

# Supplier Code of Conduct

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## Contents

<b>A. Introduction</b>	<b>3</b>
<b>B. General expectation: Compliance with applicable laws and international regulations</b>	<b>3</b>
<b>C. Expected conduct in the business environment</b>	<b>3</b>
1. Avoidance of conflicts of interest	
2. Fair competition (antitrust law)	
3. Anti-corruption	
4. Product safety	
<b>D. Human rights-related expectations including labour rights</b>	<b>4</b>
1. Human and labour rights	
2. Equal treatment and non-discrimination	
3. Occupational health and safety	
<b>E. Expected conduct within the company</b>	<b>5</b>
1. Sustainable environmental and climate protection	
2. Handling of data	
<b>F. Implementation and contact persons</b>	<b>5</b>

## A. Introduction

The Aristo Pharma group is committed to environmentally friendly and socially responsible corporate governance. Its employees are expected to respect the principles of ecological, social and ethical conduct and integrate them into the corporate culture. Equally high standards are required of all suppliers.

This Supplier Code of Conduct (SCoC) is aimed at all suppliers who do business with companies in the Aristo Pharma group<sup>1</sup>. Compliance with the SCoC is independent of the location or activity of the suppliers and independent of their obligation to comply with the institutional and legal framework conditions of their respective country.

The behavioural norms contained in the SCoC are not intended to cover every situation or circumstance with which suppliers may be confronted. Rather, they represent general behavioural guidelines to be applied in the conduct of their business activities.

## B. General expectation: Compliance with applicable laws and international regulations

We expect suppliers to:

- comply with all applicable laws, regulations and standards in the countries in which they operate or are located;
- comply with the principles of the United Nations Global Compact, the United Nations International Bill of Human Rights, the International Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights as well as the core labour standards of the International Labour Organization (ILO);
- comply with the Paris Agreement on Climate Change, the Stockholm Convention on Persistent Organic Pollutants, the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal as well as the Minamata Convention on Mercury;
- comply with the anti-corruption conventions of the United Nations (UN) and the Organisation for Economic Co-operation and Development (OECD) as well as the relevant anti-bribery laws.

## C. Expected conduct in the business environment

### 1. Avoidance of conflicts of interest

It must be ensured that decisions regarding business activities with companies of the Aristo Pharma group are exclusively based on objective criteria. Conflicts of interest with personal matters or other economic activities, including those involving relatives or other related persons or organisations, must be avoided from the outset.

### 2. Fair competition (antitrust law)

In accordance with the corporate values of the Aristo Pharma group, we expect fair competitive conduct from suppliers. We also require them to avoid participating in agreements that violate antitrust law, abusing a dominant market position and participating in other anti-competitive business practices.

### 3. Anti-corruption

Any form of corruption, theft, embezzlement, fraud or extortion must be rejected. There is a zero-tolerance policy towards illegal payments, incentives, favours or any other granted advantage or benefit of value to any individual, company or public official with the goal of influencing decision-making processes or facilitating or expediting official acts.

<sup>1</sup> For an overview of companies belonging to the Aristo Pharma group, please go to <https://www.aristo-pharma.com>

#### 4. Product safety

All products sold by the Aristo Pharma group must meet our strict standards for product quality as well as patient and product safety. Therefore, we expect suppliers to comply with generally recognised or contractually agreed quality requirements in order to deliver goods and services that consistently meet the expectations of the Aristo Pharma group.

## D. Human rights-related expectations including labour rights

### 1. Human and labour rights

In accordance with international regulations and standards on human and labour rights, we require suppliers to comply with the following standards:

- Prohibition of child labour: Compliance with the prohibition of all forms of child labour in accordance with the ILO core labour standards;
- Prohibition of forced labour: Rejection of any form of forced or compulsory labour, slavery or human trafficking. Employees must be free to leave their employer at their own discretion, subject to the statutory notice periods;
- Fair treatment: Third parties must not mistreat their employees in any form, including inhumane treatment, corporal punishment, torture, insult, harassment, physical or mental coercion, physical or verbal abuse or the threat of such treatment;
- Expression of opinion, personal rights and privacy: Protection of the right to freedom of expression, personal rights and privacy of employees;
- Freedom of association: Respect for the rights of employees to form employee representative bodies as well as to strike and bargain collectively;
- Remuneration and work hours: Compliance with applicable national legislation on work hours, remuneration, minimum wage and social benefits. If there is no national legislation on work hours, the international standards of the ILO apply.

### 2. Equal treatment and non-discrimination

Any form of discrimination against employees is prohibited. Suppliers undertake to ensure a work environment free from any form of discrimination. No employee may be disadvantaged, favoured or harassed based on characteristics such as gender, skin colour, religion, nationality, political or other beliefs, ethnic origin, disability, age, sexual orientation and identity or other characteristics.

### 3. Occupational health and safety

The establishment and application of an appropriate occupational health and safety management system for the best possible prevention of accidents and work-related illnesses is expected. This includes identification, assessment and reduction of actual and potential accident and health risks; recording and investigation of incidents; training and safety instruction of employees in a format they can understand; provision of suitable work equipment and protective equipment; as well as appropriate measures for emergency preparedness and prevention.

## E. Expected conduct within the company

### 1. Sustainable environmental and climate protection

The Aristo Pharma group recognises the importance of environmental protection and sustainable business activities. Suppliers are expected to do the same by using natural resources (such as water, energy and raw materials) efficiently and rationally, reducing consumption as much as possible to minimise the impact on the environment and complying with all applicable environmental laws and regulations. All necessary environmental permits, authorisations and licences must be obtained and maintained.

Especially, compliance with international conventions on environmental obligations is expected. This includes the use of mercury and mercury compounds in products/manufacturing processes as well as the treatment of mercury waste, the use and disposal of persistent organic pollutants and the collection, storage and disposal of resulting waste or the transboundary movement of hazardous waste and its disposal. Expectations also encompass that new, environmentally friendly techniques and processes will be incorporated into the production chain, that efforts will be made to replace harmful materials and that materials will be properly recycled.

To reduce direct and indirect CO<sub>2</sub> emissions, suppliers are expected to take effective measures in line with the Paris Climate Agreement. This includes continuous improvements and promoting the use of renewable energy and alternative energy sources.

## 2. Handling of data

Compliance with all applicable data protection laws must be ensured by fully protecting personal data and preventing processing of personal data without legal authorisation. Appropriate handling of the supplier's information systems containing confidential information or data of the Aristo Pharma group is expected. Furthermore, appropriate technical protection against unauthorised access must be ensured.

## F. Implementation and contact persons

As part of the Aristo Pharma group's risk management, we frequently analyse suppliers for potential sustainability risks, particularly with regard to human rights and environmental protection. This risk analysis establishes a risk classification of our suppliers and the resulting measures to minimise and eliminate identified risks.

In the event of suspected non-compliance with the expectations set out in this SCoC (e.g. due to negative media reports or other indications), we expect suppliers to notify us immediately of their own findings in this matter and to provide information in response to enquiries. Suppliers should identify the underlying causes of non-compliance and take immediate remedial measures.

The Aristo Pharma group encourages business partners to report any violations (including potential violations) of the laws, regulations and principles contained in this SCoC. Notably, they can do so anonymously and without fear of retaliation. A dedicated reporting channel is available to support effective reporting:

Website: <https://aristo-pharma.portal.tacto.ai/de>

Email: [HumanRightsOffice@aristo-pharma.de](mailto:HumanRightsOffice@aristo-pharma.de)

All reported incidents will be treated fairly, properly reviewed and investigated in strict confidence. If necessary, disciplinary and corrective measures will be taken to close potential regulatory gaps and prevent future violations.