



# SUPPLIER CODE OF CONDUCT

## Our Purpose

We are pioneering healthcare to improve the life of millions of patients worldwide

We, at Tiefenbacher Group, are driven by a deep sense of purpose: since 1963 we are pioneering healthcare to improve patients' lives around the world. We believe that there are always ways to make pharmaceuticals more affordable, more available and better than before.

This belief drives our curiosity and inspires us to continuously challenge the status quo. We love to pave new ways and to push frontiers to make a meaningful impact on patients' lives. By working together as one Tiefenbacher Group and building bridges across disciplines and diverse teams, we unlock our collective potential and continue to stay ahead. Our purpose has a deep and enduring value for us. It is our reason to come to work every day and reminds us why we exist as a company – to shape a healthier tomorrow.



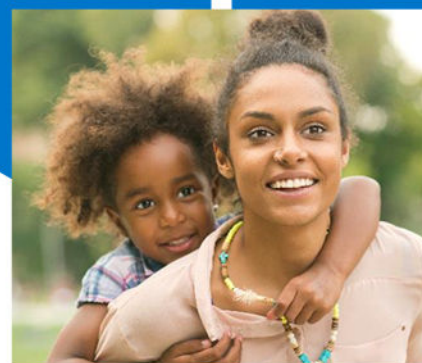
### Better Affordability

of high-quality medicines



### Better Availability

throughout the world



### Better Therapies

for patients

**BETTER FOR PEOPLE  
AND OUR PLANET**



# Corporate Responsibility at Tiefenbacher Group

Improving patients' lives through sustainable business

We, at Tiefenbacher Group, know that our responsibility as a global healthcare company goes beyond medicine. We understand sustainability as behaving responsibly towards society and our planet – in our day-to-day work. Being commercially successful and operating responsibly is how we will generate sustainable returns. By creating innovative high-quality medicines with broad access to patients around the world and providing a safe and rewarding workplace we can use our business to build a better tomorrow.

We guarantee highest quality standards for our products and processes and ensure that Tiefenbacher Group acts in compliance with applicable regulations, laws, policies, and guidelines. We promote ethical and trustful behavior by all employees of Tiefenbacher Group.

Furthermore, we strive to make efficient use of natural resources, to minimize the environmental impact of our operations, and to invest in environmental solutions that drive a circular economy. We also care about our society – especially in the countries where our company operates. Our caring culture is fundamental to achieve our purpose to make life significantly better for people around the world.



## Environment

Ambitious climate target with our own solar energy, green energy, electrification, and a responsible high-quality emission reduction project in India



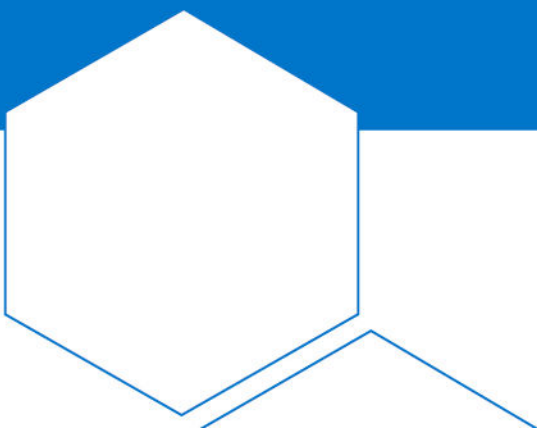
## Social

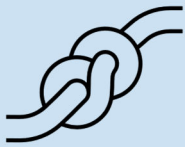
Beyond health and safety, diversity, equality and growing people, driving several social projects (e. g. school building in India and support of Pharmacists without Borders)



## Governance & Business Ethics

Ethical and trustful behaviour by all employees and taking care of human and labour rights as well as environmental aspects in our supply chain





## Supplier Code of Conduct

### Our Goal

We, at TIEFENBACHER GROUP, are driven by a deep sense of purpose: we are pioneering healthcare to improve patients' lives around the world. Our purpose ties us together as a company and drives us to deliver better healthcare to people with our products and services.

We guarantee the highest quality standards for our products and processes and ensure that TIEFENBACHER GROUP acts in compliance with applicable regulations, laws, policies, and guidelines. Accordingly, we promote the societal and environmental values outlined in the United Nations Global Compact, the UN Children's Rights and Business Principles, the United Nations Guiding Principles on Business and Human Rights, ILO Conventions, the Treaty on the Functioning of the European Union (TFEU), the UN Framework Convention on Climate Change, the UN Convention against Corruption and other international standards, as a mandatory guideline to our suppliers.

### Scope of Application

The TIEFENBACHER GROUP Supplier Code of Conduct (the "Supplier Code of Conduct") is based on the aforementioned legislation and as a member of the Pharmaceutical Supply Chain Initiative ("PSCI"), it aligns with the principles of the PSCI, covering ethics, human rights, labor rights, health and safety, environment, and associated management systems.

We aim to use this Supplier Code of Conduct as the basis for agreements under revision and future agreements and it shall be part such agreements with all suppliers and entities providing goods and services to TIEFENBACHER GROUP, thereby imposing legal obligations to guarantee compliance with all specified requirements in this Code.

Suppliers pledge to take all necessary measures to ensure the implementation of the standards and regulations specified in this document in accordance with the provided specifications and bear the responsibility of ensuring that their employees, agents, and subcontractors are in a clear and understandable manner and do not infringe upon the standards set forth in this code.

## **Anti-Corruption/Anti-Bribery**

Suppliers shall conduct their business in an ethical manner and act with integrity.

Suppliers are required to carry out their business operations responsibly, abstaining from any form of corruption, such as extortion, bribery, unfair competition, or fraudulent business practices and comply with relevant antitrust and unfair competition laws and regulations.

Accordingly, suppliers are prohibited from making or accepting bribes or engaging in any other illicit inducements in their business or government interactions, whether directly or through third parties or intermediaries. They are expected to uphold fair business practices, which encompass truthful and accurate advertising and they should ensure that employees in roles with elevated risks of corruption receive training in anti-corruption standards.

Additionally, TIEFENBACHER GROUP expects its suppliers and service providers to avoid situations that may create a conflict between their interests and their obligations to TIEFENBACHER GROUP. Supplier shall disclose any conflicts of interest that could have an influence on the contractual relationship immediately with TIEFENBACHER GROUP without being asked to do so and before the contract is concluded.

## **Human Rights and Labor**

We operate our business responsibly, adhering to the highest ethical standards that include respect for human rights, both within our own operations and across our supply network. Suppliers are expected to maintain ethical labor practices and procedures.

### **Child Labor**

Under no circumstances should suppliers employ or utilize children in any form of labor within any segment of the value chain, including sub-suppliers and contractors. The minimum age for employment must not be lower than the age of completing compulsory schooling and, in any case, should not be less than 15 years (or 14 years where permitted by national laws following the ILO developing-country exception). Robust age-verification mechanisms should be integrated into recruitment processes to prevent child labor.

Suppliers are required to refrain from hiring young employees below the age of 18 for tasks prohibited for young employees by law or that could jeopardize their health, safety, and/or morals.

### **Forced Labor**

The employee has the free choice of his employer. Suppliers are obligated to guarantee the absence of forced, bonded, or involuntary labor in any activities conducted under their collaboration with TIEFENBACHER GROUP. Suppliers are prohibited from mandating employees to lodge identity papers or similar deposits with their employer. Every worker should have the freedom to separate from their employer in compliance with the statutory notice periods.

Furthermore, all employees employed by suppliers and their sub-suppliers must possess a legal right to work, and this must be verified through the examination of original documentation.

## **Abuse**

Suppliers are required to prohibit physical, verbal, sexual, or psychological harassment, abuse, or threats in the workplace. This prohibition extends to the determination and implementation of disciplinary measures, which must never be collectively imposed.

## **Working Hours**

Suppliers must ensure that working hours adhere to the applicable laws of the country or industry standards. Overtime is only permissible if it is undertaken voluntarily. Employees are entitled to a weekly rest period of at least twenty-four consecutive hours within each seven-day period.

## **Non-Discrimination and Equal Opportunities**

Suppliers are required to eradicate discrimination, which includes any differentiation, exclusion, or preference based on race, color, sex, language, religion, political opinion, caste, national or social origin, property, union affiliation, sexual orientation, health status, age, disability, or other distinguishing characteristics. Employment-related decisions must be grounded in relevant and objective criteria.

## **Income**

All employees must be provided with a written, comprehensible, and legally binding labor contract or similar employment documentation in accordance with local legal standards. Additionally, suppliers shall guarantee that wages, benefits, and overtime compensation must, at a minimum, adhere to national legislation and industry standards and employees should be adequately informed about their wages and pay periods in a clear and easily understandable format.

Compensation for regular working hours should always be sufficient to cover basic needs and allow for some discretionary income. In instances where deductions from wages are considered as a disciplinary measure, such deductions are only permitted under conditions and to the extent regulated by law or collective agreement.

## **Freedom of Expression**

Employees have the right to openly discuss their working conditions, compensation, and other relevant matters with their supervisors, free from any fear of reprisals, intimidation, or threats.

Suppliers are required to guarantee that employees have the right to join or form trade unions of their own choosing and acknowledge the right to engage in collective bargaining. Discrimination against representatives of employees based on their functions in the workplace is prohibited, and suppliers must ensure that these representatives have access to fulfill their representative functions.

## Health and Safety

Suppliers are required to furnish a safe and hygienic working environment, taking appropriate measures to prevent accidents and injuries to health by minimizing hazards in the working environment to the extent reasonably practicable. Suppliers must, at a minimum, adhere to the basic standards outlined by national and local laws and regulations concerning the work environment.

Regular and documented health and safety training must be provided to all employees, and suppliers are responsible for supplying necessary protective equipment to ensure safe task performance.

Adequate access to clean toilet facilities, potable water, and, if applicable, sanitary facilities for food storage must be provided. In cases where accommodation is provided by TIEFENBACHER GROUP, it should be clean, safe, and fulfill the basic needs of the employees.

## Environment

Suppliers are expected to conduct their operations in an environmentally responsible manner, aiming to minimize adverse environmental impacts and comply with the environmental laws and regulations in force in the countries where they operate. Suppliers must hold all legally required permits, licenses, certificates and/or approvals for the operation of its sites in accordance with the requirements associated with such.

Suppliers are required to consistently enhance their environmental performance and take actions to address climate change. This involves implementing initiatives that foster greater environmental responsibility and embracing environmentally friendly technologies. Continuous improvement in these aspects is expected from suppliers and they are encouraged to actively engage in the conservation of natural resources, refrain from using hazardous materials, and emphasize practices such as reducing, reusing, and recycling.

On their sites, suppliers must evaluate the detrimental impacts of their operations, products, and services. This assessment should be conducted through continuous monitoring and regular reviews of resource consumption and discharge, encompassing energy, fuel, electricity, water, and greenhouse gas emissions. Accordingly, suppliers must establish waste and emissions systems to ensure safe handling, movement, and storage/disposal of all wastes, including assessment, management, control and treatment for any waste, wastewater or emissions, with potential adverse impacts on humans or the environment.

Environmental considerations must be integrated throughout the entire production and distribution chain, spanning from the production of raw materials to the sale of end-user



products. This includes proper storage, transportation, disposal in safe and licensed facilities, or recycling. The suppliers shall acknowledge and adhere to the prohibitions on the export of hazardous waste outlined in the Basel Convention of March 22, 1989, as amended.

Chemicals or materials with environmental hazards shall be identified, and their handling must prioritize safety throughout the entire lifecycle, including transportation, storage, usage, recycling or reuse, and disposal. The usage of mercury shall comply with the prohibitions stated in the Minamata Convention of October 10, 2013. Additionally, persistent organic pollutants shall be managed in accordance with the regulations outlined in the Stockholm Convention of May 23, 2001, as amended.

## **Animal Welfare**

When animal testing is necessary, suppliers shall minimize the number of animals used for testing. Suppliers that involve animal usage are required to uphold the highest ethical and welfare standards, covering aspects such as quality, housing, husbandry and veterinary care. Animal testing or any form of animal use, including production-related activities, should employ accepted and state-of-the-art methods with a focus on minimizing pain. Additionally, all options for the replacement, refinement, and reduction (3R) of testing must be thoroughly considered before proceeding.

Whenever feasible, alternatives to animal-based methods should be prioritized. For all forms of animal usage, suppliers must implement proper 3R practices, environmental enrichment, hygiene, and health monitoring programs. Furthermore, robust processes and procedures for incident and risk management must be established and adhered to.

Animal-using suppliers are required to possess knowledge of and adhere to the policies and standards set by the Animal Science and Welfare group. Compliance with European Convention ETS123 Appendix A, the latest edition of the U.S. ILAR Guide, and local legislation is mandatory.

## **Implementation of the Supplier Code of Conduct**

TIEFENBACHER GROUP expects its suppliers to identify risks in their own business areas and to take appropriate measures. Upon request from TIEFENBACHER GROUP, suppliers shall document compliance with all obligations set out in this Supplier Code of Conduct.

Suppliers agree to permit TIEFENBACHER GROUP to conduct audits annually or for specific reasons to verify compliance with this Supplier Code of Conduct on their premises. These audits will take place during normal business hours, and reasonable advance notice will be provided by individuals or companies appointed by TIEFENBACHER GROUP.

Suppliers are required to establish a transparent system for employees and stakeholders to confidentially report and submit complaints regarding violations of this Supplier Code of Conduct. The process for submitting reports and complaints should be easily accessible and ensured without any fear of reprisals toward the reporter or complainant.



In the event of identified instances of non-compliance with the requirements outlined in this Supplier Code of Conduct, suppliers are obligated to take corrective action to remedy the problem and to notify TIEFENBACHER GROUP in writing immediately. Additionally, measures should be implemented to prevent similar problems from recurring in the future.

Any breach of the Supplier Code of Conduct may serve as sufficient grounds for TIEFENBACHER GROUP to terminate the business relationship, including all associated contracts.

### Approved

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| <b>by: Oliver Schrader, Managing Director</b><br><b>Signature:</b>  | <b>by: Dr. Kristian Ruepp, Managing Director</b><br><b>Signature:</b>        |
| <b>by: Vakis Frangos, Managing Director</b><br><b>Signature:</b>    | <b>by: Dr. Panayiotis Miltiadou, Managing Director</b><br><b>Signature:</b>  |
| <b>by: Swapnil Singh, Managing Director</b><br><b>Signature:</b>  | <b>by: Sandip Tarate, COO</b><br><b>Signature:</b>                         |

We hereby acknowledge this Supplier Code of Conduct and undertake to comply with it.

|                  |               |
|------------------|---------------|
| Name             | Function      |
| Date / Signature | Company stamp |