

CODE OF CONDUCT

This Code of Conduct establishes the ethical standards and guidelines to be followed by all stakeholders of Gufic Biosciences Limited ("Gufic" or "Company"). These stakeholders include employees, contractors, suppliers, customers, shareholders, Communities and any other individuals or entities associated with the Company. The purpose of this Code is to foster a culture of integrity, transparency, and responsible behaviour in all business activities. It is expected that all stakeholders adhere to the principles outlined below:

1. Compliance with Laws and Regulations:

All stakeholders must comply with applicable laws, regulations, and standards. They should also adhere to the Company's internal policies and procedures.

2. Ethical Conduct:

All stakeholders are expected to conduct themselves with honesty, integrity, and fairness. They should avoid conflicts of interest and disclose any potential conflicts promptly. Unethical practices such as bribery, corruption, fraud, or any other illegal activities are strictly prohibited.

3. Confidentiality and Data Protection:

Stakeholders must respect the confidentiality of sensitive information and intellectual property belonging to the company, its clients, and partners. Personal data of employees, customers, and other stakeholders should be handled and protected in accordance with applicable privacy laws.

4. Respect and Diversity:

All stakeholders should treat each other with respect, dignity, and fairness, regardless of their race, ethnicity, gender, religion, age, disability, or any other characteristic. Discrimination, harassment, or any form of abusive behavior will not be tolerated.

5. Health, Safety, and Environment:

The Company is committed to providing a safe and healthy working environment for its employees, contractors, and visitors. All stakeholders must comply with safety regulations, promote a culture of safety, and take necessary measures to protect the environment.

6. Conflict Resolution:



Stakeholders are encouraged to resolve conflicts through open and constructive dialogue. They should report any concerns or violations of this Code to the appropriate authority within the company, without fear of retaliation.

7. Fair Competition:

The Company and its stakeholders are committed to fair and open competition. They should not engage in anti-competitive practices, price-fixing, collusion, or abuse of market power.

8. Social Responsibility:

Stakeholders should contribute to the social and economic development of the communities in which the company operates. They should support philanthropic initiatives, respect human rights, and promote sustainable business practices.

9. Reporting and Accountability:

All stakeholders have a responsibility to report any violations or suspected breaches of this Code. The company will investigate such reports promptly and take appropriate actions, including disciplinary measures, if necessary.

10. Compliance and Enforcement:

The Company will monitor and enforce this Code of Conduct, providing training and guidance to stakeholders as necessary. Non-compliance with this Code may result in disciplinary action, including termination of employment or business relationship.

11. Data Privacy:

Safeguarding and preserving the confidentiality and proprietary nature of our information is a top priority, preventing unauthorized use or disclosure. Our confidential information plays a crucial role in maintaining our competitive edge, exploring new markets, and serving as valuable assets for future expansion. We hold the privacy of all individuals in high regard and comply with legal requirements to ensure the protection and security of personal data. Unless legally mandated, we do not disclose any individual's personal, medical, or financial information.

Stakeholders are required to adhere to the responsibilities outlined with regards to data policy, which include:

- a. Obtain proper authorization before accessing any confidential information or personal data belonging to individuals.
- b. Consult your ultimate superior authority before sharing any information that may be considered confidential.

- c. Refrain from disclosing the company's proprietary and confidential information to any prospective employer or external parties without proper authorization.
- d. Non-Disclosure Agreements shall be reviewed by the Legal and the same should be in line with the Company's Non-disclosure template Agreement.

Grievance Redressal Mechanism of All Stakeholders

a. Reporting Grievances:

All stakeholders are encouraged to promptly report any grievances or concerns they may have related to violations of the Code of Conduct. Grievances can be reported to designated authorities within the Company through established channels, such as human resources, ethics hotlines, or dedicated grievance redressal mechanisms.

b. Confidentiality and Non-Retaliation:

The company is committed to maintaining confidentiality and protecting the identity of individuals reporting grievances, to the extent permitted by law. Stakeholders who report grievances will be protected against any form of retaliation or adverse consequences for making a good faith report.

c. Timely Response and Investigation:

Upon receipt of a grievance report, the company will initiate a timely and impartial investigation. The investigation will be conducted by qualified personnel who are independent of the alleged misconduct. The company will ensure that investigations are carried out objectively, respecting the rights of all parties involved.

d. Fair and Transparent Process:

The grievance redressal process will be fair, transparent, and free from bias. The Company will provide regular updates to the concerned parties regarding the progress and outcome of the investigation, while maintaining confidentiality to the extent necessary.

e. Resolution and Remedial Actions:

If a grievance is found to be valid, appropriate remedial actions will be taken to address the issue and prevent its recurrence. The Company will take necessary steps to rectify any harm caused, which may include disciplinary actions against individuals involved in the misconduct.

f. Feedback and Appeals:



Stakeholders who have reported a grievance have the right to receive feedback on the action taken. If dissatisfied with the outcome, they may have the option to appeal the decision through an established appeals process, ensuring a fair review of the case.

COMMUNITY ENGAGEMENT:

Gufic continuously endeavours to make a positive difference in the lives of patients, customers, stakeholders, the community, and the environment as a whole. We actively engage with the community, honouring their rights and dignity.

Gufic's Corporate Social Responsibility (CSR) is executed with the same level of commitment and dedication as our daily business operations.

Conclusion:

Adhering to this Code of Conduct allows all stakeholders of the Company to actively contribute to its reputation, success, and sustainable growth. Maintaining ethical standards and embracing responsible practices are vital for ensuring the Company's long-term prosperity and the credibility of both the Company and its stakeholders.

AMENDMENT:

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification would be binding on the Directors/ Employees unless the same is notified to the Directors/ Employees.