



ZUELIG
PHARMA

making healthcare more accessible



SUPPLIER

CODE OF CONDUCT

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MESSAGE FROM CEO

Dear Suppliers,

At Zuellig Pharma, we recognise the vital role that each of our suppliers plays in our mission to make healthcare more accessible to the communities we serve. As we strive to uphold the highest standards of integrity and ethical conduct, the strength and quality of our partnerships are key to delivering seamlessly, for our stakeholders.

Our Supplier Code of Conduct serves as a cornerstone of our commitment to ethical business practices, sustainability and social responsibility. It outlines the principles and expectations we hold for ourselves and our suppliers in the industry. By adhering to this Code, we can collectively ensure that our dealings and operations are conducted with integrity and equity, in compliance with recognised quality management standards.

We value your collaboration and dedication to deliver in line with our Supplier Code of Conduct; to consistently uphold the trust and confidence of our stakeholders.

With that, thank you for your partnership. I am excited about the opportunities ahead and look forward to achieving great success together.



JOHN GRAHAM
CHIEF EXECUTIVE OFFICER
ZUELLIG PHARMA

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INTRODUCTION

Sustainable Procurement is procurement that strives to have a positive environmental, social, and economic impact across the purchasing and supply management lifecycle, whilst upholding company needs for cost efficiency and security of critical supply.

Our Sustainability Vision is to build a healthier future for Asia with our clients, customers, and partners by improving health outcomes, nurturing talent, and respecting the environment, while setting the highest standards of integrity.

OUR PRINCIPLES

- Zuellig Pharma is committed to upholding the highest ethical standards in all aspects of our business. Suppliers are expected to act with integrity and conduct their business in an ethical manner, in compliance with Zuellig Pharma's Code of Conduct and policies and all applicable laws and regulations.
- Suppliers must treat all of their employees with respect and dignity, strictly comply with all applicable labour laws and regulations and promote workplace diversity, equality, and inclusion.
- Suppliers are expected to operate in an environmentally friendly manner, with respect to international guidelines and all applicable environmental laws and regulations. Suppliers shall have programs in place for managing and maintaining all their production processes in accordance with all applicable safety standards and all applicable health and safety laws and regulations.
- Suppliers shall implement adequate actions to facilitate continual improvement and compliance with the expectations of this Supplier Code of Conduct.

We understand that some of our suppliers might not be able to comply fully with all the sustainability principles and standards outlined in this Supplier Code of Conduct and we recognise that this is an ongoing journey. Our pragmatic approach to Sustainability in Procurement involves having a vision of where we need to get to and an action plan on how to get there, while acknowledging that we need to teach ourselves and our supplier base about the importance and advantages of being a sustainable business.

JOINT BENEFITS

- Revenue growth
- Regulatory compliance
- Improve service offering
- Drive innovation
- Enhance brand image
- Environmental compliance
- Competitive advantage
- Community Contributor

OUR OBJECTIVE

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1. Revenue growth
2. Regulatory compliance
3. Improve service offering
4. Drive innovation
5. Enhance brand image



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ETHICAL BUSINESS CONDUCT

Zuellig Pharma is committed to upholding the highest ethical standards in all aspects of our business. Suppliers are expected to act with integrity and conduct their business in an ethical manner, in compliance with Zuellig Pharma's Code of Conduct and policies and all applicable laws and regulations. The Ethical Practices include:

BUSINESS INTEGRITY

Suppliers should work against corruption in all forms, including bribery, fraud, extortion, or embezzlement. Suppliers are expected to comply strictly with Zuellig Pharma's Code of Conduct and policies and all applicable Anti-Corruption laws and shall not offer or accept bribes or other unlawful incentives to/from their business partners or any entity to retain or gain an advantage in obtaining business.

GIFTS, HOSPITALITY & OTHER BENEFITS

In order to maintain our ethical standards and meet our obligation relating to anti-corruption and anti-bribery laws, accepting gifts, hospitality, and other benefits from third parties, including suppliers is prohibited for all Zuellig Pharma employees. This prohibition includes all gifts, including customary/festive gifts, and regardless of value.

IDENTIFICATION OF CONCERNS

Suppliers who believe that a Zuellig Pharma employee, or anyone acting on behalf of Zuellig Pharma, has engaged in illegal or otherwise improper conduct, should report the matter promptly to Zuellig Pharma. Any individual or organisation, who knows or suspects that a Zuellig Pharma supplier, or anyone acting on their behalf, has engaged in activities that violate Zuellig Pharma's Supplier Code of Conduct, should report the matter promptly to their Zuellig Pharma contact or via Zuellig Pharma's Speak Up channel.

Zuellig Pharma maintains a [Speak Up Policy](#) as well as a dedicated, multi-lingual Speak Up channel at www.zuelligpharma.ethicspoint.com. 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. All reported matters are handled confidentially and are reviewed by our Audit committee for appropriate follow-up.



WEBSITE

www.zuelligpharma.ethicspoint.com



EMAIL

zpspeakup@zuelligpharma.com

DEBARMENT

Suppliers must not at any time use in any capacity, in connection with the supply of its good and/or performance of its services, the services of any employee, third party or other person debarred under the US, UN or applicable exclusion or Debarment lists.



FAIR COMPETITION

Suppliers shall conduct their business consistent with fair and vigorous competition and in compliance with applicable anti-trust laws. Partners shall employ fair business practices including accurate and truthful advertising.

TRADE COMPLIANCE

Suppliers must comply with all applicable import and export controls, sanctions, and other trade compliance laws of applicable country(ies) where transaction(s) occur in a legal and ethical manner.

PRIVACY AND INTELLECTUAL PROPERTY

Suppliers shall safeguard personal data, confidential assets, and information to ensure the privacy and intellectual property rights of all employees, clients, and business partners are well protected. This includes protecting Zuellig Pharma's intellectual property and confidential information, as well as any personal information collected, stored, or processed for or from Zuellig Pharma, to prevent its loss, misuse, theft, improper access, disclosure, or alteration. Suppliers are expected to take measures to prevent unauthorized communication and publication of information acquired from or on behalf of Zuellig Pharma.

CONFLICTS OF INTEREST

Suppliers must avoid conflicts of interest in their relationship with Zuellig Pharma and other related business partners. If a Supplier or its employee is in a position which may or appear to be in a conflict of interest with the business relationship with Zuellig Pharma, the Supplier should disclose this to Zuellig Pharma in writing promptly.

ACCURACY OF BUSINESS RECORDS

All financial books and records must conform to generally accepted accounting principles. Records must be complete and accurate in all material respects. Records must be legible, transparent and reflect actual transactions and payments. Suppliers will not use any "off the books" or similar funds.

COOPERATION WITH GOVERNMENT AGENCIES

Suppliers must cooperate with investigating government agencies charged with enforcing compliance as and to the extent required by local laws (including, where permitted, by providing reasonable access to facilities and workers). When required, suppliers must notify the relevant authority if they receive credible information that a worker, contractor or subcontractor has violated local laws.

RESPONSIBLE SOURCING OF MINERALS

Suppliers that engage in manufacturing shall maintain processes and procedures to ensure the responsible sourcing of minerals. Suppliers shall endeavour to avoid the purchase of minerals (e.g., tin, tantalum, tungsten, and gold) that directly or indirectly finance or benefit armed groups or perpetrators of serious human rights abuses. When requested by Zuellig Pharma, partners shall provide information that shows the source and origin of minerals used by the partner.



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LABOUR PRACTICES & HUMAN RIGHTS

At Zuellig Pharma, our people are our most important assets. Suppliers must treat all their employees with respect and dignity, strictly comply with all applicable labour laws and regulations and promote workplace diversity, equity, and inclusion. The Labour Practices include:

ABOLITION OF CHILD LABOUR

Suppliers are expected to adhere to International Labour Organization (ILO) standards in their business operations in fighting any form of child labour. Suppliers are expected to have adequate and verifiable mechanisms for age verification in recruitment procedures.

IN FREELY CHOSEN EMPLOYMENT

Suppliers shall not: (i) use any form of forced or involuntary labour, including bonded labour, prison labour or indentured labour; or (ii) engage in or support any form of slavery or human trafficking. All work must be voluntary, and workers shall be free to leave or terminate their employment at any time. Workers should not face unreasonable constraints on their freedom of movement. They must not be confined to their workplace or associated premises, including residences provided by employers or recruiters. Additionally, no coercive methods should be employed to limit their freedom of movement.

EMPLOYMENT PRACTICES

Suppliers shall only use recruiters (agencies) that comply with local labour laws and are certified or licensed by the competent authority. Suppliers and recruiters acting on their behalf shall not: (i) withhold or prevent a worker from accessing his or her identity or immigration documents, such as passports, work permits or drivers' licenses; or (ii) charge workers recruitment or placement fees or require workers to make deposits or participate in savings programs (unless legally required). When required by Zuellig Pharma, if the supplier has workers who are not nationals of the country in which they perform work, the supplier shall provide return transportation (or pay the cost of the return transportation) at the conclusion of the worker's period of employment.

FAIR TREATMENT & WORKPLACE DIVERSITY

Suppliers must ensure a workplace free of harsh and inhumane treatment, including sexual harassment, abuse, corporal punishment, coercion, or verbal abuse of workers. Suppliers must comply with all laws regarding discrimination, harassment, and retaliation. Discrimination for reasons such as race, colour, gender, age, religion, national origin, ancestry, ethnicity, disability, sexual orientation, gender identity, gender expression, genetic information, citizenship status, marital status, military/veteran status or any other characteristic protected by applicable law will not be tolerated.



SUPPLIER DIVERSITY

Our supplier diversity strategy aligns with our sustainability approach, supporting workplace diversity and extending this ethos to our supplier base. We prioritise cultivating relationships with diverse businesses and developing local suppliers who share our commitment to diversity within their own supply chains. Zuellig Pharma expects suppliers to: (i) employ search and assessment processes that are unbiased and transparent, (ii) ensure that procurement teams proactively grant diverse businesses fair access to bids, and (iii) actively seek out and provide opportunities for diverse suppliers to participate in business ventures, wherever feasible.

WORKING HOURS, WAGES AND BENEFITS

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Suppliers shall clearly and promptly communicate with the worker: (i) the basis on which he or she is compensated; and (ii) whether overtime may be required and the wages to be paid for such overtime.

FREEDOM OF ASSOCIATION

Open communication and direct engagement with workers (and/or designated union officials, if applicable) to resolve workplace and compensation issues is encouraged. Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labour unions, seek representation, and join workers' councils. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation, or harassment.

PRIVACY & DATA PROTECTION

Suppliers shall respect individuals in a manner consistent with the rights to privacy and data protection. They shall at all times use information about people appropriately for necessary business purposes and protect it from misuse in order to prevent harm to individuals such as discrimination, stigmatization or other damage to reputation and personal dignity, impact on physical integrity, fraud, financial loss or identity theft.



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RESPECTING THE ENVIRONMENT

Suppliers are expected to operate in an environmentally friendly manner, with respect to international guidelines and all applicable environmental laws and regulations. Elements of Environmental Practices include:

ENVIRONMENTAL AUTHORISATIONS

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

WASTE AND EMISSIONS

Suppliers are encouraged to undertake initiatives to promote greater environmental responsibility. Suppliers must have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater, or emissions with the potential to adversely impact human or environmental health must be appropriately managed, controlled and treated prior to release into the environment.

SPILLS & RELEASES

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

RESPECT FOR THE ENVIRONMENT

Suppliers are responsible to protect the environment and encouraged to commit to the protection of the environment as part of every decision they make. The goal is to avoid any situation that may lead to unacceptable environmental or health hazards for employees, the public, or the environment in general.

PARTNERING FOR INNOVATION

Suppliers are encouraged to participate in the development of environmentally friendly technology. We encourage and seek business partnership with suppliers in areas of improving efficiency, reduce, reuse, recycle initiatives, and of product design, energy conservation and sustainability.

COMMITMENT TO CLIMATE CHANGE

Suppliers are expected to conserve natural resources and engage in activities aimed at reducing water usage, energy consumption and greenhouse gas emissions. Suppliers shall have systems in place to quantify the amount of water used, energy consumed, and greenhouse gases emitted by their operations.



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HEALTH, SAFETY & WELLBEING

Suppliers shall have programs in place for managing and maintaining all their production processes in accordance with all applicable safety standards and all applicable health and safety laws and regulations. Elements of Health and Safety Practices include:

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 in any company-provided living quarters. Suppliers will also provide appropriate controls, safe work procedures, preventative maintenance, and necessary technical protective measures to mitigate health and safety risks in the workplace. Suppliers shall not isolate workers from their communities or prevent them from communicating with family and friends.

HAZARD INFORMATION

Safety information relating to hazardous materials – including pharmaceutical compounds and pharmaceutical intermediate materials – shall be available to educate, train, and protect workers from hazards.

PROCESS SAFETY

Suppliers shall have programs in place for managing and maintaining all their production processes in accordance with the applicable safety standards. Suppliers will address product-related issues and their potential impact during all stages of the production process as well as the transportation process. In scenarios relating to hazardous installations, the suppliers will conduct specific risk analysis and implement measures that prevent the occurrence of incidents such as chemical releases and/or explosions.

EMERGENCY PREPAREDNESS & RESPONSE

Business partners shall identify and assess emergency situations in the workplace and any company-provided living quarters and minimize their impact through prevention and by implementing emergency plans and response procedures.

HOUSING STANDARDS

Suppliers that provide housing or living accommodations for workers will ensure that local (in-country) housing and safety standards are met.



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GOVERNANCE

Suppliers shall implement adequate actions to facilitate continual improvement and compliance with the expectations of this Supplier Code of Conduct. Elements include:

DOCUMENTATION

Suppliers are expected to demonstrate commitment to the concepts described in this Supplier Code of Conduct by implementing an appropriate and auditable reporting and documentation system. Suppliers shall present this documentation to Zuellig Pharma as evidence of complying with applicable policies and regulations. The documentation can be in the form of an annual report or in checklist format. Zuellig Pharma will share our documentation system format and detail with suppliers, based on the type of product and service we purchase. Suppliers deemed critical and/or material to our business will be proactively engaged in an in-depth evaluation of required controls and assessment of their Sustainability improvement programs.

LEGAL PRINCIPLES

Suppliers shall identify and comply with applicable laws, regulations, standards and relevant requirements of Zuellig Pharma and our clients and customers. Zuellig Pharma reserves the right to exclude suppliers whose practices, policies or procedures do not conform to the standards outlined in this policy or who are not willing to demonstrate good-faith efforts on the path of improvement. Suppliers who are deemed material to Zuellig Pharma may be engaged in an in-depth assessment and an evaluation of compliance to this Supplier Code of Conduct.

TRAINING AND COMPETENCY

Suppliers shall have training programs that provide management and workers with the knowledge and skills needed to address the expectations set forth in this document. Suppliers must also ensure that management and workers have the necessary qualifications, resources, and authority to meet these expectations.

ACCURATE RECORDS

Documentation must be made available to Zuellig Pharma or its designated auditor to inspect upon request, demonstrating compliance to these standards. Records must be legible, transparent and reflect actual transactions and payments. Suppliers shall not hide, fail to record, or make false entries.

RISK ASSESSMENT & RISK MANAGEMENT

Suppliers shall have mechanisms to assess and manage risks in all areas addressed by this document.

SUPPLIER SELECTION & MONITORING

Suppliers shall apply the principles outlined in this document when selecting their own partners and suppliers. Suppliers shall have or put in place systems to monitor their supplier and subcontractor compliance.

BUSINESS CONTINUITY

Suppliers are responsible for the development and implementation of appropriate business continuity plans for operations supporting Zuellig Pharma's business.





This Supplier Code of Conduct has been reviewed and approved by the Regional Head of Procurement and is applicable to all of Zuellig Pharma's suppliers, including individuals or organisations that provide transportation services, temporary labour, consulting and professional services, IT hardware and servers, packaging, construction, leases, material handling equipment, and office supplies or other products or services to Zuellig Pharma and its operating subsidiaries, affiliates, and divisions.

This May 2024 version supersedes all existing versions.

VERSION CONTROL

DATE	May 2024
VERSION	5
ISSUED BY	Regional Head of Procurement

If you have any questions about our Supplier Code of Conduct or if you would like to work with us, please reach out to our Procurement team at procurementsustainability@zuelligpharma.com.