

**CLINIGEN**

# Code of Conduct



Welcome to  
the Code of  
Conduct

**At Clinigen, we are proud of our reputation** for conducting business in an honest, professional, and socially responsible way. Our Code of Conduct provides an ethical and behavioural framework on which we base our decisions. Living through our Code of Conduct, we bring our values and purpose to life, every day and in everything we do.



## **Our Purpose**

To be pathfinders for innovative medicines



## **Our Vision**

Access to medicine is global by design



## **Our Mission**

To accelerate access to medicines for patients in every corner of the globe



## **Our Values**

### **We Are Connected by Trust**

Trust is the foundation of our relationships and is the key to having meaningful connections with clients, partners, and colleagues. We're committed to building trust by being collaborative, inclusive, and transparent. We strive to create a culture where trust is a clear driver of our success.

### **We Are Change Makers**

Large parts of the world are under-served by standard pharmaceutical models, and we're here to change that. Being change makers means creating new opportunities for growth and progress in our workplaces, our industry, and in the services we provide. We're proactive in identifying new trends and ways of working. We take calculated risks and embrace new ideas.

### **We Find a Way**

We use our knowledge, expertise and global network to find the right path forward. We are resourceful and adaptable, able to overcome obstacles in order to get critical medicines to patients in need, no matter the circumstances. We challenge the status quo and push past our limits. We always strive to find a way.



“Our Code of Conduct embodies our purpose and our values, acting as our everyday ethical guide.”

# Making our mission a reality

**CLINIGEN**

**Clinigen exists to ensure innovative medicines can reach patients in every corner of the globe. We enable ethical access to life-saving medicines, licensed or unlicensed, whenever and wherever there is unmet medical need.**

Health is a fundamental human right. Yet there are glaring global disparities in access to medicines and effective healthcare. Through the work we do and the people we work with, we have the opportunity to build transparent and resilient supply chains, shorten access times for patients, and help healthcare professionals and pharmaceutical and biotech companies navigate new and uncharted territories.

There are over 1,000+ Clinigen employees across the world, all working hard to make our mission a reality. By maintaining a positive and inclusive workplace where representation matters, people are valued and diverse perspectives are listened to, everyone can benefit from our collective skills and potential.

As we build for the future, it is essential that we maintain the high standards we set for ourselves. Whether it's our technology, partner engagements, leadership and education of the wider industry, the way we treat our people, or the way we engage with Healthcare Professionals, we do what is right, not what is easy.

Our Code of Conduct embodies our purpose and our values, acting as our everyday ethical guide. It sets the aspiration for who we want to be as an employer, a partner, and a business: purpose-led and values-guided, with a patient-focused approach that influences everyone we work with.

We all have a personal responsibility to understand and model behaviour that complies with the Code. By following these high ethical standards, we demonstrate our commitment to acting in a socially responsible and sustainable way, no matter the situation. This is how we will build trust with customers, suppliers, communities, and each other, making decisions that improve the lives of patients and enhance our ability to be pathfinders for innovative medicines.

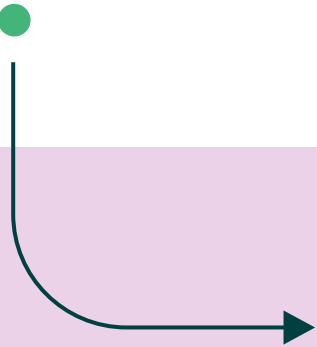
Thank you,  
**Jerome Charton**  
**CEO**

# Ethics in action: empowering you to do the right thing

Clinigen's Code of Conduct is designed to support everyday decision-making, reinforcing the values and standards that we are proud of as a business. However, there will be times when you are faced with situations where the right answer or action may not be obvious. While the Code can guide us, it cannot address every possible circumstance.

We always abide by all applicable laws and regulations, as well as our own policies and standards. If you are unsure of the right course of action, or are faced with a difficult issue, asking yourself the following questions may help you determine the appropriate course of action.

Remember: if you're ever in doubt, ask before you act. We want you to make the right decisions.



01

Am I being asked to do something which I think is wrong or against our values and purpose?

02

Are my actions legal and in compliance with the standards of our profession?

03

Have I consulted appropriately with colleagues?

04

Am I compromising my integrity or the integrity of Clinigen or our clients?

05

Am I upholding Clinigen's values?

06

Am I respecting the different perspectives and experiences of others?

07

Is my choice of action the most ethical among the possible alternatives and do I feel good about my choice?

08

Do I fully understand the ethical or legal implications of the decision I'm making?

09

Would my actions damage the reputation of Clinigen?

10

Could I defend my decision if it were to become known internally or publicly?

# Speak Up

How to report or raise your concerns about suspected violations of our Code of Conduct.

**When we encounter a situation** that either is, or may be perceived to be, unethical or unlawful, we have a responsibility to act. Full compliance with the Code of Conduct is essential to maintain our trusted reputation and commitment to the highest standards of integrity and quality.

If you need some guidance or wish to report a concern, you can contact:

- Your Line Manager;
- Your HR Representative;
- The VP of Risk, Assurance & Compliance; or
- [rac@clinigengroup.com](mailto:rac@clinigengroup.com)

In addition, you can use our secure Clinigen Integrity Line (CIL) to report concerns or any misconduct confidentially and anonymously where allowed by local law.

## **What happens after you speak up?**

We require everyone's vigilance to create and sustain an inclusive, equitable and respectful workplace and actively encourage you to speak up and share your concerns or report any misconduct.

We take every concern seriously and each report is investigated fully, promptly, and fairly. We believe each case requires a different level of support and approach to remedy. Persons involved in any misconduct will be subject to the appropriate disciplinary action in line with our disciplinary policies.

If you feel you have been retaliated against, or are aware of possible acts of retaliation, you should immediately contact the Chief People Officer and/or VP of Risk, Assurance & Compliance.



Clinigen's Code of Conduct applies to everyone, regardless of their individual role, seniority or location.

# Our Commitment

Our Code of Conduct includes a number of core principles, organised into the following six categories:

1. Working with each other
2. Working with clients and third parties
3. Acting with integrity
4. Upholding trust
5. Protecting data and information
6. Promoting sustainability

**We are dedicated**

to providing an ethical, compliant route for healthcare professionals to source medicines.

**We aspire**

to deliver quality medicines to the people who need them, all over the world and however challenging the circumstances.

**We promote and support**

the Code in our day-to-day business activities. It reflects the vital role that each person at Clinigen plays in fulfilling our commitment to integrity.

**We comply**

fully with all applicable laws and regulations and the ethical principles contained in the Code.

**We work as One Clinigen**

recognising the value of our collective inquiry. We encourage consultation and questioning around the appropriate course of action. When in doubt, we seek advice from the resources available to us.

**We understand**

deviations from or violations of the Code are not accepted. It is our responsibility to speak up if we become aware of such behaviour.

**We do not tolerate**

any instances of retaliation.

**We acknowledge**

the consequences of breaching the Code. Anyone involved in any misconduct will be subject to the appropriate disciplinary action.

**We affirm**

our understanding of the principles contained in the Code of Conduct and our commitment to abide by them.

# 01

## Working with each other



### **Policies**

[Global Human Rights & Anti-Slavery Policy](#)

[Global Diversity Equity & Inclusion Policy](#)

[Global Health & Safety Policy](#)

[Global Freedom to Speak Up Policy](#)



**We are One Clinigen**

with one Code of Conduct that applies to everyone: employees, directors, contractors, and agents of Clinigen.

**We take responsibility**

for our commitments and actions and are accountable for the outcomes.

**We build trust and relationships**

through honest communication and mutual respect. We are consistent in our words and in our actions.



**We value**

each other's contributions and respect our differences, treating others as we would wish to be treated ourselves.

**We nurture and celebrate success**

across the group, recognising and rewarding everyone's contributions to Clinigen's growth. We promote opportunities to develop talent and skills.

**We put best interests first**

not self-interests. Managerial decisions are based on what is best for the wellbeing of patients, employees, customers, and shareholders.



**We speak up and take care to listen**

because every voice matters. We always speak up when something doesn't seem right or safe, knowing that all concerns, questions and complaints will be taken seriously and handled confidentially. We escalate these concerns to the appropriate channels by making use of the resources available.

**We respect and uphold human rights**

and promote fair labour practices wherever we operate. We do not thrive at the expense of others.

**We embrace diversity and inclusion**

striving to adopt a culture where employees feel comfortable bringing their authentic selves to work. We welcome and value the unique backgrounds, experiences, and perspectives of all our employees, clients, and partners. We do not tolerate discrimination, harassment or victimisation of any kind and provide equal opportunities for all employees throughout their careers at Clinigen.



**We encourage and support**

our colleagues in their personal development and professional training. We celebrate individual achievements and promote a culture of continuous learning.

**We strive to deliver on our promises**

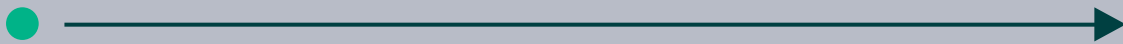
and strive to exceed expectations. We uphold Clinigen's trusted reputation, which comes from the sum of our individual actions.

**We all contribute to a safe working environment**

taking responsibility for ourselves and for each other by complying with all applicable health and safety regulations and laws. We do not come into the office if we are feeling unwell to prevent the spread of infectious diseases. We keep our access badges visible when on site, we do not tailgate, and we respect restricted access areas. We report any incidents, accidents, or near misses at work via the HSE Incident Reporting Hub or to a nominated Health and Safety site lead.

# 02

## Working with clients and third parties



### **Policies**

[Supplier Code of Conduct](#)

[Global Anti-Bribery & Corruption Policy](#)

[Global Anti-Money Laundering Policy](#)

[Global Sanctions Policy](#)



## Working with partners and clients

### **We commit**

ourselves, as professionals, to uphold the trust placed in us by our clients, colleagues, partners, and other stakeholders, operating honestly and fairly in the market.

### **We strive**

to deliver quality services that reflect our professional capabilities and are appropriate to the needs of our clients.

### **We approach**

each situation from a position of transparency, trust, and integrity. Our Code of Conduct is the foundation of that approach.

### **We care**

about who we work with, and what we work on. We consider not only whether we *can* perform an engagement, but whether we *should* perform that engagement.



## Working with third parties including suppliers

### **We reject**

unethical or illegal business practices and expect our suppliers to operate in accordance with applicable laws, respecting individual human rights, and being mindful of the environmental and safety impacts of their products and services.

### **We avoid**

working with people, businesses and other parties whose standards are in conflict with our Code of Conduct. We want to do business with suppliers who share our values and our ethical standards and expect them to adhere to our Supplier Code of Conduct and all applicable laws and policies.

### **We screen**

our suppliers and other third parties prior to engaging with them and strive to ensure our ethical and compliance expectations are met, including Anti-Bribery and Anti-Corruption (ABAC), Anti-Money Laundering (AML), Good Distribution Practices, Falsified Medicines, Serialization, and Sanctions.



## Working with regulators and authorities

### **We uphold**

and adhere to applicable quality standards and regulations that apply to our business activities.

### **We communicate transparently**

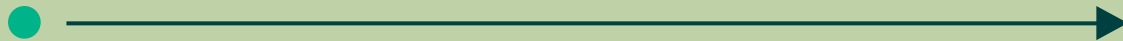
and actively work with regulators to resolve ethical or compliance concerns.

### **We place**

patient safety and product quality at the heart of everything we do, ensuring our quality system and drug safety processes are compliant with all applicable industry laws, standards, and regulations.

# 03

## Acting with integrity



### **Policies**

[Global Quality Policy](#)

[Global Freedom to Speak Up Policy](#)

[Global Anti-Trust Policy](#)

[Global Anti-Bribery & Corruption Policy](#)

[Global Data Protection Policy](#)

[Clinigen Compass \(Employee Handbook\)](#)



## Acting with integrity

### **We take responsibility**

for our actions and their impact, and always act with integrity. We do not hide from or ignore issues.

### **We comply**

with our Code of Conduct, and ensure we understand and follow all applicable laws, rules, and regulations.

### **We support**

and encourage one another to follow the Code and act with openness and integrity.

### **We encourage**

discussion of sensitive and difficult topics, so we can support each other and problem solve together. We speak up when we have questions about applicable laws, rules, or regulations, or wish to report any misconduct.

### **We provide**

the Clinigen Integrity Line, a secure system to report concerns confidentially and anonymously.

### **We are accountable**

for our decisions and actions, and for maintaining competence during our career. We stay up to date with mandatory training to refresh our knowledge and skills, and stay open to new ways of doing things.



## Competing fairly and ethically

### **We lead by example**

and take responsibility for our actions. This means we deal and act honestly and fairly with all third parties when we are representing Clinigen. We do not take advantage through manipulation, concealment, misrepresentation, or any unfair practice. Our trusted reputation depends on all of us competing in a fair and ethical manner.

### **We avoid and report**

anti-competitive activity. This includes price-fixing, bid-rigging, and sharing markets. When we meet with competitors, we ensure our discussions remain on legitimate topics and we do not share competitively sensitive information including: costs and pricing, business and commercial strategies and plans, and sales volumes.



## Properly documenting our work

### **We record our time accurately**

and promptly within the Time Track system where required. The hours recorded reflect the work and activities we have completed.

### **We accurately**

and completely record all data. We have a duty to provide our stakeholders with correct and complete information in a timely manner.

### **We ensure**

our records always accurately reflect our business activities and include accurate accounting, financial controls, internal reporting, and taxation records.

### **We keep data**

for as long as we need it in accordance with our privacy policies.

# 04

## Upholding Trust



### **Policies**

[Global Anti-Trust Policy](#)

[Global Conflict of Interests Policy](#)

[Global Anti-Bribery & Corruption Policy](#)

[Global Anti-Money Laundering Policy](#)

[Global Gifts & Hospitality Policy](#)

[Global Donations, Grants, & Sponsorship Policy](#)



## Our objectivity

Our reputation for trust, carrying out our duties and responsibilities with quality, impartiality, and professionalism.

### **We give and receive**

hospitality, entertainment, and gifts responsibly. This is not prohibited, as long as it is permitted under local law and not meant to improperly influence us, our partner, or our customer and is reasonable and proportionate to the circumstances of the relationship. A request must always be made via [Clinigen's Integrity Hub](#) prior to receipt or giving.

### **We practice**

responsible corporate giving and support. We are encouraged to offer our time and expertise in support of charities and other groups in need, as long as this does not interfere or create conflict with our work. Clinigen also provides corporate support through in-kind and direct donations.

### **We are alert**

to signs of money laundering. When conducting business with a customer, supplier, or any business partner, if we notice something strange or become concerned about any transactions, we immediately report such concerns to the Risk, Assurance & Compliance Team.



## Our independence

### **We avoid**

any conduct or relationships that could compromise Clinigen's independence.

### **We consider and raise**

any independence concerns, contacting the Risk, Assurance & Compliance Team regarding any transaction or relationship that may violate our Code.

### **We do not allow**

pressure from clients or other third parties to result in unethical behaviour, or place pressure on others to act unethically.

### **We respond appropriately**

to potential conflicts of interests, and never put our own financial or personal interests above our duty to Clinigen and each other. Our reputation and the reputation of Clinigen could be compromised by even the mere appearance of a conflict of interest. If we become aware of a potential conflict of interest, we take immediate steps to report and resolve it.

### **We do not accept**

offer, give, or agree to accept bribes under any circumstances. Specifically, we never offer, promise, or provide anything of value to anyone, whether commercial partners or public officials, to secure any advantage, obtain, or keep customer business or influence any commercial decisions. Neither do we accept or demand anything of value to influence our decision-making on behalf of Clinigen.

# 05

## Protecting Data and Information



### **Policies**

[Global Data Protection Policy](#)

[Global Data Breach Management Procedure](#)

[Global Information Security Policy](#)



## Protecting data and information ●



### **We respect and protect**

all data, intellectual property, and any other assets shared with, or belonging to, our clients, partners, and other third parties, as well as that of Clinigen employees. We always strive to protect any non-public data which is entrusted to us. Data is shared only with those who need to know.

### **We take proactive measures**

in safeguarding documents, computers, and any other data devices that contain personal or confidential information. We do our best to avoid loss, theft, and misuse of company assets.

### **We promptly report**

any loss, theft, or inappropriate disclosure of personal information data through Clinigen's Data Breach Reporting Portal. This is in accordance with applicable laws and Clinigen policies.

### **We never use**

confidential information or personal data for our own personal gain, or for purposes outside of its intended use.

### **We communicate responsibly**

using social media and technology in ways that respect the boundaries, privacy, and confidentiality of everyone we work with.

# 06

## Promoting Sustainability



● —————>

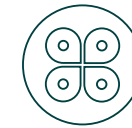
### **Policies**

[Global Environmental Policy](#)

[Sustainability & ESG Strategy](#)



## Contributing to a sustainable business ●



### **We protect**

the environment and take action to minimise our impact wherever and however we can. We seek to reduce waste, energy consumption, and emissions through efficient management and dedicated action.

### **We promote and support**

the physical and mental health and wellbeing of Clinigen employees. Each individual, and their family members, have access to an enhanced Employee Assistance Programme, and we strive to create a healthy working environment where everyone has the opportunity to thrive.

### **We all contribute**

to a safe working environment, taking responsibility for the safety and security of our people and our places of work.

### **We actively engage**

with our partners and suppliers to improve our sustainability performance, and seek to ensure they share our values and comply with all relevant legislation.

### **We uphold**

strong governance practices that promote transparency, accountability, and integrity in all that we do.



# Are we making the right choice?

Doing great things for **Clinigen**, our **partners**, **customers**, and most importantly **patients**, requires everyone to follow our Core Values, our Code, our Policies, and applicable Standard Operating Procedures. When we make decisions in our day-to-day working lives, we must always ask ourselves “are we making the right choice?”

# Pathfinders for Innovative Medicines •

---

**CLINIGEN**

We exist to ensure innovative medicines can reach patients in every corner of the globe – quickly, easily, and safely, whether licensed or unlicensed.

Clinigen is a global, specialist pharmaceutical services company focused on providing ethical access to medicines. The Group supports pharmaceutical and biotech companies across the medical product lifecycle, from clinical through to commercial, and operates from sites in North America, Europe, Africa, and the Asia Pacific.

**Mark Ashton-Blanksby**  
VP Commercial Finance  
[Mark.ashton-blanksby@clinigengroup.com](mailto:Mark.ashton-blanksby@clinigengroup.com)

**Guy Strutton**  
Chief People Officer  
[Guy.strutton@clinigengroup.com](mailto:Guy.strutton@clinigengroup.com)

**Richard Adair**  
General Counsel  
[Richard.adair@clinigengroup.com](mailto:Richard.adair@clinigengroup.com)

Clinigen has more than 1,100 employees across five continents in 15 countries, and provides access in more than 120 countries every year.

For more information on Clinigen, please visit [www.clinigen.com](http://www.clinigen.com)

©2023 Clinigen Limited. All Rights Reserved.