

Norgine Supplier Code of Conduct

Norgine is a leading European specialist pharmaceutical company that has been bringing transformative medicines to patients for over a century. Our commitment to transforming people's lives drives everything we do, and our European experience, fully integrated infrastructure and exceptional partnership approach enable us to quickly apply creative solutions to bring life-changing medicines to patients that they may not otherwise be able to access.

Norgine has a direct presence in 16 European countries, as well as Australia and New Zealand. We also have a strong global network of partnerships in non-Norgine markets. We are a flexible and fully integrated pharmaceutical business, with manufacturing (Hengoed, Wales and Dreux, France), third party supply networks and significant product development capabilities, in addition to our sales and marketing infrastructure. This enables us to acquire, develop and commercialise specialist and innovative products that make a real difference to the lives of patients around the world.

Norgine is committed to acting with ultimate integrity across all of its business operations. Compliance with this high standard of integrity, and with all financial, legal, ethical, social and governance compliance principles which Norgine holds itself to, is also expected from all of our external partners. **Our suppliers are an integral part of this commitment.**

All potential suppliers go through a qualification process to ensure they meet Norgine's values and expectations and that our suppliers promote these responsibilities through their own supply chain. This Supplier Code of Conduct is shared to ensure a mutual understanding of our requirements.

By accepting our Supplier Code of Conduct, our Suppliers acknowledge and confirm that they will adhere to and comply with these principles for all existing and future business relationships with Norgine, regardless of location or activity. This Supplier Code of Conduct is to be read in conjunction with our Compliance Policies, available at <https://norgine.com/compliance>, as well as any agreement with Norgine.

Norgine expects all of our suppliers to:

- Operate in full compliance with all applicable laws, regulations, guidelines and codes of practice.
- Communicate and apply these principles in their own third party supply chains.
- Recognize that the applicable law is not replaced by the Supplier Code of Conduct.
- Understand and comply with this Supplier Code of Conduct and policies or positions stated herein.
- Maintain necessary documentation to demonstrate such compliance.
- Report any gaps in compliance with this Supplier Code of Conduct, any event that affects such compliance or any other events potentially affecting Norgine, Norgine's products and/or suppliers' compliance with any applicable Supply Agreements or Quality Technical Agreements with Norgine.
- Communicate any significant inspection or regulatory issue with national or international health authorities to Norgine immediately.
- Allow Norgine or our authorized representative to conduct necessary audits of facilities, systems and/or documents related to the content of this Supplier Code of Conduct and in the case of non-compliance Norgine reserves the right to demand corrective measures and/or terminate its business relationship and related contract(s) with the Supplier.

Compliance, Ethics and Operational Excellence are fundamental to our operations and relationships

Compliance Laws

Norgine maintains a **zero-tolerance** policy with respect to Compliance Laws. Our suppliers must comply with all applicable laws in the territories in which we and they operate: “Compliance Laws” means Anti-Corruption Laws, Anti-Facilitation of Tax Evasion Laws, Anti-Money Laundering Laws, Anti-Trust Laws, Fraud; Data Protection Laws, Trade Control Laws and Modern Slavery and Human Trafficking Laws.

Suppliers shall not engage, or attempt to engage, in any form of bribery or corruption, transaction or activities which you know or suspect constitute bribery or corruption, money laundering, fraud, tax evasion, or engage in any other activity that might lead to a violation of any Compliance Laws (either directly or through any sub-contractors, distributors, agents, advisers, consultants or any other business partners), or threaten or retaliate against another individual who has refused to commit a Compliance Law violation or who has raised concerns;

Engaging in transactions or activities which you know or suspect constitute a breach of Compliance Laws is strictly prohibited.

Gifts, Meals, Entertainment

Suppliers doing business with or seeking to do business with Norgine are not prohibited from giving or receiving normal and appropriate gifts and hospitality consistent with applicable laws, regulations, customs and practices.

Norgine Personnel may give/receive gifts and hospitality to/from third parties only if **all** of the requirements (as applicable) as stated in the in the Norgine Anti-Bribery & Corruption Policy are met.

Anti-Trust & Fair Competition

We support free, robust, and open competition, promoting and encouraging fair competition. All Norgine companies abide by the antitrust and competition laws of the countries in which they operate.

All Suppliers shall conduct their business in accordance with all applicable antitrust laws.

Raising a Concern

Norgine has adopted a formal Whistleblowing Policy. The purpose of the policy is to encourage Norgine and third parties to report a known or suspected wrongdoing or if they wish to raise a concern.

Relevant wrongdoing may include criminal activity, failure to comply with any legal obligation, regulatory requirements, or any applicable code of conduct in the pharmaceutical industry, miscarriages of justice, danger to health and safety, damage to the environment, bribery, facilitating tax evasion, financial fraud or mismanagement, breach of our internal policies and procedures and unauthorised disclosure of personal data or confidential information. The Whistleblowing Policy provides further guidance as to how to raise those concerns.

Suppliers shall encourage all of its employees and subcontractors to report concerns or illegal activities without threat of reprisal, intimidation, or harassment.

Privacy

Norgine is fully committed to safeguarding personal data and ensuring compliance with applicable laws and regulations governing our operations. We aim to process personal data in the most lawful, ethical and transparent manner. In turn, and in line with EU/UK GDPR, Norgine requires its Suppliers to

demonstrate that it has successfully implemented the appropriate technical and organisational measures to protect the personal data it has been entrusted with.

Trade Controls

Norgine takes Trade Controls compliance seriously, and we are committed to complying with Trade Controls in all jurisdictions in which Norgine operates while implementing and enforcing effective systems and controls to mitigate the risk of any Trade Controls violations.

Norgine's Trade Controls Policy must be communicated to, and a copy of the Policy must be shared with, third parties at the outset of our business relationship with them and as appropriate after that.

Considering Norgine's presence in the European Union ("EU"), Switzerland ("Swiss") and the United Kingdom ("UK"), as well as United States ("US"), Norgine is required to comply with, but not limited to, EU, Swiss, UK and US (including UN) sanctions in its activities.

Suppliers must comply with all applicable import and export control laws, regulations, and sanctions, including but not limited to import, export, re-export, transfer or disclosure.

Accurate Reporting & Record Keeping

To ensure transparency for all and to accurately monitor performance we are committed to accurate record keeping and comply with all relevant laws and regulations governing record keeping, accounting and reporting.

Labour & Human Rights

Equal opportunities

Suppliers must promote an inclusive and equal workplace free from any kind of discrimination based on age, disability, gender, gender reassignment, marital status, pregnancy, maternity leave, race including colour, nationality, ethnic or national origin, religion or belief, sex and sexual orientation, or any other protected characteristics as defined under applicable law.

Fair Treatment

Suppliers must provide their employees with a workplace free of harsh and inhumane treatment, without any sexual harassment, sexual abuse, physical punishment, or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment. Furthermore, suppliers are expected not to unfairly terminate any employment contract or without clear evidence specifying that the termination of an employment contract occurred due to the working performance of an employee, as permitted by law.

Modern Slavery

Our responsibility to respect human rights extends throughout our operations, from laboratory to patient.

We take a **zero-tolerance approach** to any form of modern slavery or human trafficking in our supply chains and in any other part of our business.

Freely Chosen Employment

Suppliers shall not use forced, bonded or indentured labour or involuntary prison labour or any other kind of forced labour. Employees will not be required to surrender their passports or other legal documents or pay a fee to an employer before commencing work.

Child Labour and Young Workers

Suppliers shall not use child labour. Child Labour is defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.

Wages, Working Hours & Benefits

Suppliers shall pay workers in a timely manner and according to applicable laws, including minimum wages, overtime hours, prohibition on excessive overtime and mandated benefits.

Freedom of Association

Suppliers shall respect the rights of workers, as set forth in local laws, and the freedom for all workers to create their own bodies of representation or trade unions in whatever form they decide without threat of reprisal, intimidation, or harassment.

Health & Safety

Norgine expects its suppliers to ensure that the health, safety and welfare at work of their employees, contractors and visitors. Suppliers have a duty of care for their own safety and that of others who may be affected by their acts or omissions. Identified health and safety risks should have adequate safeguards in place to manage and mitigate, this should be supplemented by providing appropriate information, instruction, training and supervision when employees are conducting workplace activities.

Product Safety

Suppliers must comply with all product safety regulations, label products properly and communicate product-handling requirements. They shall provide all applicable documentation containing all safety-relevant information for all hazardous substances in case of a legitimate need. This includes product information, safety data sheets, notification, or registration confirmations, uses and exposure scenarios. Suppliers must proactively and transparently communicate information regarding the health, safety, and environmental aspects of their products with all relevant parties.

Product Quality & Supply Chain Integrity

Suppliers involved in the supply, manufacturing, packaging, re-packaging, testing, storage and distribution of materials/ API's/ excipients/ packaging materials/ products; or GxP services on behalf of Norgine will ensure compliance with applicable quality regulations and Good Manufacturing Practice, Good Distribution Practice, Good Control Laboratory Practice; Good Vigilance Practice; GxP requirements for the markets in which the products are manufactured, registered and distributed.

Furthermore, suppliers shall ensure the integrity of their supply chain, avoiding counterfeiting and adulterations to protect patients and products (WHO; EU Falsified Medicine Directive; US Drug Quality and Security Act).

Environment

Norgine is committed to reducing the impact of its operations upon the environment and expects its suppliers to do the same. Suppliers are required to comply with all applicable environmental laws, directives and regulations and to report any environment incidents or conditions that may result in violation of environmental laws, directives or regulations or have a material adverse effect on the environment.