

**CODE OF CONDUCT FOR SUPPLY PARTNERS OF THE
GALENICA GROUP**

Bern, 5. July 2023

Introduction

With this Code of conduct for its supply partners, the Galenica Group¹ fulfills its environmental, social and ethical responsibility in addition to achieving its economic goals. Applicable legal and regulatory requirements are complied with by the Galenica Group and its supply partners. The Galenica Group calls upon its supply partners to support Galenica's efforts to achieve sustainable development and therefore also comply with the principles set out in this Code of Conduct and go beyond legal and regulatory requirements.

Why do we need a Code of Conduct for supply partners?

We believe that society benefits the most when we operate in a socially responsible way and apply responsible business practices. Companies must conduct their business activities in compliance with all regional, national and international laws, regulations and provisions relating to the business activities of supply partners. We also believe it is desirable to adhere to principles that go beyond these requirements and serve society.

This Code of Conduct and the principles it contains apply worldwide.

The principles of this Code of Conduct apply to all employees of supply partners, regardless of their role or relationship with them. The supply partners also commit to ensuring that their suppliers and sub-suppliers are aware of and comply with the provisions of the Code.

Stronger together: Our obligations and those of our supply partners

We also commit to complying with the principles of this Code ourselves. As a reliable, innovative and transparent partner, we, along with our supply partners, contribute to sustainable market success. In particular, economic dependencies between us and our supply partners should be avoided. Our partners also ensure a balanced business relationship.

The principles of the Code of Conduct for supply partners that go beyond legal and regulatory requirements are implemented through continuous improvement, thereby increasing the service level of supply partners over time. Acceptance of this Code forms a mandatory part of every type of business relationship between us and our supply partners.

We reserve the right to carry out checks and audits at our supply partners' in order to verify compliance with the Code of Conduct. When requested, our suppliers will provide us with information that serves to demonstrate compliance with the Code of Conduct. The supply partners

¹ Link to Group structure (affiliated companies): <https://www.galenica.com/en/galenica-netzwerk/index.php>

shall inform us transparently if any of the provisions of this Code cannot be complied with, or can only be complied with in part.

Labour rights and human rights

Human rights

Our supply partners comply with regional, national, and international human rights standards in respect of their employees. The International Labour Standards (ILS) of the International Labour Organization (ILO) are complied with.

Free choice of employment

The employees of our supply partners pursue their employment based on their own free will. Our supply partners do not employ forced labourers, serfs, industrial conscripts or prison inmates on a non-voluntary basis.

Child labour

Our supply partners do not resort to child labour. They comply with the International Labour Organization (ILO) Conventions 138 and 182. Where these are not applicable, they do not employ children under the age of 15 or before they have completed their compulsory education in accordance with local legislation.

Non-discrimination

Our supply partners offer protection against harassment and discrimination at the workplace. They do not tolerate discrimination based on gender, age, sexual orientation, ethnic origin, disability, religion, party and trade union membership, marital status or other personal characteristics.

Fair treatment

Our supply partners ensure that their employees are not treated roughly or inhumanely at the workplace. This means that they are not subjected to, nor are they threatened with, sexual harassment, sexual abuse, physical punishment or psychological or physical coercion or abuse.

Salaries, social costs, and working hours

Our supply partners pay their employees in accordance with applicable laws on salaries. They maintain equal pay between the sexes and avoid excessive working hours.

Security

Our supply partners provide employees with protection of life and health in accordance with the applicable health and safety regulations. They provide employees with a safe working environment, including the provision of protective equipment, in particular.

Freedom of association

Workplace communication is open and problems at the workplace and remuneration issues with employees are resolved directly. In accordance with local laws, our supply partners respect their employees' right to freedom of association, their right to join or not to join trade unions, and to appoint or be elected to an employee representative body. Their employees may discuss employment conditions openly with management without fear of reprisals, intimidation or harassment.

Duties of care with respect to minerals and metals

As part of their supply chain policy regarding minerals and metals from conflict-affected and high-risk areas, our supply partners comply with their legal duty of care obligations, specifically in accordance with the Swiss Code of Obligations and the associated ordinances. To this end, they identify and evaluate, in particular, the damaging effects of minerals and metals in the supply chain originating from conflict-affected and high-risk areas. Our supply partners take appropriate measures to prevent and mitigate these risks.

Ethics

Our supply partners conduct their business activities in an ethical manner and act with integrity.

Business integrity and fair competition

Any corruption, extortion and embezzlement is prohibited. Our supply partners conduct their business activities in accordance with the principles of fair and healthy competition and in compliance with applicable antitrust law. They also apply fair business practices, including accurate, truthful advertising, in particular.

Our supply partners do not offer our employees any gifts or other benefits that represent a personal advantage for employees as a result of a business relationship with the supply partners.

Conflicts of interest

The activities of our supply partners are free of conflicts of interest. Our supply partners ensure that a governance or compliance mechanism that prevents any conflicts of interest is adhered to both internally and externally.

Should our cooperation with a supply partner cause a conflict of interest, this shall be communicated in writing without delay. In particular, a conflict of interest arises if the business collaboration with us or an aspect thereof jeopardises the personal and family interests of the supply partners or their employees or creates an advantage.

Data protection

Our supply partners process personal data in accordance with applicable international, national and regional regulations. They are aware of and comply with the data protection regulations of Switzerland and the European Economic Area, in particular the EU General Data Protection Regulation.

Due to our field of activity, special consideration is given to patient safety and the obligation of professional confidentiality when processing data.

Intellectual property

Our supply partners protect all confidential information and only use it in an appropriate manner. They also ensure that the privacy and intellectual property of all employees and business partners are protected.

Whistleblowing

All employees are able to report concerns or illegal activities at the workplace without fear of reprisals, intimidation or harassment. If necessary, our supply partners will carry out investigations and take remedial action. The statutory requirements regarding a reporting system for anonymous reports of violations of the law, violations of human rights, the existence of environmental risks or other complaints are implemented.

Animal welfare

If this applies to the supply partner's business, animals are treated humanely to minimise pain and stress. Animal testing is only carried out after efforts have been made to reduce the number of animals used and to refine the procedures in order to minimise suffering. If alternatives to animal testing are scientifically sound and accepted by the regulatory authorities, these are preferred.

Environment, health and quality

Our supply partners ensure a safe and healthy working environment and act in an ecologically responsible manner. To ensure they meet these responsibilities, our supply partners integrate quality controls into their business processes.

Health, environment and quality regulations

Our supply partners comply with all applicable quality, health and environmental regulations. They obtain all necessary approvals, permits and licences and carry out all required registrations, as well as maintaining and updating all of these. Our supply partners fulfil their operational obligations and reporting obligations.

Quality

Our supply partners meet generally recognised or contractually agreed quality requirements and offer goods and services that meet our requirements and provide the promised level of service. The quality requirements for goods and services are measured, in particular, in relation to the intended purpose for which they must be safe.

Due to our field of activity, patient safety and the obligation of professional confidentiality are taken into account for the purpose of quality assurance, particularly in the context of prescriptions.

Environment

Our supply partners limit emissions from their activities to the extent that is technically, operationally, and economically feasible. The supply partners regularly verify their conduct regarding the environment to ensure that it complies with the law. In carrying out their business activities, suppliers are guided by the goals of sustainable value creation and responsible use of resources. The respective regional, national and international regulations for the protection of the environment and the conservation of nature are complied with.

Social responsibility

Our supply partners take their social responsibility seriously. In particular, they respect regional, national and international provisions in the social responsibility domain and continuously review their conformity with them.

Waste and emissions

Our supply partners have systems in place to ensure safe handling, transport, storage, recycling or reuse of waste, waste disposal management, exhaust gas purification, and waste water treatment. Any waste, waste water or emissions that could affect human health or the environment is adequately treated, controlled, disposed of and prepared prior to discharge into the environment.

Product safety

For all hazardous substances, our supply partners will provide us and other parties with safety data sheets (MSDS or Material Safety Data Sheets) as required. These will contain all the necessary safety-relevant information.

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References

Universal Declaration of Human Rights
<http://www.un.org/Overview/rights.html>

European Convention on Human Rights
https://www.echr.coe.int/documents/convention_eng.pdf

United Nations Global Compact
<http://www.unglobalcompact.org>

Standards of the International Labour Organization (ILO)
<http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm.ilo.org>

Responsible Care Global Charter
www.responsiblecare.org

OECD Guidelines for Multinational Enterprises
<http://www.oecd.org/daf/internationalinvestment/guidelinesformultinationalenterprises/48004323.pdf>

OECD Due Diligence Guidance for Responsible Business Conduct
<https://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf>

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
<https://www.oecd-ilibrary.org/docserver/3d21faa0-de.pdf?expires=1683638622&id=id&accname=guest&checksum=B414613D0448078062DF2F6B821884B1>

OECD Guiding Principles for Chemical Accident Prevention, Preparedness and Response
<http://www.oecd.org/chemicalsafety/riskmanagementofinstallationsandchemicals/2789820.pdf>