

---

# Supplier Code of Conduct

---

## 1. Purpose and scope

This Supplier Code of Conduct applies to all third party suppliers of the Acino Group (“all Acino Entities”) and covers the following services:

- All relevant 3<sup>rd</sup> parties and service providers
- Distributors, Traders, Wholesalers
- IT service providers
- Regulatory and business consultants
- Affiliate Merchants
- Franchisors
- Importers and exporters
- Independent crafts people
- Dropshippers

It is based upon the standards set by the United Nations Universal Declaration of Human Rights, the International Labour Organization, the Pharmaceutical Supply Chain Initiative and other international standards, in addition to the Acino Group Code of Conduct.

Acino’s commitment to society goes further than the products we deliver: it includes consideration of the environmental and social impacts of our activities across the supply chain. The purpose of this Supplier Code of Conduct is to ensure that all commitments to purchase goods and/or services be conducted in a manner consistent with Acino’s core values and its Code of Conduct. By understanding and complying with the standards of this Code and by replicating them further down their own supply chains, suppliers commit to conducting business in a responsible manner and continuously striving to improve their business practices.

## 2. Labour and human rights

- Freely chosen employment

Suppliers shall not use nor engage in any form of forced labour including compulsory labour, bonded labour, involuntary prison labour, slavery or human trafficking. Suppliers shall not require cash deposits for workers to secure employment nor retain identity papers of workers unless required to do so by local law. If this is the case, workers must have access to their papers at all times. Workers are free to resign from their jobs after reasonable notice.

- Child labour and young workers

Suppliers shall not use child labour, in compliance with the International Labour Organization's standards. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment and the age established for completing compulsory education.

- Fair treatment of employees

Suppliers provide a workplace free of harassment, sexual harassment, corporal punishment, torture, bullying, physical or verbal abuse or threat of any of the above. There shall be no incentive for workers to pay to avoid any such treatment.

- Non-discrimination and diversity

Suppliers ensure that no discrimination or harassment takes place before, during and after employment. Any kind of discrimination, regardless whether based on gender, nationality, race, colour of skin, religion, creed, age, ethnic background, civil status, pregnancy, genetic information, gender identity, sexual orientation, disabilities, membership in trade unions, political affiliation or violation of any other protected status, is strictly forbidden and will not be tolerated. Suppliers commit to providing fair and equal treatment of all workers and to building a diverse and inclusive work environment.

- Working hours, wages and benefits

Working hours are monitored and comply with local laws and international standards; breaks are granted in compliance with local laws. Suppliers communicate payment terms to workers clearly and in writing before employment begins. Wages comply with national wage laws, are fair and ensure adequate standards of living. Workers are paid regularly and in full and benefits and bonuses are paid on time. If part of the salary is paid in kind, such allowances shall be appropriate for the personal use and benefit of the worker and his family, and the value attributed to such allowances shall be fair and reasonable. Overtime work is voluntary and compensated in accordance with applicable law.

- Freedom of association

Suppliers respect the rights of workers to associate freely. Open communication regarding working conditions is encouraged and suppliers are committed to a constructive dialogue with workers. In accordance with local laws, workers have the right to form and join labour unions and/or work committees and to seek representation. Suppliers respect the rights of workers to raise issues and engage in collective bargaining; subsequent collective agreements are communicated to all workers in a language they can understand. Workers shall not face reprisal or discrimination for joining or declining to join labour unions or work committees.

### **3. Environment, health, safety and quality**

- Environment, health, safety and quality regulations

Acino expects suppliers to comply with all applicable regulations regarding environment, health, safety and quality. This includes but is not limited to REACH, TSCA, GHS and RoHS. All necessary permits, licenses and registrations are obtained, maintained and kept up-to-date.

- Dangerous goods and narcotics

Dangerous and hazardous goods, materials and substances, as well as narcotics, are handled, stored, imported and sold in accordance to relevant and applicable regulations.

- Product safety and hazard information

Suppliers provide workers with safety information concerning hazardous material and substances, as well as education on how to handle them and protect oneself from hazards. In case of legitimate need, the safety-relevant information is provided to Acino and other parties.

- Process safety

Suppliers shall maintain all production processes in accordance with applicable safety standards. They will identify, quantify and define the risk levels of hazards in all stages of the production process. For hazardous installations, risk analyses are conducted that take health and environmental consequences into account. Appropriate measures are implemented to mitigate risks and prevent incidents.

- Occupational Health and Safety

Suppliers put in place preventative measures, safe procedures and controls in order to mitigate health and safety risks in the workplace. In particular, systems and procedures are put in place to protect workers from exposure to chemical, biological and physical hazards. When exposure to hazards is unavoidable, appropriate personal protective equipment is provided to workers. Suppliers provide workers with safe and healthy work conditions, including clean drinking water, sanitation, ventilation and adequate lighting and temperature.

- Emergency response

Suppliers communicate safety information on identified workplace risks to workers and distribute emergency plans across the facilities. Suppliers have a crisis response organization in place and workers are trained to identify emergency situations and react accordingly.

- Waste and emissions

Suppliers put processes in place to ensure that all waste is managed, handled, stored, recycled and/or reused safely. Suppliers minimize the generation and disposal of waste, air emissions and wastewater discharges with potential adverse impacts on human health or the environment. Any of these activities is appropriately measured, managed and controlled before release into the environment and systems are put in place to prevent and mitigate accidental spills and diffusive releases to the environment.

- Resource conservation and sustainability

Suppliers use natural resources (i.e. raw materials, water and energy) in an efficient and sustainable way and strive to reduce power consumption and greenhouse gas emissions. For these purposes, suppliers actively develop and use climate-friendly products and processes and see to it that such processes are utilized all along their own supply chains. A special attention is paid to means of delivery and transportation, which are chosen with consideration to their negative impacts on the climate. Where applicable, suppliers substitute, recycle and reutilize materials.

- Security

Suppliers shall put systems and processes in place to establish good security practices across the production and supply chains. Suppliers make certain that the integrity of each shipment is ensured from its origin to its endpoint. Furthermore, measures are taken to ensure that Acino products, their raw materials, packaging and know-how stay in the legal supply chain and are not disclosed or made accessible to counterfeiters or third parties.

- Quality and GxP requirements

3<sup>rd</sup> parties and service providers must meet with Acino's, current local and international GxP requirements to assure GxP compliance and oversight. The Quality Management System of the 3<sup>rd</sup> party and service provider must extend to the control and review of any quality issues related to the production, testing, storage, distribution, import or export of medicinal products. Risk Management System must be in place at 3<sup>rd</sup> party and service provider to evaluate and mitigate product quality and GxP compliance related risks on a regular basis. Processes for change control, corrective and preventive actions, continual improvements shall be established through 3<sup>rd</sup> party and service provider Quality Management System. Duties of each party (defines in detail GMP/GDP responsibilities) must be determined through written agreements in order to avoid misunderstandings which could result in a product or operation of unsatisfactory quality, affect the integrity of the product, data or services.

#### **4. Ethics**

- **Business integrity**

No form of corruption shall be practiced or tolerated by Acino suppliers, be it in the shape of unlawful or unethical gifts, hospitality, donations, grants, sponsoring or any other unlawful incentives. Suppliers shall not practice or tolerate bribery of public officials or other businesses nor make facilitation payments. Political contributions may take place only in compliance with laws and standards and without expectations of direct return for the supplier or Acino. Lobbying may not be misused for corrupt or illegal purposes. Conflicts of interest

Acino expects suppliers to disclose actual or potential conflicts of interests. Suppliers shall not pursue any personal, social, financial, civic or charitable activities, in their own favor or in favor of their family members, friends and partners, which are contrary to Acino's interests or compromise suppliers' objectivity.

- **Fair competition**

Suppliers are expected to conduct their business in compliance with fair competition and anti-trust laws and regulations. Suppliers shall refrain from the use of unfair, deceptive, or dishonest business practices. Acino does not impose any unlawful or abusive competition terms and conditions upon any of its distributors, licensees or business partners and expects the same standard of behavior from its suppliers.

Advertising shall be accurate, fair, balanced, supported by scientific evidence and shall not be false or misleading.

- **Confidential reporting of concerns**

Suppliers shall provide a workplace environment in which employees feel safe and have the means to report concerns regarding unlawful or unethical activities or practices that they may notice. Such reports are treated confidentially, are investigated and, if needed, corrective action is taken by the suppliers.

- **Animal welfare**

Animal testing will be minimized and scientifically valid alternatives will be used whenever possible. If animal testing is used, suppliers handle animals in a way that avoids discomfort, distress or pain or reduces it to a minimum. Whenever possible, sedation, analgesia or anesthesia are utilized. Moreover, the handling of animals occurs by or under close supervision of qualified and trained personnel, with provision of adequate veterinary care. Special attention is paid to transportation, which is performed by qualified personnel using appropriate devices and facilities.

- Clinical trials

Clinical trials are conducted in adherence with international guidelines, national and local laws and regulations as well as the strictest medical, scientific and ethical principles.

- Conflict minerals

Suppliers ensure that the use of minerals or products containing metals derived from minerals originating from conflict regions is reduced and, where possible, eliminated.

- Trade Sanctions and Embargoes

Suppliers shall comply with all applicable laws and regulations regarding imports, and exports of goods, services and technical data, including without limitation customs regulations, export control, trade sanctions and embargoes. The terms "trade sanctions" and "embargoes" refer to laws and regulations imposed by countries – usually in furtherance of foreign affairs, national security, or human rights objectives – that restrict or even prohibit dealings in certain countries or regions, with certain products and services, in certain industry sectors and/or with targeted individuals or entities located, resident or organized in the given country or region, or with certain other targeted parties, e.g. the governments and authorities of such countries.

- Privacy and intellectual property

Suppliers shall not misappropriate or infringe valid intellectual property rights or confidential information of the company, workers, business partners and patients. To this end, all information, including personal data and confidential information, is safeguarded against accidental or unauthorized access, use, alteration, loss or destruction.

Personal data is disclosed or transferred to third parties only when legitimate grounds to do so have been established and reasonable and appropriate measures have been taken to ensure the adequate protection of that personal data, in compliance with applicable laws.

In case of data breach or suspected data breach concerning the goods or services provided to Acino, suppliers shall notify Acino as quickly as possible and assist Acino in investigating in response to the data breach.

## **5. Management systems**

- Legal and other requirements

Suppliers shall comply with all appropriate legal, regulatory and contractual requirements as well as generally recognized standards.

- Commitment and Accountability

Conformance to the standards set forth in this Supplier Code of Conduct is demonstrated by allocation of appropriate resources. Furthermore, relevant documentation (i.e. records of expenses, revenues, production and quality data related to business with Acino) is developed and maintained to attest compliance.

- Communication to supply chain

Suppliers commit to the principles defined in this document and communicate these principles to their supply chain.

- Training

Training is provided to employees and management to ensure that this Supplier Code of Conduct as well as relevant laws, regulations and contractual requirements are understood and applied.

- Risk management

Suppliers shall have mechanisms to identify, determine and manage risks in all areas defined and addressed in this Supplier Code of Conduct.

- Reporting

All incidents in the areas of occupational safety, hygiene, dangerous goods, narcotics or any other area relevant to the Acino Group or related to products ordered by the Acino Group must be reported to the Acino Global EHS Division immediately or within 24 hours under [ehs@acino.swiss](mailto:ehs@acino.swiss). Furthermore, the Global EHS Division of the Acino Group must be notified immediately if issues with authorities arise or in case of loss of permits or authorization or imminent threat thereof. All incidents in the areas of Human Rights and Ethics must be reported to the Acino Compliance department under [Compliance.Hotline@acino.swiss](mailto:Compliance.Hotline@acino.swiss).

- Continuous improvement

Continuous improvement is expected from suppliers in order to achieve and surpass the standards set forth by this Supplier Code of Conduct.

- Auditing

It is important to us to ensure that the principles of sustainable development be followed across our supply chain. You may recognize the above principles and demonstrate your commitment to them by incorporating these standards in your own Code of Conduct or company policy and complying with it. The Acino Group, and in particular the Global EHS Division, reserves the right to conduct audits or assessments to ensure that you comply with all applicable laws, rules and

standards, and to take appropriate action regarding the business relationship when there is cause for concern. The Acino Group retains the right to terminate any relationship if a supplier violates international principles, fails to take action to remedy such violations, or if systematic violations are identified.

## 6. References

### ▪ External resources

Universal Declaration of Human Rights

<http://www.un.org/Overview/rights.html>

Pharmaceutical Supply Chain Initiative

<http://www.pharmaceuticalsupplychain.org>

International Labour Standards (ILO)

<http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm.ilo.org>

International Convention on the Elimination of All Forms of Racial Discrimination (UNHRC)

<https://www.ohchr.org/en/professionalinterest/pages/cerd.aspx>

Convention on the Elimination of All Forms of Discrimination against Women (UNHRC)

<https://www.ohchr.org/en/professionalinterest/pages/cedaw.aspx>

Guiding Principles for Chemical Accident Prevention, Preparedness and Response (OECD)

<http://www.oecd.org/env/ehs/chemical-accidents/Guiding-principles-chemical-accident.pdf>

Declaration of Helsinki: Ethical Principles for Medical Research Involving Human Subjects (WMA)

<https://www.wma.net/wp-content/uploads/2018/07/DoH-Oct2008.pdf>

Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (OECD)

[www.oecd.org/daf/anti-bribery/ConvCombatBribery\\_ENG.pdf](http://www.oecd.org/daf/anti-bribery/ConvCombatBribery_ENG.pdf)

Guidelines for Multinational Enterprises (OECD)

<https://mneguidelines.oecd.org/guidelines/>



- **Acino resources**

Acino Group Code of Conduct

[https://acino.swiss/wp-content/uploads/2019/05/LR01\\_ACI\\_06\\_COM\\_18\\_003\\_Broschure\\_A5\\_Update2019\\_EN\\_WEB.pdf](https://acino.swiss/wp-content/uploads/2019/05/LR01_ACI_06_COM_18_003_Broschure_A5_Update2019_EN_WEB.pdf)

**Company Name:**

---

---

(Place)

(Date)

---

(Signature)

(Function within the company)