

Global Responsible Marketing & Communications Policy.

v1.0

Opella.

Purpose.

This Policy establishes Opella’s global standards for responsible, ethical, and compliant marketing and communications, including educational ones. It applies to all consumer facing, stakeholder, and healthcare professional communications across all Opella brands, channels, and markets.

At Opella, our goal is to become the best fast-moving consumer healthcare (FMCH) company in and for the world. As a globally B Corp certified company and member of the World Federation of Advertisers (WFA), we are committed to protecting consumers reached by our marketing activities, and pursuing the highest responsible marketing standards, along with our peers, for our industry.

The Policy aligns with:

- Opella’s [Code of Conduct](#).
- B Corp Standards.
- Applicable local and international advertising and communications laws.
- The [International Chamber of Commerce \(ICC\) Advertising and Marketing Communications Code](#), which we support as a member of the World Federation of Advertisers (WFA).
- Opella’s Medical, Legal, and Regulatory (MLR) review process, which ensures all external communications are scientifically accurate, balanced, and compliant with applicable regulations.

Scope.

This Policy applies to all Opella employees, its business partners, suppliers, and other third parties representing the interests of Opella such as marketing agencies, spokespeople, influencers, online and offline media. They are all expected to uphold the principles and commitments outlined in this Policy to help ensure we deliver responsible marketing and communications.

This covers all Opella’s communications such as those intended to promote products or to inform consumers’ behavior, while also maintaining compliance with all local market laws and regulations. This includes, but is not limited to, owned, earned and paid channels, advertising (including generative AI created content), packaging, healthcare professionals’ educational materials, press relations, promotional events, and point-of-sale.

I. OUR COMMITMENTS.

A. Accuracy, Evidence and Transparency.

We commit to:

- Ensuring communication efforts are honest, respectful, and supported by credible, verifiable evidence, where relevant.
- Ensuring marketing content - including influencer created content - is clearly identifiable as marketing, with required disclosures that are visible, compliant, and unambiguous.

B. Scientific and Medical Integrity.

We commit to:

- Ensuring health-related claims are based on reliable and robust scientific evidence, including clinical or technical data, where required.
- Ensuring communications to healthcare professionals (HCPs) are accurate, balanced, and compliant with applicable regulations, including nonpromotional requirements when mandated by local or international law.

- Reviewing and approving all promotional, educational and other communication materials in accordance with applicable laws, regulations and internal processes.
- Promoting safe and responsible product use in our communications, where relevant.

C. Inclusion, Representation and Protection of Vulnerable Groups.

We commit to:

- Ensuring representation is respectful, inclusive, and free of stereotypes or discriminatory portrayals.
- Ensuring communications respect all individuals including vulnerable groups, children, older adults, or individuals with specific health conditions.
- Striving to ensure communications are accessible such as using appropriate language and improving readability.

D. Environmental and Social Responsibility in Claims.

We commit to:

- Ensuring communication reflects the true nature of Opella and Opella's products' impact, both positive and negative, where relevant.
- Ensuring environmental or social claims are accurate and clearly scoped.
- Avoiding general or ambiguous sustainability terms unless they meet regulatory definitions.
- Not tolerating and not knowingly contributing to greenwashing.
- Utilizing language that is understandable and relevant to the intended audience if possible.

E. Data Privacy, Digital Responsibility and Channel Standards.

We commit to:

- Protecting personal information and ensuring compliance with all relevant data protection laws, regulations and codes.
- Ensuring digital communications are designed for transparency, user permission, and control.
- To the extent possible, selecting channels that maintain brand safety and accessibility.

F. Partner, Vendor and Agency Due Diligence.

We commit to:

- Conducting due diligence on third parties (i.e. vendors / suppliers) which present a higher level of risk, before establishing any business relationship. This process assesses their capabilities, expertise, integrity, reputation, and alignment with our ethical expectations.
- Ensuring contractual agreements include expectations on compliance, data protection, ethical and compliant conduct, evidence-based claims, and regulatory requirements.
- Periodic monitoring of performance and taking corrective action when partners do not meet our standards.

G. Ethical Engagement with Media and Journalists.

We commit to:

- Ensuring responsible and transparent communications with media partners and journalists, in line with local regulations.
- Respecting freedom of speech and the independence of the media, in line with applicable laws and regulations.
- Ensuring press materials accurately reflect scientific rigor, approved claims, and validated study results, and do not exaggerate or misrepresent findings, where relevant.

II. OUR APPROACH.

Governance.

The approval and overall accountability for this Policy sits with Opella’s Chief Growth Officer.

These requirements must be adhered to by any function who creates, uses, and makes marketing and communications.

We will continue to evolve our implementation guidance based on the latest marketing tools and technologies such as influencers, content creators and generative AI, as needed.

All employees involved in marketing and communications must complete periodic training on this Policy and related standards.

Speak-Up Helpline.

Employees can raise concerns on violations or suspected violations of Opella’s Code of Conduct, policies and procedures with their managers, People & Culture (P&C), Ethics and Business Integrity (EBI) or via any other local channels available under applicable laws. Concerns by employees and third parties can also be reported via the [Speak Up Helpline](#) . It operates 24 hours a day, every day of the year. We ensure all investigations are conducted in accordance with the principles of confidentiality, impartiality, objectivity, proportionality, integrity, and fairness, and that every individual can speak up without fear of retaliation.

Non-Compliance.

We are committed to ensuring all our marketing communications are carried out responsibly and in accordance with applicable laws and regulations. Failure to comply with this Policy may result in any of the following:

- Withdrawal or amendment of materials.
- Employee disciplinary action.
- Contractual actions for external partners.
- Other remediation/enhancement action.

DOCUMENT HISTORY.

Version Number.	Version Application Date.	Description of changes.
1.0	30/06/2025	This is a new Policy.

Issued by.	Global Marketing & Communications (Growth Hub)
Reviewed by.	Global Sustainability, Global Corporate Communications, Legal, Regulatory, and Ethics & Business Integrity.
Approved by.	CEO
Diffusion.	Public and internally.