



AVRAMAR

Supplier Code of Conduct

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Introduction

“High Performance with High Integrity” is an Avramar Group strategic imperative.

The Group promotes the societal and environmental values of the United Nations Global Compact to its suppliers and uses its influence where possible to encourage their adoption. The Group Supplier Code (the “Supplier Code”) is based on the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, and other international standards or accepted good practices. The Supplier Code is aligned with the Group Code of Conduct.

The Group requires its suppliers to comply with the standards defined in the Supplier Code. Furthermore, our suppliers are expected to adopt with their own suppliers, standards that broadly cover the same principles as contained in our Supplier Code.

The Group is committed to being a leader in good corporate responsibility and this commitment is embodied in the Supplier Code.

The Supplier Code does not replace local law. The Group expects suppliers to operate in compliance with applicable laws, rules and regulations in addition to the standards contained herein.

Monitoring against our standards

Adherence to the standards contained in this Supplier Code is one of the criteria used in the Group supplier selection and evaluation process.

The Group expects suppliers to adhere to applicable legal standards and any higher standards contained herein.



Responsible Procurement – Ethical Standards

Labor Rights

Suppliers shall be committed to uphold the human rights of workers and to treat them with dignity and respect. The labor elements include:

Freely Chosen Employment

Standard

Suppliers shall not use forced labor, including, bonded, indentured or involuntary prison labor or engage in any form of slavery or human trafficking.

Requirements

- ✦ **Forced Labor - Management Systems:** A nominated manager with responsibility for HR at each site follows policies and procedures to ensure that all onsite workers have freely chosen to be there and are fully paid for the work they do.
- ✦ **Prison Labor:** The use of any prison labor is voluntary and clearly communicated to the Group, and where used, all applicable local laws or international guidance is followed.
- ✦ **Notice Periods:** Workers are free to leave their jobs after reasonable notice and are paid on time and in full for the work they have done prior to leaving.
- ✦ **Retention of Identity Papers/Passports:** Workers are not required to hand over their identity papers to secure employment unless required to do so by local law. If this is the case, workers have access to their papers at all times.
- ✦ **Freedom of Movement:** Workers are able to freely come and go from the site or onsite accommodation at all times and are not controlled by security guards (e.g. monitored during breaks, followed to the toilets, etc.).
- ✦ **Cash Deposits:** Workers do not pay “deposits” to secure a job or employer-provided accommodation, nor do they pay excessive “deposits” for tools, training or personal protective equipment necessary to carry out their jobs safely.

Child Labor and Young Workers

Standard

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 and the age established for completing compulsory education.



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Requirements

- ✦ **Child Labor - Management Systems:** A nominated manager with responsibility for HR ensures that there are adequate policies and procedures in place to monitor the ages of workers at each site.
- ✦ **Child Labor:** Children below the local minimum working age, the age of compulsory education or the ages set out in the International Labor Organization Core Conventions (whichever is higher) are not



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employed.

A child is:

- Any young person below the ages defined in the International Labor Organization Core Conventions, which is 15 in Developed Countries or 14 in Less Developed Countries.
- Any young person below the local legal minimum working age where this is higher than 15.
- Any young person below the age of local legal compulsory education where this is higher than 15.
- ✦ **Remediation:** If children are found working, an appropriate remediation procedure to ensure the welfare of the child is put in place. If children are found working, suppliers will:
 - Remove the child from the workplace immediately.
 - Put in place a suitable plan to support the child, which may involve covering the cost of formal or vocational training, accommodation or other costs as necessary.
- ✦ **Young Workers:** Young people under the age of 18, legally able to work, do not carry out any hazardous work (chemical handling, strenuous physical labor, etc.) or night shifts, and all applicable local laws are followed, including access to education, training, health checks and number of hours allowed to work, etc.

Non-Discrimination

Standard

Suppliers shall provide a workplace free of harassment and discrimination. Discrimination for reasons such as race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, pregnancy or marital status is not tolerated.

Requirements

- ✦ **Non-Discrimination - Management Systems:** A nominated manager with responsibility for HR ensures adequate policies and procedures are in place at each facility to prevent discrimination as well as manage effective disciplinary procedures. All workers know to whom they can report incidences of discrimination.
- ✦ **Non-Discrimination:** Workers do not face harassment or discrimination at any time (from recruitment to leaving employment) for any reason such as race, color, race, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, pregnancy or marital status. Potential recruits are not pregnancy-tested unless required by local law and pregnant women are not discriminated against in accordance with local laws.

Fair Treatment



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Standard

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

Requirements

- ✦ **Fair Treatment - Management Systems:** A nominated manager with responsibility for HR ensures adequate policies and procedures are in place so that all workers receive fair treatment. Workers understand disciplinary and grievance procedures, and fines imposed on workers as part of a disciplinary action are legal and fair.
Supervisors and managers found abusing workers are disciplined accordingly.
- ✦ **Harassment or Abuse:** Workers neither face nor are threatened with bullying, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse.
- ✦ **Role of Security Personnel:** Workers are not subject to unreasonable body searches. Physical security searches are only carried out by authorized bodies, according to local legal standards, and by same-sex security guards.
- ✦ **Fair Treatment - Bribery:** Workers do not have to pay other workers to avoid victimization or preferential treatment.

Wages, Benefits and Working Hours

Standard

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits.

Suppliers shall communicate in a timely manner with workers regarding the basis upon which they will be paid. Suppliers are also expected to communicate with the worker whether overtime is required and the wages to be paid for such overtime.

Requirements

- ✦ **Wages and Working Hours - Management Systems:** A system is in place to monitor the hours and wages paid to all agency staff onsite, and complete hours and payroll records are kept for all workers onsite at all times.
- ✦ **Wages:** Workers are not required to do unpaid work. Workers' monthly pay, or piece rate, is at least at local legal minimum wages or industry benchmarks, and is paid regularly and in full, in accordance with local laws.
- ✦ **Overtime - Pay:** Overtime is paid according to all local laws, and where these do not exist, as a minimum at the same rate as normal pay, but ideally at a premium rate.
- ✦ **Benefits and Bonuses:** All legally required benefits and bonuses are paid to workers on time and in full.
- ✦ **Working Hours:** Working hours are aligned with local laws or industry benchmarks.



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- ✦ **Overtime Hours:** Overtime is voluntary and workers do not regularly work more than 12 hours of overtime per week.
- ✦ **Time-off and Breaks:** Workers are given time off and breaks in accordance with local laws.
- ✦ **Communication:** Payment terms are communicated to workers before they start and confirmed in writing. Workers receive written pay slips.
- ✦ **Deductions:** Deductions for disciplinary issues, lateness and absence are only taken in accordance with local laws.

Health, Safety and Environment

Given the breadth, complexity and size of the Group supply chain, the outlined standards in section 2 and 3 for Health, Safety and Environment (HSE) provide suppliers with basic standards and concepts that the Group expects adherence to throughout its supply chain.

The Group expects each supplier to understand the applicable HSE standards for its specific products or services, and to augment these standards with the additional product/service specific standards as necessary. The effectiveness of the protection needs to be verified by trained and experienced or certified subject matter experts.

Health and Safety

Suppliers shall comply with all applicable health and safety laws and regulations by providing a safe and healthy working environment and, if applicable, safe and healthy company living quarters. The health and safety elements include:

- ✦ **Hazard Information**
Suppliers shall have programs and systems in place to provide workers with safety information relating to hazardous materials and education to protect them from potential hazards. Hazardous materials can include but are not limited to raw materials, isolated intermediates, products, solvents, cleaning agents, and wastes.
- ✦ **Risks and Process Safety**
Suppliers shall have systems and programs in place to identify both occupational and process hazards. They should quantify such hazards and define the risk levels appropriately, and have programs and systems in place to prevent or mitigate these risks (e.g. catastrophic releases of chemicals, fumes, dust).
- ✦ **Worker Protection**
Suppliers shall have systems and processes in place to protect workers from exposure to chemical, biological and physical hazards (including physically demanding tasks) in the workplace and company- provided living quarters.
- ✦ **Emergency Preparedness and Response**
Suppliers shall develop and distribute emergency plans across their facilities and company-provided living quarters. Suppliers should minimize the potential impact of any emergency by implementing suitable emergency plans and response procedures.



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Environment

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

✦ **Environmental Authorizations**

Suppliers shall have processes and systems to conform with applicable environmental laws and regulations. Required environmental permits, licenses, information registrations and restrictions shall be obtained and their operational and reporting requirements followed. ✦

Waste and Emissions

Suppliers shall have processes and systems in place to ensure the safe handling, movement, storage, recycling, reuse, or management of waste. Any generation and disposal of waste, emissions to air and discharges to water, with the potential to adversely impact human health or the environment (giving priority to Active Pharmaceutical Ingredients) shall be appropriately minimized, properly managed, controlled and/or treated prior to release into the environment.

✦ **Spills and Releases**

Suppliers shall have processes and systems in place to prevent and mitigate accidental and diffusive spills and releases to the environment.

✦ **Sustainability and Efficiency of Resources**

Suppliers shall have processes and systems in place to optimize the use of all relevant resources sustainably, such as energy, water and materials.

Anti-Bribery and Fair Competition

Anti-Bribery

Standard

Suppliers shall not bribe any public official or private person and shall not accept any bribes. No intermediaries, such as agents, advisers, distributors or any other business partners, shall be used to commit acts of bribery.

Suppliers shall comply with applicable laws and regulations and industry standards related to anti- corruption.



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Requirements

- ✦ **Facilitation Payments:** No facilitation payments are made, irrespective of whether or not local law permits them.
- ✦ **Gifts, Hospitality and Entertainment:** Gifts, hospitality and entertainment are never offered, promised or provided with the intent of causing the recipient to do something favoring the supplier and/or the Group, to reward such behavior, or to refrain from doing something disadvantaging the supplier and/or the Group. Gifts, hospitality and entertainment are modest, reasonable and infrequent, so far as any individual recipient is concerned.
- ✦ **Grants, Donations and Sponsoring:** Grants and donations are only given if the supplier and/or the Group do not receive, and are not perceived to receive, any tangible consideration in return. Grants and donations are not perceived to reward any tangible consideration. Sponsoring is not to be used (or perceived to be used) to receive an improper commercial advantage in return. Sponsoring must never reward (or be perceived to reward) an improper commercial advantage.
- ✦ **Political Contributions:** If the supplier chooses to make political contributions, they must be made in compliance with all applicable laws, regulations and industry codes and standards, and must not be made with the expectation of direct or immediate return for the supplier or the Group.
- ✦ **Lobbying:** Lobbying is not to be misused for any corrupt or illegal purposes, or to improperly influence any decision.
- ✦ **Public Officials:** Any relationship between the supplier and public officials is in strict compliance with the rules and regulations to which they are subject (i.e. any applicable rules or regulations in the particular country relating to public officials or that have been imposed by their employer). Any benefit conveyed to a public official is fully transparent, properly documented, and accounted for.

Fair Competition

Standard

Suppliers shall conduct their business consistent with fair and vigorous competition. They shall employ fair business practices, including accurate and truthful advertising.

Suppliers shall comply with all fair competition and antitrust laws and regulations.

Data Privacy and Information Protection

Standard

Suppliers shall establish and maintain adequate personal data and information security protection for the information that they, and any third parties acting on their behalf, process.



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Suppliers will operate in a manner that is consistent with applicable data protection/privacy laws and aligned with industry standards for the protection and security of all information, including Personal Information.

Requirements

- ✦ **Proper Protection of Personal Information:** Suppliers shall have the proper organizational structure, processes and procedures to ensure the protection, confidentiality, integrity and availability of information against accidental, unauthorized or unlawful loss, destruction, alteration, disclosure, use or access.
- ✦ **Proper Security Measures:** Suppliers must have adequate policies and procedures in place which address technical and organizational security and take reasonable steps to stay current, and to confirm on a periodic basis, compliance with those.
- ✦ **Compliance with Cross-Border Transfer Restrictions:** 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.
- ✦ **Data and/or Information Breach Notification:** Suppliers shall notify the Group for any suspected or actual data breach concerning the services/deliverables/goods provided. Suppliers shall appropriately assist the Group in any investigations in response to a data or information breach.

Identification of Concerns

Standard

All workers should be encouraged to report concerns or illegal activities in the workplace, without threat of reprisal, intimidation or harassment. Suppliers shall investigate and take corrective action if needed.

Management System

Suppliers shall use management systems to facilitate continual improvement and compliance with these standards. Elements of the management systems include:

Legal and Customer Requirements



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Standard

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

Third-Party Relationships

Standard

Suppliers do not sub-contract or otherwise engage with third parties on behalf of the Group or represent the Group to third parties, without the prior written consent of the Group. Similarly, there is no assignment of the contract, without prior written consent of the Group.

Audit right

Standard

The Group may audit (or engage a third-party auditor to audit) the supplier at any time upon reasonable prior notice, to ensure its compliance with the standards in the Supplier Code Supplemental audit provisions may also apply as agreed between the parties.

Documentation

Standard

Suppliers shall maintain documentation necessary to demonstrate conformance with these standards and compliance with applicable regulations.

Requirements

Suppliers shall prepare and maintains books and records that document accurately and in reasonable detail all matters related to the supplier's business with the Group, accounting for all payments (including gifts, hospitality and entertainment or anything else of value) made on behalf of the Group, or out of funds provided by the Group.

"Off-the-books" accounts and false or deceptive entries in supplier's books and records are prohibited. All financial transactions must be documented, regularly reviewed and properly accounted for. A copy of this accounting is available to the Group upon request.



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Suppliers shall ensure that all relevant internal financial controls and approval procedures are followed and that the retention and archive of books and records is consistent with the supplier's own standards and tax and other applicable laws and regulations. More specific record retention requirements may be agreed between the parties.