal political activities, I avoid creating the impression that I am acting or speaking on behalf of the company.

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Human Rights

We are committed to respecting and contributing to the realization of all human rights. We continuously advance our understanding of human rights and assess the impact of our business activities, including impact that we may cause and any to which we may contribute. We take remedial measures as required, including by using leverage in our business relationships.

My Commitment

If I become aware of any potential impact to human rights caused by or connected to our business activities, I take remedial measures within my control and raise my concern to the appropriate department or to the “*Speak Up*” line.

More information

- Human Rights Policy
 - Applicable local standards
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Speak Up

We take all reports of potential non-compliance seriously and conduct objective, thorough and timely investigations when necessary. Retaliation against employees who in good faith speak up and voice concerns is strictly prohibited. Speaking up helps Boehringer Ingelheim take action and resolve issues appropriately.

My Commitment

I report potential non-compliance with law, this Code of Conduct, policies or procedures to one of Boehringer Ingelheim's available reporting channels. If a concern is brought to my attention, I listen and act by being receptive to the information, respecting confidentiality, emphasizing non-retaliation, and referring the matter to the proper channel for further handling. I have the duty to cooperate in an internal investigation.

More information

- Speak Up Policy
- Applicable local standards
- Enter “speakup” in our intranet.

When in doubt, ask yourself:

No document can cover every situation that you may encounter or every policy that may apply to you and your work. And it is not a substitute for good judgment.

There are times when you may be unsure what to do, or there are some issues that may not be immediately apparent or clear. In these situations, refer to the Ethics and Compliance resources and before making a decision or taking an action, ask yourself the following questions:

When in doubt, ask yourself:

- Is it legal?
- Does it comply with this Code of Conduct and company policies?
- Would I feel comfortable if it was made public?
- Does it feel right?

If you truthfully answer “yes” to all these questions, you do not need to be in doubt.

If you have to answer “no” to any of these questions or if you are not sure, please consult with your manager.

For the full text of all our policies and procedures, please visit [Global Compliance](#).

