



# SUPPLIER CODE OF CONDUCT

Clinigen Group plc

**RIGHT MEDICINE RIGHT PATIENT RIGHT TIME**



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# CODE OF CONDUCT

## Clinigen's commitment to an ethical supply chain

In order to deliver on our mission and provide access to critical medicines throughout the medicine lifecycle we must partner with a number of third-party suppliers. Clinigen's suppliers are an integral part of helping us to supply a high quality and ethical service for pharma clients, healthcare professionals and ultimately patients around the world. It is therefore critical we select suppliers that that adhere to high quality and ethical standards that both Clinigen our clients and our customers expect and require.

We expect our suppliers to demonstrate a culture and framework that reinforces ethical and lawful behaviours and ensures all aspects of its business comply with all applicable laws and regulations, both in the country in which the supplier operates, and in the country to which the service or products will be supplied.

We have developed this code of conduct for suppliers so that it is clear how we expect our suppliers to do business.

### Anti-bribery and corruption

At Clinigen, we have a zero-tolerance approach to bribery and other form of corrupt business behaviour.

We expect our suppliers likewise to have a zero-tolerance approach to bribery and corruption and to comply with applicable anti-bribery and anti-corruption laws and regulations and industry standards.

Our expectations of suppliers include the following:

- Suppliers must not bribe any person or organisation, whether private, public, or governmental, and suppliers shall not accept any bribes.
- No intermediaries, such as agents, advisers, distributors, or any other business partners, may be used to commit acts of bribery.
- No facilitation payments are permitted, irrespective of whether local law permits them.
- Gifts, hospitality, and entertainment should be modest, reasonable, and infrequent, so far as any individual recipient is concerned. They should never be offered or provided with the intent of causing the recipient to do something favouring the supplier and/or Clinigen or to refrain from doing something disadvantaging the supplier and/ or Clinigen. They must always comply with local law or codes of conduct.
- We expect suppliers to have policies or guidelines in place that define under which circumstances, or within what limits, employees can receive gifts or favours from external companies with whom the company does business.
- Any benefit given to a public official must fully transparent, properly documented, and accounted for, in accordance with all applicable laws.
- If a supplier chooses to make political contributions, they must be made in compliance with all applicable laws, regulations and industry codes and standards.
- Our suppliers must keep accurate and up to date books and records that document accurately and in reasonable detail all matters relating to the supplier's business with Clinigen, accounting for all payments made

and received and all other advantages given and received by it in connection with any agreements with Clinigen.

- Clinigen may audit the supplier at any time upon reasonable prior notice to ensure its compliance with these standards and to confirm all payments made by Clinigen and to third parties (unless otherwise prohibited).
- We expect our suppliers to work with their suppliers to ensure that they comply with the above expectations.

## Employment practices

Clinigen takes its responsibility to protect human rights very seriously. We expect our suppliers to uphold the human rights of workers and maintain a culture of dignity, respect, and equal opportunities.

## Modern slavery

As we are headquartered in the United Kingdom, we are subject to the Modern Slavery Act 2015, and are required to ensure that slavery and human trafficking is not taking place in our entire supply chain, even if it is outside of the UK.

We do not tolerate slavery or human trafficking in our supply chain. We will never knowingly deal with any organisation which is connected to slavery or human trafficking.

Suppliers must not use child labour in circumstances such that the tasks performed by any such child labour could be reasonably foreseen to cause physical or emotional impairment to the development of such child. 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.

Suppliers must not use forced labour of any kind, including prison, indentured, bonded, or enslaved labour. Acts of human trafficking are also prohibited. Suppliers are required to monitor any third party which assists them in recruiting or hiring employees, to ensure that people seeking employment at their facilities are not compelled to work through force, deception, intimidation, coercion or as a punishment for holding or expressing political views.

## Non-discrimination

Suppliers shall provide a workplace free of harassment and discrimination. Discrimination for reasons of race, colour, age, sexual orientation, ethnicity, political affiliation, marital status, religion, disability, or gender must not be tolerated.

## Fair treatment

Suppliers shall provide a workplace free from corporal punishment, mental, physical, sexual, or verbal abuse and must not use cruel or abusive disciplinary practices in the workplace.

## Wages, benefits and working hours

We expect our suppliers to pay each employee a fair wage and provide each employee with all legally mandated benefits. Suppliers must also comply with the laws on working hours and employment rights in the countries in which it operates.

## Freedom of association

We require our suppliers to be respectful of their employees' freedom of association and right to join and form independent trade unions.

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## Health and safety

We expect our suppliers to carry out business in an environmentally responsible manner and promote a safe and healthy workplace for all its employees, including for any company-provided living quarters and for those who work on their behalf worldwide.

Suppliers shall:

- protect workers from over exposure to chemical, biological and physical hazards, physically demanding tasks;
- have programmes in place to prevent or mitigate catastrophic releases of chemicals;
- identify and assess emergency situations, and minimize their impact by implementing emergency plans and response procedures; and;
- make available information relating to hazardous materials – including pharmaceutical compounds and pharmaceutical intermediate materials – to educate, train and protect workers from hazards.

## Environment

We require our suppliers to manage business activities in a way that, as far as practical, conserves and protects natural resources and minimises the generation of waste through avoidance, reuse and/or recycling, in compliance with applicable environmental laws and regulations.

## Animal welfare

Clinigen is committed to achieving high standards of animal welfare. Our suppliers must respect animal welfare and work progressively towards adopting healthy and humane practices towards animals. We have high ethical standards in our sourcing activities and decisions and consider ways to replace animals entirely by alternative means, reduce the numbers of animals used or refine procedures to minimise distress.