

Acino Supplier Code of Conduct

Version 2.0

The Acino Supplier Code of Conduct expresses the minimum standards in key areas of ethics, human rights, labour, health, safety, environment and related management systems to which we expect our Suppliers to commit in the context of their business relationship with Acino and throughout its term and any extension thereof.

Acino is a member of the Pharmaceutical Supply Chain Initiative (PSCI), a non-profit industry organization that brings together members to define, establish and promote responsible supply chain practices. This Acino Supplier Code of Conduct embeds the PSCI Principles and addresses its main areas: ethics, human rights and labour, health and safety, environment and related management systems.

Acino acknowledges both the United Nations Guiding Principles on Business and Human Rights (UNGPs) (“Ruggie Framework”) and the OECD Due Diligence Guidance for Responsible Business, and recognises the fundamental conventions of the International Labour Organization (ILO): elimination of forced and compulsory labour (Conventions 29 and 105), abolition of child labour (Conventions 138 and 182), elimination of discrimination in respect of employment and occupation (Conventions 100 and 111), freedom of association and collective bargaining (Conventions 87 and 98).

In cases where the Suppliers involve affiliated companies or permitted subcontractors in the provision of goods or services to Acino, Suppliers shall implement adequate procedures to ensure that such affiliates or subcontractors follow these minimum standards.

1. Ethics

Suppliers shall conduct their business ethically and act with integrity. The Ethics elements include:

1.1. ANTI-BRIBERY AND CORRUPTION

All forms of bribery, corruption, extortion, embezzlement, money-laundering, tax evasion, and terrorism financing, insider trading and market manipulation are prohibited and Supplier shall act in full compliance with related applicable laws. Suppliers shall not pay or accept bribes or participate in other illegal inducements or illegal payments in business or government relationships, either directly or through the use of intermediaries. Suppliers shall prohibit “facilitation” or “grease” payments, meaning payments to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement. Suppliers shall ensure they, its Affiliates and permitted subcontractors have adequate systems in place to prevent bribery and comply with applicable laws, money-laundering, tax evasion and terrorism financing.

1.2. SANCTIONS

Supplier shall perform its obligations to Acino in full compliance with the applicable Sanctions and shall obtain any necessary permits under applicable Sanctions. Supplier shall not do, or omit to do, anything that would cause Acino to be in breach of Sanctions. Supplier represents that it is neither classified as, nor controlled by, a Sanctioned Person.

The terms "Sanctions" refers to all applicable sanctions, embargoes, export and/or import controls and/or trade, economic or financial restrictive measures, laws and regulations, including, without limitations, any sectoral and/or territorial sanctions, or any other type of sanctions limitations, in each case as may be applicable to the Supplier and/or their Affiliates, permitted subcontractors, agents, representatives or other intermediaries involved in the performance of the relevant agreement. "Sanctioned Person" means an individual, entity, organization, its Affiliate/s, its representatives, its permitted subcontractors or its agents designated as a sanctioned person under Swiss, EU, UK and US law (e.g. such as a "Specially Designated National" or "blocked person") or any individual, entity or organization being included in the consolidated list of sanctioned parties or asset freeze targets designated under Swiss, EU, UK and US law.

1.3. FAIR COMPETITION

Suppliers shall conduct their business consistent with fair competition and in compliance with all applicable competition laws. Suppliers shall employ fair business practices including accurate and truthful advertising.

1.4. ANIMAL WELFARE

Animals shall be treated humanely with pain and stress minimized. Animal testing should be performed after consideration to replace animals, to reduce the numbers of animals used, or to refine procedures to minimize distress. Alternatives should be used wherever these are scientifically valid and acceptable to regulators.

1.5. DATA PROTECTION AND SECURITY

Suppliers shall establish and safeguard adequate personal data and security for the information they, and any third party acting on their behalf, process. Supplier shall make only proper use of confidential information to ensure that company, worker, patient, subject and donor privacy rights are protected. Suppliers shall comply with applicable privacy and data protection laws and ensure the protection, confidentiality, security and lawful processing of personal data.

Suppliers must establish an appropriate organizational framework, along with effective processes and protocols, to safeguard the confidentiality, integrity, and availability of personal data. This is to prevent any accidental or unauthorized instances of loss, damage, modification, disclosure, utilization, or unauthorized access. In case of an actual or suspected data breach Suppliers shall notify Acino immediately and assist Acino in investigating and responding to the data breach and/or any request from the data subjects or respective data protection authorities.

Suppliers shall maintain sufficient policies and procedures that focus on both technical and organizational security measures. They are also expected to take reasonable measures to stay updated and periodically verify their compliance with these protocols.

Supplier, when acting as a data processor, shall disclose or transfer personal data to third parties only with the prior written consent of Acino, 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. Suppliers must have adequate safeguards, rules and procedures to ensure that they remain in compliance with all applicable laws that govern cross-border data transmissions, where applicable.

1.6. CONFIDENTIALITY AND INTELLECTUAL PROPERTY

Suppliers shall not misappropriate or infringe valid intellectual property rights or confidential information of third parties, including Acino. To this end, all information shall be safeguarded against accidental or unauthorized access, use, alteration, loss or destruction.

1.7. PATIENT SAFETY AND ACCESS TO INFORMATION

Suppliers shall ensure that adequate management systems are in place to minimize the risk of adversely impacting on the rights of patients, subjects and donors, including their rights to health and to access information directly.

1.8. CONFLICTS OF INTEREST

Suppliers shall take reasonable care to avoid and manage conflicts of interest. Suppliers are expected to notify all affected parties if an actual or perceived conflict of interest arises.

1.9. CLINICAL TRIALS

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

2. Human Rights and Labor

Suppliers shall commit to uphold the human and employment rights of workers and to treat them with dignity and respect. This commitment includes:

2.1. FREELY CHOSEN EMPLOYMENT

Suppliers shall not use forced, bonded or indentured labor or involuntary prison labor. No worker shall pay for a job or be denied freedom of movement.

2.2. CHILD LABOR AND YOUNG WORKERS

Suppliers shall not use child labor. 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 or the age established for completing compulsory education.

2.3. NON-DISCRIMINATION

Suppliers shall provide a workplace free from discrimination. There shall be no discrimination for reasons such as race, color, age, pregnancy, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status.

2.4. FAIR TREATMENT

Suppliers shall provide a workplace free of harassment, harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers and no threat of any such treatment.

2.5. WAGES, BENEFITS AND WORKING HOURS

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Suppliers shall communicate with workers the basis on which they are being compensated in a timely manner. Suppliers are also expected to communicate with workers whether overtime is required and the wages to be paid for such overtime. Overtime shall be consistent with applicable laws and national and international standards.

2.6. FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING

Suppliers shall encourage open communication and direct engagement with workers to resolve workplace and compensation issues. Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils and participate in collective bargaining. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

3. Health and Safety

Suppliers shall provide a safe and healthy working environment, including - where applicable - for any company-provided living quarters. Health and Safety measures shall extend to contractors and subcontractors on supplier sites. The Health and Safety elements include:

3.1. WORKER PROTECTION

Suppliers shall protect workers from over-exposure to chemical, biological, physical hazards and physically demanding tasks in the workplace and in any company provided living quarters. Suppliers shall ensure appropriate housekeeping and provide workers with access to potable water.

3.2. PROCESS SAFETY

Suppliers shall have management processes in place to identify the risks from chemical and biological processes and to prevent or respond to catastrophic release of chemical or biological agents.

3.3. EMERGENCY PREPAREDNESS AND RESPONSE

Suppliers shall identify and assess emergency situations in the workplace and any company provided living quarters, and to minimize their impact by implementing emergency plans and response procedures.

3.4. HAZARD INFORMATION

Safety information relating to hazardous materials - including pharmaceutical compounds and pharmaceutical intermediate materials - shall be available to educate, train, and protect workers from hazards.

4. Environment

Suppliers shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment. Suppliers are encouraged to conserve natural resources, to avoid the use of hazardous materials where possible and to engage in activities that reuse and recycle. The Environmental elements include:

4.1. ENVIRONMENTAL AUTHORIZATIONS AND REPORTING

Suppliers shall comply with all applicable environmental regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained, and their operational and reporting requirements followed.

4.2. WASTE AND EMISSIONS

Suppliers shall have systems in place to ensure the safe handling, movement, storage, disposal, recycling, reuse, or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions with the potential to adversely impact human or environmental health shall be appropriately measured, managed, controlled and treated prior to release into the environment. This includes managing releases of active pharmaceuticals into the environment (PiE).

4.3. SPILLS AND RELEASES

Suppliers shall have systems in place to prevent and mitigate accidental spills and releases to the environment and adverse impacts on the local community.

4.4. RESOURCE USE

Suppliers shall take measures to improve efficiency and reduce the consumption of resources.

4.5. SUSTAINABLE SOURCING AND TRACEABILITY

Suppliers shall carry out due diligence on the source of critical raw materials to promote legal and sustainable sourcing.

4.6. GREENHOUSE GAS EMISSIONS

Suppliers are encouraged to quantify, disclose and take action to reduce greenhouse gas emissions and support their suppliers to do the same.

5. Management Systems

Suppliers shall use management systems to maintain business continuity, facilitate continual improvement and compliance with the expectations of this Code. The Management System elements include:

5.1. COMMITMENT AND ACCOUNTABILITY

Suppliers shall demonstrate commitment to the concepts described in this document by allocating appropriate resources and identifying senior responsible personnel.

5.2. LEGAL AND CUSTOMER REQUIREMENTS

Suppliers shall identify and comply with applicable laws, regulations, standards and relevant customer requirements.

5.3. RISK MANAGEMENT

Suppliers shall have mechanisms to determine and manage risks in all areas addressed by this Code.

5.4. DOCUMENTATION

Suppliers shall maintain documentation necessary to demonstrate conformance with this Code and compliance with applicable regulations.

5.5. TRAINING AND COMPETENCY

Suppliers shall have a training program that achieves an appropriate level of knowledge, skills and abilities in management and workers to address the expectations in this Code.

5.6. CONTINUAL IMPROVEMENT

Suppliers are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and management reviews.

5.7. IDENTIFICATION OF CONCERNS

All workers shall be encouraged to report concerns, illegal activities or breaches of the principles set forth in this Code in the workplace without threat of or actual reprisal, intimidation or harassment. Suppliers shall investigate and take corrective action if needed.

5.8. COMMUNICATION

Suppliers shall have effective systems to communicate the principles in this Code to workers, contractors and suppliers.

6. Effective Date

The Acino Supplier Code of Conduct version 2.0 shall be effective as of 1 November 2023 (the “**Effective Date**”).