



SUSTAINABILITY POLICY

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MESSAGE FROM THE CHAIR OF OUR BOARD ESG COMMITTEE



Over the past century, Zuellig Pharma has forged in Asia an unparalleled reputation as a trusted champion of access to healthcare, underpinned by an unwavering commitment to the highest ethical standards. Our industry-leading sustainability standards are a cornerstone of the trust bestowed upon us by our partners.

True to our core values, through collaboration, innovation, and conscientious decision-making, we are committed to creating a positive legacy for generations to come. This Sustainability Policy is a testament to our constant dedication to environmental stewardship, social responsibility, and responsible economic development.

In this revised edition, building on two years of unrelenting efforts, we further detail and articulate our vision for a sustainable future. This policy is our guiding compass, steering our actions towards meaningful and enduring change. It establishes the framework for responsible practices and enables our teams, suppliers and partners to better understand how we uphold our commitment to sustainability.

The Board ESG Committee will ensure that Zuellig Pharma continues to be evaluated by its success in achieving the ambitious targets set out in this policy. We will remain steadfast in steering the organisation to make further impact, as we look ahead to the next century of making healthcare more accessible and sustainable. This is our commitment to the communities we serve.

With this, we extend an invitation to all – employees, partners, and the broader healthcare community – to join hands in spearheading progress in environmental, social, and governance initiatives across Asia. We eagerly look forward to collaborating with you in leading the way in sustainability.

Thank you for embarking on this journey with us.

STEPHEN PHUA
CHAIR OF THE BOARD ESG COMMITTEE
ZUELLIG PHARMA

MESSAGE FROM OUR CEO

At Zuellig Pharma, our longstanding mission to make healthcare more accessible is the foundation of how we operate and the purpose that drives our passionate teams. This dedication has propelled us to become one of the largest and most trusted healthcare solutions company in the region.

Given our unique position in the healthcare ecosystem, we have tremendous potential to positively impact the communities we serve, and we strive to align our business practices with the United Nations' sustainability principles, considering not only immediate needs of patients across Asia but also the long-term well-being of our employees, clients, customers, patients, partners, and suppliers.

Our Sustainability vision is unwavering: to forge a healthier future for Asia by focusing on four key pillars — Improving Health Outcomes, Nurturing Talent, Respecting the Environment and Upholding the Highest Standards of Integrity. These pillars form the bedrock of our Sustainability Framework.

Since the launch of our Sustainability program, Zuellig Pharma has obtained some of the highest honours bestowed upon a company, for instance three consecutive EcoVadis Platinum ratings, and in our industry the first A-score on supplier engagement by the Carbon Disclosure Protocol, as well as an industry-leading score of B in climate change. Zuellig Pharma is now one of 4,000 global companies to have our carbon reduction targets approved by the Science Based Targets initiative (SBTi). Our progress on each of our Sustainability pillars shapes our Sustainability Policy, which serves as a guiding beacon for fulfilling our commitment to sustainable development at Zuellig Pharma.



It is my hope that the principles outlined in this policy offer clear guidance on how we can collaborate with our stakeholders on this crucial global agenda. This document will stand as an overarching guide, supported by robust environmental, social, and governance policies.

We remain resolutely committed to shaping a healthier future for all in the region, and I look forward to your continued partnership as we persevere on our sustainability journey.

JOHN GRAHAM
CHIEF EXECUTIVE OFFICER
ZUELLIG PHARMA

INTRODUCTION

2.1 PURPOSE

Zuellig Pharma's Sustainability Policy defines our vision for sustainability and establishes key commitments based on our sustainability pillars. It serves as a guiding framework for integrating these principles into our daily operations, strategic planning, and decision-making processes. Our aim is to generate a positive environmental and social impact for our employees, customers, partners, and the communities we operate in. This policy also serves as the overarching foundation for all our other sustainability-related policies, which are detailed in the Sustainability Commitments sections of this document, with a consolidated list provided at the end of this Policy.

2.2 SCOPE

The commitments identified here apply to all individuals associated with Zuellig Pharma, including employees (full-time, part-time, casual, contract), clients, customers, partners, suppliers, and third parties acting on behalf of our company. Our sustainability policy is in effect at all locations where Zuellig Pharma conducts its operations and services. Every member of our organization, including contractors, is expected to actively contribute to maintaining our sustainability commitments and standards. Collaboration among all stakeholders is essential as we collectively work toward a healthier future for Asia.

In the event of any conflict between the provisions of this Policy and local ordinances or laws, the stricter standard must be followed. This means that if local ordinances or laws impose more stringent requirements than those outlined in this Policy, the local regulations take precedence and must be adhered to.



GUIDING PRINCIPLES

3.1 MAKING HEALTHCARE MORE ACCESSIBLE

Making healthcare more accessible in Asia has underpinned Zuellig Pharma's business throughout our hundred-year history and has seen us grow to become one of the leading providers of healthcare services in the region. We actively engage in collaborations and innovative solutions to address healthcare delivery gaps, working towards enhancing the overall health outcomes of communities in the region.

3.2 RESPECT FOR HUMAN RIGHTS

Ensuring the dignity and rights of every person is our top priority. At Zuellig Pharma, we are committed to upholding and promoting human rights in all aspects of our operations. This means that everyone, from our employees to our business partners, will be treated with fairness, respect, and dignity. Our policy is guided by a range of labour and human rights conventions including the **UN Global Compact (UNGC)**¹, the **International Labour Organisation (ILO) Conventions on Labour Standards**², **OECD Guidelines for Multinational Enterprises**³ and the **UN Guiding Principles on Business and Human Rights (UNGPs)**⁴.

¹ [The Ten Principles | UN Global Compact](#)

² [ILO Conventions and Recommendations | International Labour Organisation](#)

³ [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct | OECD](#)

⁴ [Guiding Principles on Business and Human Rights | UN Office of the High Commissioner](#)

3.3 MATERIALITY

Zuellig Pharma prioritizes addressing key sustainability topics identified by a representative panel of internal and external stakeholders. The latest materiality assessment was conducted in late 2023 under the supervision of external consultants to identify and prioritise the most material ESG topics based on a double materiality lens. This process is aligned with industry best practice and involved an extensive engagement of both internal and external key stakeholders. This ongoing approach ensures that our efforts and resources are directed toward making meaningful societal and environmental contributions. We maintain a dynamic approach by staying vigilant about emerging trends, shifts in our operational context, and evolving stakeholder expectations. This proactive stance helps us adapt to the evolving sustainability landscape and fosters a culture of continuous improvement.

Recognizing that our clients and stakeholders have their own unique sustainability priorities, we collaborate to meet their needs and expectations. We are unwavering in upholding high ethical standards and aligning our actions with global norms and principles whenever feasible. This underscores our dedication to ethical and sustainable business practices while reinforcing our commitment to ongoing improvement.



GUIDING PRINCIPLES

(CONTINUED)

3.4

TRANSPARENCY AND ACCOUNTABILITY

Zuellig Pharma is committed to transparency in our sustainability efforts. We openly communicate our sustainability goals, objectives, and progress to our stakeholders.

To ensure credibility and alignment with industry standards, we have adopted EcoVadis as our primary certifying body, given its widespread recognition in the healthcare sector and beyond. Our most recent EcoVadis scoring can be found [here](#).

We take accountability seriously and aim for the highest level of transparency in our reporting. Our sustainability reports adhere to the Global Reporting Initiative (GRI) Standards, contributing to international efforts for consistent sustainability reporting. External assurance of our sustainability report, conducted by an independent third party, further enhances the credibility and transparency of our claims.

Our latest Sustainability Reports can be found [here](#).

3.5

TRANSPARENCY AND ACCOUNTABILITY

Zuellig Pharma conducts our business with integrity, placing the highest value on ethical behaviour and social responsibility. The **ISO 26000 Standards on Social Responsibility**⁵ guide us to make decisions that prioritise ethical business conduct and contribute positively to the well-being of communities, employees, partners, the environment, and society at large.

3.6

SUSTAINABLE DEVELOPMENT

Zuellig Pharma adopts the United Nation's principle of sustainability of "meeting the needs of the present without compromising the ability of future generations to meet their own needs", by looking beyond immediate needs to consider the long-term future of our employees, clients, customers, partners, and suppliers.

Zuellig Pharma has aligned our sustainability framework to the **UN Sustainable Development Goals (SDGs)**⁶, specifically focusing on:



3.7

CULTURE OF INNOVATION

At Zuellig Pharma, we foster an innovative culture that promotes creative problem-solving to provide healthcare solutions, even in remote Asian communities. Through ongoing collaboration with business partners and stakeholders, we constantly explore new and innovative approaches to tackle challenges. This collective effort drives positive impact, improves our products and services, and advances sustainability, benefiting our business, customers, and society as a whole.

⁵ [ISO 26000 — Social responsibility | ISO](#)

⁶ [UN Sustainable Development Goals \(SDGs\)](#)

ZUELLIG PHARMA'S COMMITMENT TO BUILDING A HEALTHIER FUTURE FOR ASIA

At Zuellig Pharma, we are committed to five core values which are the driving force behind who we are and what we do: **Collaboration, Passion for Excellence, Personal Growth, Innovation, Integrity and Trust.**

Built upon four foundational pillars, our Sustainability Framework aligns with our core values, serving as the guiding force towards our Sustainability Vision of building a healthier future for Asia with our Clients, Suppliers and Customers.

SUSTAINABILITY FRAMEWORK

PURPOSE

Making Healthcare More Accessible

SUSTAINABILITY VISION

Building a healthier future for Asia with our Clients & Customers

Improving Health Outcomes



- Access to Healthcare
- Access to Innovation
- Community Empowerment
- Equitable Healthcare Systems

Nurturing Talent



- Talent Development and Engagement
- Workplace Health, Safety and Employee Wellbeing
- Diversity, Equity and Inclusion
- Labour Practices and Human Rights

Respecting The Environment



- Climate Governance
- Climate Change Mitigation
- Circular Waste Management
- Environmental Preservation



Setting The Highest Standards Of Integrity

- Patient Safety
- Supply Chain Security
- Data Governance and Security
- Responsible Procurement
- Ethical Business Conduct

RESPECTING THE ENVIRONMENT: ENVIRONMENTAL COMMITMENTS

Zuellig Pharma believes that we have an ethical responsibility to protect the environment.

MATERIAL TOPICS

Respecting the Environment is a key pillar upon which our sustainability strategy is founded. Our material topics in this area include:

- Climate governance
- Climate change mitigation
- Circular waste management
- Environmental preservation

GOALS

Through addressing these material topics, our pillar goals are to:

- Achieve the lowest carbon impact on the environment
- Build climate-change resilient infrastructure & systems

TARGETS

- Achieve zero waste going to landfill by 2030
- Achieve ISO14001 certification across all key distribution markets by 2025
- Reduce Scope 1 & 2 emissions by 42% by 2030 versus a 2021 baseline
- Reduce Scope 3 emissions by 25% by 2030 versus a 2021 baseline
- Zuellig Pharma is committed to reaching net zero emissions by 2045, demonstrating our dedication to combating climate change.
- By 2030, we aim for 70% of our energy usage to come from renewable sources, with a commitment to achieving 100% thereafter as part of our Net Zero roadmap.

COMMITMENTS

Our material topics are underpinned by our commitments to Respecting the Environment, which are:

- Adopt a precautionary approach towards environmental challenges, undertaking initiatives to promote greater environmental responsibility, and encouraging development and diffusion of environmentally friendly technologies, in alignment with **UN Global Compact's Principles (7 to 9)**⁷.
- Deliver on our **science-based targets (SBTi)**⁸, recognized by SBTi as in alignment with the 1.5°C ambition, currently the most ambitious designation available through the SBTi process.
- Operate in strict compliance with all applicable environmental laws and regulations.
- Disclose our climate progress through annual submission to **CDP**⁹ (previously the Carbon Disclosure Project).
- Align to the **TCFD Framework**¹⁰ recommendations to ensure climate resilience.
- Conduct business and operation in conformance with the local environmental laws and regulations in each in market we operate in.
- Adhere to **ISO 14001 Environmental Management**¹¹ systems as a framework for the company to follow for effective environmental management.
- Zuellig Pharma will not allocate any funding towards climate denial or lobbying against climate regulations, reinforcing our commitment to sustainability and responsible business practices.

RELATED POLICIES

Our [Code of Conduct](#) and [Environmental management approach](#) underpins out how we maintain environmental standards at Zuellig Pharma. These policies are reviewed regularly to ensure compliance with the latest international standards.

EXPECTATIONS OF SUPPLIERS

All suppliers must adhere to our [Supplier Code of Conduct](#) which includes an expectation to operate in an environmentally friendly manner and in strict compliance with all applicable environmental laws and regulations and disclosure of environmental performance.

⁷ [The Ten Principles | UN Global Compact](#)

⁸ [Corporate climate action | Science Based Targets](#)

⁹ [Home - CDP](#)

¹⁰ [Recommendations | Task Force on Climate-Related Financial Disclosures](#)

¹¹ [ISO 14001 and related standards — Environmental management | ISO](#)



NURTURING TALENT: SOCIAL COMMITMENTS

Our dedicated employees are the driving force behind our mission of making healthcare more accessible. Their health, well-being, and enthusiasm are crucial for the success and sustainability of our business. Likewise, the suppliers we collaborate with play a pivotal role in achieving our mission.

MATERIAL TOPICS

Nurturing Talent is a key pillar upon which our sustainability strategy is founded. Our material topics under this pillar include:

- Talent development and engagement
- Workplace health, safety and wellbeing
- Labour practices and human rights
- Diversity, equity and inclusion

GOALS

Through addressing these material topics, our pillar goals are to:

- Provide a conducive environment for work
- Enable individuals to become their best selves

TARGETS

- Achieve ISO45001 certification across all key distribution markets by 2025

COMMITMENTS:

Our material topics are underpinned by the following commitments to Nurturing Talent, which are:

- Strong adherence to the **UNGC Principles (1 to 6)**¹² where Zuellig Pharma commits to:
 - Defend the protection of proclaimed human rights as individuals and as an employee in the workplace;
 - Respect an employees' freedom of association and collective bargaining;
 - Eliminate any form of forced, compulsory or child labour;
 - Eliminate discrimination based on personal characteristics unrelated to an individual's ability to perform at work.
- Proactively address and prevent any modern slavery risks through **Third-Party Audits** to ensure Zuellig Pharma mitigates risk and complicity in human rights abuses.
- Cultivate a work environment built on the premise of diversity and equity through fair and equitable practices across business practices.
- Sustain relationships with a diversity of businesses, through supporting suppliers from local communities where we operate.
- Zero-tolerance policy for harassment and abuse by protecting workers from any acts of physical, verbal, sexual or psychological harassment, bullying, abuse, or threats in the workplace, providing a reporting channel for incidents, and acting swiftly upon any incidents notified.
- Conduct business in conformance with the local health and safety laws and regulations where we are present, that are aligned with global industry standard **ISO 45001 Health and Safety Management System**¹³.
- Fair and equitable treatment, compensation, and legally mandated benefits of all employees, regardless of their role, location, or working arrangement, adhering to local labour laws and agreements.

¹² [The Ten Principles | UN Global Compact](#)

¹³ [ISO 45001:2018 - Occupational health and safety management systems | ISO](#)

NURTURING TALENT: SOCIAL COMMITMENTS

(CONTINUED)

Our social commitments are underpinned by the principles contained within the:

- **UN Universal Declaration of Human Rights (UDHR)¹⁴**
- **UN Guiding Principles on Business and Human Rights (UNGPs)¹⁵**
- **OECD Guidelines for Multinational Enterprises¹⁶**
- **Pharmaceutical Supply Chain Initiative (PSCI)¹⁷** and
- **ILO Core Conventions on Labour Standards¹⁸.**

RELATED POLICIES

Our Code of Conduct, Anti-Discrimination & Harassment Policy, Workplace Health & Safety Policy, Labour & Human Rights Policy, Recruitment & Selection Policy, Retention Policy, Internal Job Transfer Policy, Employee Referral Policy and Training & Development Policy set out how we maintain labour standards and protect our employees at Zuellig Pharma. These policies are reviewed regularly to ensure compliance with the latest international standards.

EXPECTATIONS OF SUPPLIERS

These above principles and policies around labour and human rights extend to Zuellig Pharma's expectations of our suppliers. Suppliers must comply with our Supplier Code of Conduct which includes strict compliance with all applicable labour laws and regulations.

¹⁴ [Universal Declaration of Human Rights | United Nations](#)

¹⁵ [Guiding Principles on Business and Human Rights | UN Office of the High Commissioner](#)

¹⁶ [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct | OECD](#)

¹⁷ [The PSCI Principles | Pharmaceutical Supply Chain Initiative](#)

¹⁸ [ILO Conventions and Recommendations | International Labour Organisation](#)



SETTING HIGHEST STANDARDS OF INTEGRITY: GOVERNANCE COMMITMENTS

Zuellig Pharma's role in the healthcare industry demands that we uphold the highest ethical standards in all aspects of business. Our commitment to integrity is a fundamental ingredient of business success, and the cornerstone of an unrivalled reputation for trust, transparency, and service.

MATERIAL TOPICS

Setting the highest standards of integrity is a foundational pillar upon which our sustainability strategy is founded. Our material topics under this pillar include:

- Patient safety
- Supply chain security
- Data governance and security
- Ethical business conduct
- Responsible procurement

GOALS

Through addressing these material topics, our pillar goals are to:

- Reinforce our position as a trusted partner for our stakeholders
- Operate responsibly
- Leverage unique capabilities to improve supply chain transparency

TARGETS

- Be TAPA-certified across all key distribution markets by 2025. Markets will target achieving a minimum of Level C readiness, while concurrently devising a comprehensive plan to elevate preparedness to Level A.
- Achieve ISO 27001 certification across all key distribution markets by 2025.
- 100% of compliance incidents investigated with relevant corrective actions agreed upon and implemented.
- 100% of Zuellig Pharma employees trained on the Code of Conduct, as well as on business ethics relevant to their responsibilities, i.e., Interaction with Healthcare Practitioners.
- 100% of new critical suppliers targeted from Tier 1 and Tier 2 covered by Supplier Sustainability Due Diligence Questionnaire.
- Inclusion of sustainability criteria scoring in new transport suppliers selection process.
- 100% performance rate in planned audits on targeted Tier 1 and Tier 2 suppliers



SETTING HIGHEST STANDARDS OF INTEGRITY: GOVERNANCE COMMITMENTS

COMMITMENTS:

Our approach to setting the highest governance standards is outlined through the following commitments:

- Operate a robust quality management system that ensures product integrity, product security, patient safety, and a culture of quality in compliance with **ISO 9001 Quality Management Systems**¹⁹ and **ISO 13485 Medical Devices Management Systems**²⁰ certification.
- Uphold the highest level of supply chain security set out in our internal Security Policy and aligned with **PSCI**²¹, **UNGPs**²² and **Transported Asset Protection Association (TAPA)**²³ certification.
- Zero tolerance for anti-bribery & corruption as outlined in our Code of Conduct, Anti-Corruption & Anti-Bribery Policy, Conflicts of Interest Policy, Interactions with Healthcare Providers Policy, Gifts and Hospitality Policy, Fraud Reporting Policy and Third-Party Anti-Corruption Due Diligence Policy and aligned to **OECD Guidelines for Multinational Enterprises and UN Convention Against Corruption (UNCAC)**²⁴.
- Rigorous compliance and communication to ensure healthcare stakeholders make informed decisions on medicine usage, supported by our Interactions with Healthcare Providers Policy, and by implementing robust Promotional Materials Standard Operating Procedures and Pharmacovigilance Standard Operating Procedures, coupled with the requirements of applicable local laws, regulations, and industry codes.
- Strict compliance with laws and regulations on personal data collection, security, and confidentiality, with data management practices governed by our Corporate Data Privacy Policy and Information Security Policy.
- Deliver positive environmental, social and economic impact across our supply chain through our sustainable procurement or responsible sourcing approach, outlined in our Sustainable Procurement Policy
- Ensure that our products or services do not contain metals derived from minerals or their derivatives originated from Conflict Affected and High-Risk Areas (CAHRAs) that directly or indirectly finance or benefit armed groups and cause or foster human rights abuses.

- Provide clear direction in selecting and managing our suppliers in terms of sustainability, with our priority selection areas including upholding the right ethical standards, championing fair labour practices, caring for the environment, demonstrating health and safety, and showing transparency through reporting and governance.
- Adopt a pragmatic and inclusive approach to support smaller local suppliers who may not be able to immediately comply with all our sustainability requests.
- Provide training to our employees on our Code of Conduct and business ethics, and Information Security and Data Privacy practices to ensure a high level of capability and integrity within the business.
- Promote supplier diversity.

RELATED POLICIES

Aside from the policies highlighted above, our Code of Conduct and Enterprise Risk Management Policy sets out how we impose high standards of conduct and identify, assess, and mitigate potential risks across our people, processes and systems. Zuellig Pharma's policies are reviewed regularly to ensure compliance with the latest international standards.

EXPECTATIONS OF SUPPLIERS

All suppliers must adhere to our [Supplier Code of Conduct](#) which includes an expectation to operate in a responsible manner and in strict compliance with all applicable labour, supply chain and governance-related laws and regulations.

¹⁹ [ISO 9001 and related standards — Quality management | ISO](#)

²⁰ [ISO 13485 - Medical devices — Quality management systems | ISO](#)

²¹ [The PSCI Principles | Pharmaceutical Supply Chain Initiative](#)

²² [Guiding Principles on Business and Human Rights | UN Office of the High Commissioner](#)

²³ [TAPA Security Standards | TAPA Asia-Pacific](#)

²⁴ [UN Convention Against Corruption | UN Office on Drugs and Crime](#)

BEYOND ESG:

IMPROVING HEALTH OUTCOMES AND MAKING HEALTHCARE MORE ACCESSIBLE

Zuellig Pharma recognises the unique role we play in the healthcare ecosystem, and the inherent positive impact brought about by our work of making healthcare more accessible in Asia. For this reason, our Sustainability Policy goes beyond Environment-Social-Governance (ESG) commitments to highlight how we continue our crucial work of improving health outcomes.

MATERIAL TOPICS

Improving Health Outcomes is a key pillar upon which we define how we intend to address making healthcare more accessible in the region and achieve our organisational mission. Our material topics in this area include:

- Access to healthcare
- Access to innovation
- Community empowerment
- Equitable healthcare systems

GOALS

Through addressing these material topics, our pillar goals are to:

- Improve patients' access to medicines in the communities we serve
- Reduce the burden of cost of access to healthcare on healthcare systems
- Harness partnerships and digital solutions to improve the health of local communities

COMMITMENTS:

Our material topics are underpinned by our commitments to Improving Health Outcomes, which are:

- Adopt innovative solutions that enable enhanced access and affordability of vital medicines and healthcare for individuals that are aligned to principles of the **Access to Medicine Index**²⁵.
- Implement preventative care initiatives in each country where Zuellig Pharma operates in alignment with **SDG 3 (3.3 and 3.4)**²⁶.
- Proactively engage with partners, clients, customers, suppliers, and governments to promote healthy behaviours and elevate the standard of healthcare in local communities.
- Equip our Healthcare Professionals with enhanced tools and coverage to improve access to healthcare services and information for patients in the region.

RELATED POLICIES

Our Core Values and Code of Conduct sets out how we maintain our expectations and commitment to make healthcare more accessible in Asia.

EXPECTATIONS OF SUPPLIERS

All suppliers must adhere to our [Supplier Code of Conduct](#) which includes an expectation to operate in a sustainable manner and in strict compliance with all applicable laws and regulations.

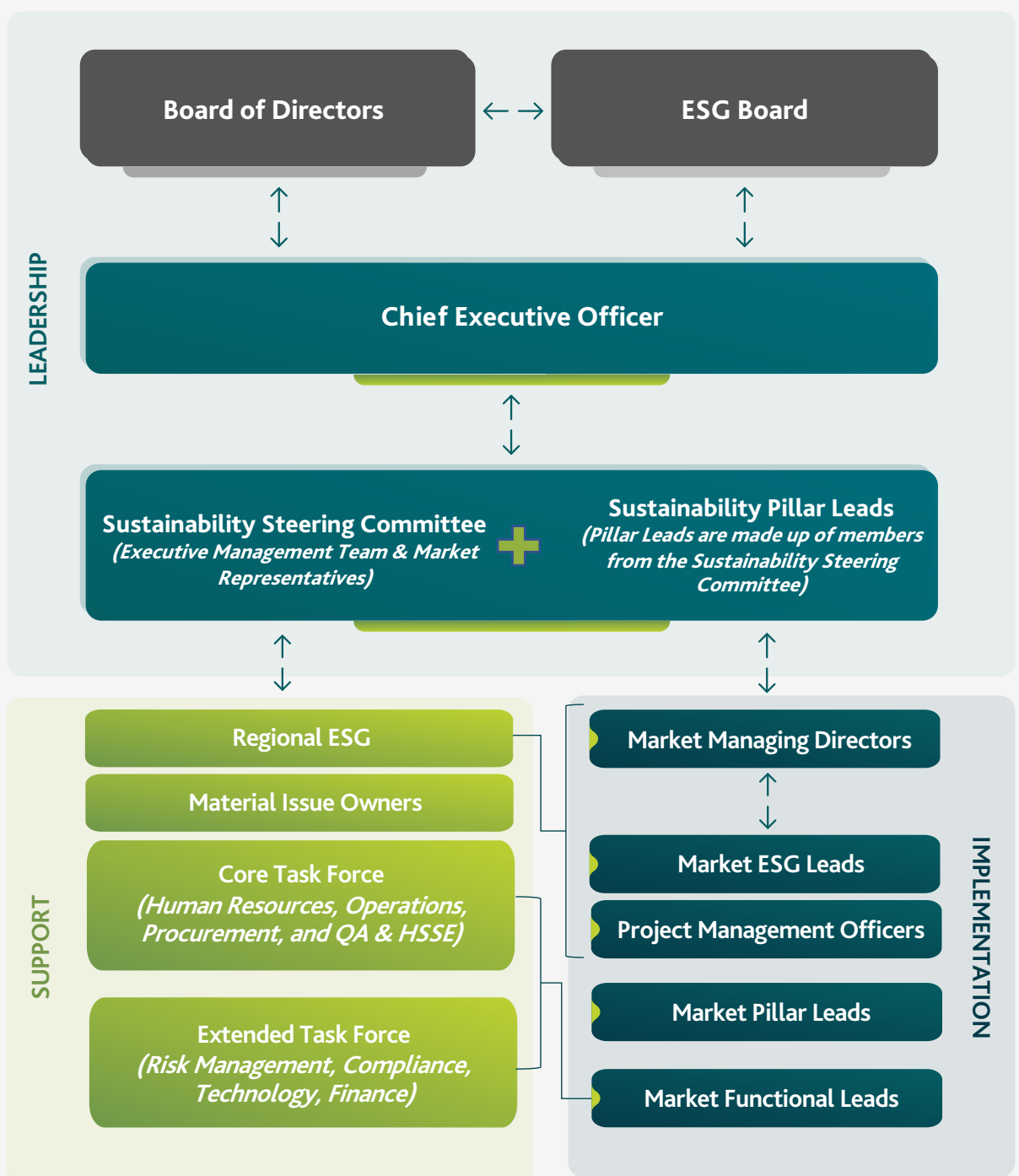
²⁵ [2022 Access to Medicine Index | Access to Medicine Foundation](#)

²⁶ [Goal 3 | Department of Economic and Social Affairs \(un.org\)](#)



POLICY GOVERNANCE, ROLES AND RESPONSIBILITIES

Zuellig Pharma has established a governance structure to ensure accountability and responsibilities for sustainability-related matters are clearly defined.



POLICY GOVERNANCE, ROLES AND RESPONSIBILITIES

(CONTINUED)

In 2023, the ESG Committee of the Board was established to provide specific counsel, oversight, and direction on sustainability-related matters.

The Sustainability Policy is owned by the Regional Sustainability Team and approved by the ESG Committee of the Board.

ROLE	RESPONSIBILITIES
<p>The Board</p>	<ul style="list-style-type: none"> • Maintains oversight of the sustainability agenda. • Reviews and considers the material topics in guiding business strategy and major plans of action. • Ensures that decisions made by the organization support Zuellig Pharma ESG commitments and priorities. • Works and liaises with the Management to ensure alignment with the Group's ESG Strategy.
<p>ESG Committee of the Board</p>	<p>Overall responsibilities:</p> <ul style="list-style-type: none"> • Reviews and endorses requests for investment in relevant ESG-related initiatives in-line with the Group's ESG strategy. • Together with the Audit and Risk Committee, oversees the management of sustainability-related risks. • Provides input and guidance concerning communications with internal and external stakeholders regarding the Company's approach to ESG. • Provides updates on relevant ESG-related matters to the Board, including recommendations to address ESG-related matters. • Ensures that ESG is incorporated into the purpose, governance, decision-making, and accountability reporting of the Company. • Monitors performance and progress against goals and targets. <p>Responsibilities pertaining to Sustainability Policy:</p> <ul style="list-style-type: none"> • Monitors ESG developments and opportunities, primarily from clients and regulators, and assesses impacts on industry and Zuellig Pharma. • Updates the Group's approach to its sustainability policy, strategy, and material topics in the context of external best practices and applicable monitoring and / or reporting requirements. • Assesses and reviews the Group's Sustainability strategy and policy and recommends material changes to the Board for approval. • Approves material policies of the Group relating to ESG matters and reviews progress on metrics and/or KPIs relating to the Group's ESG Strategy.

POLICY GOVERNANCE, ROLES AND RESPONSIBILITIES

(CONTINUED)

ROLE	RESPONSIBILITIES
Sustainability Steering Committee	<ul style="list-style-type: none"> Responsible for setting, executing, and implementing the sustainability strategy Responsible for driving progress and execution across markets in each pillar and ensuring material topic owner accountability Provides strategic and tactical guidance to Sustainability teams Reviews and approves the information and disclosures reported in the sustainability reports. Reports to the Board on progress via the CEO
Regional Pillar Leads	<ul style="list-style-type: none"> Accountable for the four key pillars of the sustainability strategy
Regional Material Topic owners	<ul style="list-style-type: none"> Accountable for the 17 material topics of the sustainability strategy
Regional Sustainability Team	<ul style="list-style-type: none"> Responsible for ESG strategy shaping and implementation Reports to Sustainability Steering Committee and provides insights to keep Committee abreast of upcoming regulations and policies Develops and implements policies and initiatives to further Zuellig Pharma's Sustainability Agenda Supports markets and regional functions in their implementation of stronger sustainability practices Monitors and drives sustainability performance Drives sustainability awareness, commitment, and culture within the organization
Regional Functional Heads	<ul style="list-style-type: none"> Support and drive key sustainability initiatives falling under their scope of responsibilities
Managing Directors Market ESG Leads Market Project Management Officers Market Pillar Leads Market Functional Heads	<ul style="list-style-type: none"> Responsible for the on-track implementation of ESG initiatives, in accordance with roadmap approved by the Board and Sustainability Steering Committee.
Employees	<ul style="list-style-type: none"> Employees are expected to perform their duties to the best of their ability to support the implementation of the Sustainability Policy.
Suppliers	<ul style="list-style-type: none"> All suppliers must adhere to our Supplier Code of Conduct that includes an expectation to operate in a responsible manner and in strict compliance with all applicable laws and regulations.

Feedback loops from stakeholders and benchmarking against industry best practices further enhance our evaluation mechanisms, facilitating continuous improvement in our Sustainability Policy.

GRIEVANCE MECHANISMS

Zuellig Pharma is an organisation with a strong commitment to compliance and ethics. This includes our environmental, social and in general sustainability impacts. We strongly encourage an environment where open, honest communications are the expectation, not the exception. It is the responsibility of our personnel to report any suspected or occurring violations of the Sustainability Policy or other Zuellig Pharma policies.

Zuellig Pharma maintains a Speak Up Policy as well as a dedicated, multi-lingual Speak Up Communication Channel to enable all internal and external stakeholders to report any suspected or occurring violations of the Zuellig Pharma's policies. The hotlines and websites are operated by Navex, an independent third party, and allow reports to be submitted anonymously and confidentially. These channels are available 24 hours a day, 7 days a week, and are available in the local languages of the markets in which we operate. We have a strict no-retaliation policy for anyone who submits a report in good faith. The reports from this channel are reviewed by our Audit committee for appropriate follow-up.



WEBSITE

www.zuelligpharma.ethicspoint.com



EMAIL

zpspeakup@zuelligpharma.com



POLICY BREACHES

Should we identify any risks related to our environmental, social and governance actions, we will take necessary steps to mitigate these risks to the greatest extent possible. Any breach to the Sustainability Policy will be investigated and managed depending on the extent and severity of the behaviour.

11.1 EMPLOYEES

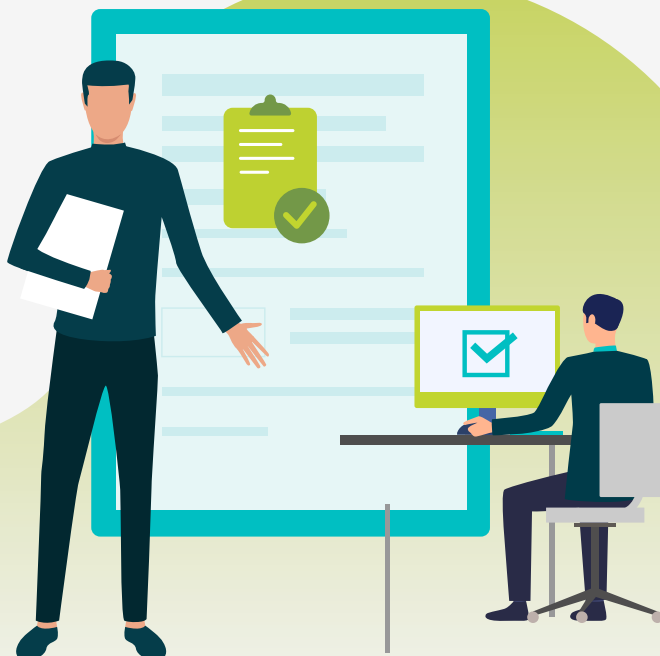
In the event employees breach the Sustainability Policy, a fair and impartial investigation will be launched to ascertain the details of the violation. The response will be proportionate to the violation's seriousness and may range from corrective actions, such as training or counselling, to disciplinary measures, including written warnings, suspensions, or, in severe cases, termination of employment.

However, Zuellig Pharma will emphasise fostering a culture of education and compliance, offering opportunities for employees to understand and uphold the sustainability policy's principles through regular training and open communication channels.

11.2 PARTNERS, SUPPLIERS, AND THIRD PARTIES

In the event Zuellig Pharma becomes aware of partners, suppliers, or third parties acting in conflict to the Sustainability Policy, a thorough assessment will be conducted to determine the nature and severity of the violation. Depending on the findings, appropriate actions will be taken, which may include engaging in discussions with the client to understand the circumstances and areas of improvement to align with the Policy.

In the first instance, Zuellig Pharma will prioritise collaboration and education to encourage stakeholders to align with our sustainable practices and values. If the violation persists or poses significant risks to Zuellig Pharma's commitment to sustainability, we may consider revising or terminating the business relationship.



RELATED POLICIES AND DOCUMENTS

The following list of policies and procedures serves as a consolidated list of documents referred to throughout the Sustainability Policy. The Sustainability Policy acts as an overarching generic policy for all our other sustainability-related policies, which have been included under the Sustainability Commitments sections of this document, as below.

CODE OF CONDUCT	
<u>Code of Conduct</u>	Outlines the broad principles and responsibilities of legal and ethical business conduct under which Zuellig Pharma conducts its business.
<u>Supplier Code of Conduct</u>	Outlines the expectations of suppliers in how they act and comply with relevant sustainability legislation, regulations and standards.
POLICIES	
<u>Anti-Corruption & Anti-Bribery Policy</u>	Sets the standards of conduct and business practice that must be followed when representing Zuellig Pharma when interacting with private entities and government officials and dealing with vendors seeking to do business with the company.
<u>Anti-Discrimination & Harassment Policy</u>	Establishes how Zuellig Pharma will create an equal-opportunity environment, protect workers from acts of harassment, bullying, abuse or threats in the workplace and how reports will be handled by the organisation.
<u>Conflicts of Interest Policy</u>	Provides guidelines on situations where conflicts of interest may arise and how to disclose and resolve matters at Zuellig Pharma.
<u>Corporate Data Privacy Policy</u>	Sets out how Zuellig Pharma governs data privacy and safeguards sensitive information to ensure compliance with privacy regulations and ISO standards. Provides guidelines on how Zuellig Pharma collects, handles, processes, and respects personal data of patients, customers, employees and other stakeholders.
<u>Employee Referral Policy</u>	Sets out the processes and reward system for employees who recommend potential candidates for open job positions at Zuellig Pharma.
<u>Environmental Policy</u>	Sets out the commitments and standards to minimise Zuellig Pharma's impact on the environment. Outlines the commitment of the organization to the laws, regulations, and other policy mechanisms concerning environmental issues.
<u>Fraud Reporting Policy</u>	Provides guidance to Zuellig Pharma divisions for reporting fraud occurrences to Corporate Office.

RELATED POLICIES AND DOCUMENTS

(CONTINUED)

<p>Gifts and Hospitality Policy</p>	<p>Provides guidelines for Zuellig Pharma employees on giving and receiving gifts, entertainment, and favours to ensure ethical conduct, prevent conflicts of interest, and maintain transparency.</p> <p>Sets the minimum standards for giving or receiving Gifts and Hospitality to or from anyone Zuellig Pharma does business with.</p> <p>Defines appropriate rules and criteria regarding gifts and hospitality to guard against the risk of allegations of impropriety.</p>
<p>Enterprise Risk Management Policy</p>	<p>Outlines the strategies employed to identify, assess, mitigate, and monitor potential risks that could impact Zuellig Pharma and our operations, locations, and stakeholders</p> <p>Establishes risk management guidelines based on ISO 31000 standards, to provide oversight of the principal risks facing the business and the approaches to identify, assess, mitigate, and monitor potential risks that could impact Zuellig Pharma in achieving its objectives.</p> <p>Establishes the scope, policies and processes that describe how risks are managed within the organization.</p>
<p>Information Security Policy</p>	<p>Provides guidance on the protection of intellectual property, effective information handling and response to security incidents.</p>
<p>Interactions with Healthcare Providers Policy</p>	<p>Sets out the standards of conduct and business practices to ensure that Healthcare Providers are not being inappropriately influenced by Zuellig Pharma representatives.</p>
<p>Internal Job Transfer Policy</p>	<p>Sets out the process for Zuellig Pharma employees to follow when seeking opportunities to move from one position to another within the organisation</p> <p>Lays out how an employee can transfer or be promoted to a new role within Zuellig Pharma.</p>
<p>Labour & Human Rights Policy</p>	<p>Defines the labour and human rights standards at Zuellig Pharma, that is aligned with the Code of Conduct and Anti-Bribery and Anti-Corruption Policy.</p>
<p>Recruitment & Selection Policy</p>	<p>Sets out the minimum requirements for the recruitment processes, provides guidance for hiring processes to operate in a fair, open and equitable manner, and ensure all positions within the company are staffed by suitably qualified and competent staff.</p>

RELATED POLICIES AND DOCUMENTS

(CONTINUED)

<p>Retention Policy</p>	<p>Outlines the systemic approach to the maintenance, retention and disposal of corporate records and data, in accordance with regulatory requirements.</p> <p>Sets guidelines and procedures the organization creates to ensure employees feel fulfilled and satisfied at work and, ultimately, stay with the organization.</p>
<p><u>Speak Up Policy</u></p>	<p>Outlines the channels available for stakeholders to anonymously raise questions or report concerns over any alleged misconduct at Zuellig Pharma.</p>
<p>Security Policy</p>	<p>Sets out guidelines for how Zuellig Pharma maintains the highest level of supply chain security within the business.</p>
<p>Sustainable Procurement Policy</p>	<p>Provides clear direction for employees who lead or take part in selecting and managing our external suppliers in terms of sustainability. Our priority areas include:</p> <ul style="list-style-type: none"> • Upholding the Right Ethical Standards • Championing Fair Labour Practices • Caring for the Environment • Demonstrating Health and Safety • Showing Transparency Through Reporting and Governance
<p>Third-Party Anti-Corruption Due Diligence Policy</p>	<p>Sets out the process for selecting and engaging Third Parties to mitigate risks and ensure due diligence processes are followed.</p>
<p>Training & Development Policy</p>	<p>Sets out the need to support and equip staff with the appropriate skills, competence, and experience to fulfill their role and future needs of the company.</p>
<p><u>Workplace Health & Safety Policy</u></p>	<p>Provides a set of commitments for Zuellig Pharma to create and sustain a culture of health and safety within the company.</p>

RELATED POLICIES AND DOCUMENTS

(CONTINUED)

STANDARD OPERATING PROCEDURES

<p>Pharmacovigilance Standard Operating Procedures</p>	<p>Guidelines to fulfill Zuellig Pharma Client and regulatory requirements for Pharmacovigilance activities, such as receiving and recording of adverse event reports and submitting these to identified client contacts and local Regulatory Authorities.</p> <p>Details instructions that outline the steps and processes involved in specific pharmacovigilance activities.</p>
<p>Promotional Materials Standard Operating Procedures</p>	<p>Details instructions that outline the guidelines, steps and processes involved in the development of specific promotional material.</p>

SUPPORTING DOCUMENTS

<p><u>Export Controls & Sanctions Requirements</u></p>	<p>Outlines the expectations that service providers and consultants are not liable to sanctions, being investigated for felonies and observe and adhere to export control laws and regulations.</p>
<p><u>Zuellig Pharma Speak Up Communication Channel</u></p>	<p>Speak Up communication channels enables employees and third parties to report any suspected or occurring violations of the Zuellig Pharma Code of Conduct or other Zuellig Pharma policies.</p>
<p><u>Sustainability GRI Report</u></p>	<p>Zuellig Pharma's Sustainability Report outlines the strategy and approach towards sustainability and building a healthier future for Asia. The sustainability report is published on an annual basis.</p> <p>Disclosure of our environmental, social, and governance (ESG) goals, communicating the company's progress and efforts to reach those goals.</p>

GLOSSARY

The glossary serves to provide definitions for specific guidelines and terminology used within Zuellig Pharma's Sustainability Policy.

FRAMEWORKS AND GUIDELINES	ABBREVIATION	DESCRIPTION
CDP	CDP	CDP collects environmental data from companies to help investors assess climate-related risks.
EcoVadis		EcoVadis is a sustainability ratings provider that assesses the environmental and social performance of companies.
Global Reporting Initiative	GRI	GRI provides a framework for sustainability reporting by organisations.
ILO Core Conventions	ILO	These are fundamental labour conventions related to freedom of association, collective bargaining, forced labour, child labour, and discrimination.
ISO9001 Quality Management Systems	ISO 9001	The ISO 9001 standard's purpose is to provide organisation with an ongoing quality management system ⁹
ISO 13485 Medical Devices Management Systems	ISO 13485	The ISO 13485 is designed to be used by organizations involved in the design, production, installation and servicing of medical devices and related services.
ISO 14001 Environmental Management	ISO 14001	The ISO 14001 is an international standard for environmental management systems.
ISO 26000 Social Responsibility	ISO 26000	The ISO 26000 provides guidance on social responsibility for organisations.
ISO 27001 Information Security Management Systems	ISO 27001	ISO/IEC 27001 is an international standard to manage information security
ISO 45001 Health and Safety Management System	ISO 45001	The ISO 45001 is an international standard for managing workplace health and safety.
OECD Guidelines for Multinational Enterprises	OECD	The OECD Guidelines for Multinational Enterprises provides principles and standards for responsible business conduct across international borders.
Pharmaceutical Supply Chain Initiative	PSCI	PSCI is a pharmaceutical industry initiative to enhance supply chain sustainability.

GLOSSARY

(CONTINUED)

FRAMEWORKS AND GUIDELINES	ABBREVIATION	DESCRIPTION
Science Based Targets	SBTi	SBTi helps companies set science-based targets for reducing greenhouse gas emissions.
Transported Asset Protection Association	TAPA	TAPA uniquely unites global manufacturers, logistics providers, freight carriers, law enforcement agencies and other stakeholders to establish leading security standards for the supply chain.
UN Convention Against Corruption	UNCAC	A broad and more comprehensive treaty than the OECD Anti-Bribery Convention, addressing corruption in all its forms, covering both the public and private sectors.
United Nations Global Compact	UNGC	The UNGC is a voluntary initiative that encourages businesses to adopt sustainable and socially responsible policies and practices. The "10 Principles of UNGC" outline principles related to human rights, labour, environment, and anti-corruption.
United Nations Principles on Business and Human Rights	UNGPs	The UNGPs, also known as the "Ruggie Principles," provide a framework for businesses to respect human rights throughout their operations.
United Nations Sustainable Development Goals	SDGs	The SDGs are a set of 17 global goals adopted by the United Nations to address various social, economic, and environmental challenges.
United Nations Universal Declaration of Human Rights	UDHR	The UNHR is a foundational document that sets out universal human rights standards.

TERMS	DEFINITIONS
Anti-Bribery & Corruption	Preventing and combating bribery of foreign public officials in international business transactions (OECD)
Climate Resilience	The process used and outcomes achieved to assess whether effective risk management and adaptation can be implemented and sustained. Usually includes strategies, choices, and actions that reduce climate change and its impacts (IPCC)
Sustainable Procurement or Responsible Sourcing	Specifications, requirements and criteria that are compatible with the protection of the environment and society as a whole. It encompasses many issues beyond, for example, child labor or the use of harmful chemicals that can affect people or the environment (EcoVadis)

VERSION CONTROL

VERSION	AMENDMENT/S	DATE CREATED
1.0	Establish Policy	26 January 2021
2.0	Amendments to Policy	10 May 2024



PARTNER WITH ZUELLIG PHARMA
ON SUSTAINABILITY AND JOIN US IN MAKING
HEALTHCARE MORE ACCESSIBLE FOR ALL.

Reach out to our Sustainability team at sustainabilityteam@zuelligpharma.com if you have any questions about our Sustainability Policy and would like to contribute towards a healthier future for communities in Asia.