



## SUPPLIER CODE OF CONDUCT

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## Table of Contents

1. Introduction.....	2
2. Labor.....	2
2.1. Child labor.....	2
2.2. Forced labor.....	2
2.3. Violence and harm.....	2
2.4. Discrimination.....	2
2.5. Working hours.....	3
2.6. Wages and fringe benefits.....	3
2.7. Freedom of association.....	3
3. Health and safety.....	3
3.1. Workers' health and safety.....	3
3.2. Hazard information and training.....	3
3.3. Emergency preparedness and response.....	4
4. Environment.....	4
4.1. Compliance with legal and regulatory requirements.....	4
4.2. Climate Change.....	4
4.3. Emissions in the Environment (Air, Water, Soil).....	4
4.4. Pollution prevention.....	4
4.5. Resources management.....	4
5. Business ethics.....	5
5.1. Measuring procedures, tools and indicators.....	5
5.2. Compliance assessment.....	5
6. Privacy & Data Protection.....	5
6.1. Cyber Security.....	6
6.2. Measuring procedures, tools and indicators.....	6
6.3. Trainings.....	6
6.4. Compliance assessment.....	6
7. Useful Links.....	6

## 1. Introduction

By subscribing to the United Nations Global Compact, EUROAPI has pledged to support and apply its fundamental principles in the areas of human rights, working conditions, environment and fight against corruption.

EUROAPI wishes to partner with all its suppliers to share the values of the company.

This supplier code of conduct is part of the responsible procurement approach of the EUROAPI Group and a key element of its vigilance plan.

It commits the supplier to strictly observe and comply with all the fundamental principles expressed herein, in all its activities and sites worldwide.

Suppliers are also expected to ensure their own suppliers comply with these requirements.

Respect of this code of conduct by the suppliers will determine both the onboarding and the continuing commercial relationship between the suppliers and EUROAPI.

Repeated or severe violation of the Supplier Code of Conduct will damage future cooperation with EUROAPI.

EUROAPI expect its suppliers to follow the requirements that are outlined in this Supplier Code of Conduct and to work actively to ensure that they are implemented effectively in their organization. Suppliers who fail to ensure that the conditions and requirements outlined in this document are implemented shall find that their cooperation with EUROAPI affected.

## 2. Labor

Suppliers are expected to comply at least with international human rights treaties, without prejudice to more favorable national laws. In particular, the observance of ILO (International Labor Organization) fundamental conventions by suppliers is an essential requirement for EUROAPI.

They include the following aspects:

### 2.1. Child labor

Suppliers are not engaged in or not support any forms of child labor, do not employ person under the age of 15 (or under the local legal age for finishing compulsory schooling) or person under the age of 18 for hazardous work.

### 2.2. Forced labor

Suppliers are not engaged in nor support worker exploitation amounting to forced labor. They give employees the right to enter into employment voluntarily and freely, without the threat of penalty and the right to freely terminate employment voluntary by means of notice of reasonable length at any time and without penalty. They ensure that all employment contracts are written and transparent and include comprehensive provisions for employees.

### 2.3. Violence and harm

Suppliers will respect the physical or psychological integrity of persons and will not tolerate any practice such as inhuman treatments, physical punishments, insults, harassment, mental or physical coercion.

### 2.4. Discrimination

Suppliers do not tolerate any forms of discrimination and treat all its employees equally, regardless of any characteristics other than their ability to do their jobs. It must consider that qualifications, skill and experience are the basis for the recruitment, placement, training and advancement at all levels.

Suppliers must offer decent working conditions to their employees, and particularly in terms of:

### 2.5. Working hours

Suppliers must respect working time in accordance with national legislation.

### 2.6. Wages and fringe benefits

Suppliers guarantee that wages are paid regularly and allow employees and their family to meet their basic needs.

### 2.7. Freedom of association

Suppliers recognize that all employees are free to form and/or join a workers' organization of their own choice and does not interfere with this right. They prohibit any intimidation, harassment, punishment or discrimination against employee due to trade union activities and do not discourage employee from joining organizations of its own choosing. They respect the right to collective bargaining and the role of workers' organizations for the purpose of collective bargaining and it commits to bargain in good faith.

They allow workers organizations to act entirely independently, by giving them reasonable access to the information, resources and means necessary to accomplish their missions.

## 3. Health and safety

Suppliers provide a safe and healthy working environment for all employees and contractors working at their sites and if applicable healthy living quarters.

That includes compliance with the applicable local and national regulations.

### 3.1. Workers' health and safety

Suppliers shall protect workers, contractors, visitors from any accidents or occupational diseases.

Suppliers shall have programs to identify, assess and manage processes safely in order to prevent:

- physical hazard (electricity, fall...)
- occupational over-exposure to chemicals, pharmaceutical compounds,
- biological agents, stress...
- catastrophic events (chemical release, explosion, fire...)
- major business interruption

Suppliers shall operate and maintain its buildings, operations, equipment in the safest manner possible.

For the most hazardous processes, the supplier shall conduct specific risk analyses in order to implement measures avoiding damage inside and/or outside the site.

### 3.2. Hazard information and training

Safety information for any identified workplace risks shall be made available to inform and train workers to protect them from the risk.

This includes safety information about hazardous substances used: chemicals, active pharmaceutical ingredients, intermediates products.

### 3.3. Emergency preparedness and response

Suppliers shall identify and assess possible emergency situations in the workplace or living quarters and minimize their impact inside/outside the site by implementing safety barriers, emergency response plans and procedures.

## 4. Environment

Suppliers ensure that programs are in place at all their sites in order to minimize the use of hazardous substances and ensure to operate their sites and activities in an environmentally responsible and efficient manner to minimize adverse impact on the environment.

### 4.1. Compliance with legal and regulatory requirements

Suppliers ensure compliance with all the applicable local, national, regional and international (when applicable) regulations relating to environmental protection within the countries where they carry out their activities.

All required environmental permits, licenses and chemical registrations shall be obtained and kept up to date. Their operational and reporting requirements shall be followed.

### 4.2. Climate Change

Supplier measure and report their carbon footprint and greenhouse gases emissions and pledge to voluntarily reduce them.

### 4.3. Emissions in the Environment (Air, Water, Soil)

Suppliers do their best efforts to reduce and even prevent emission generated by their activities.

Any waste, wastewater discharge or air emissions with potential to adversely impact human or environment health shall be appropriately managed, measured, controlled and treated prior to release into the environment.

The traceability of these discharges or disposal is assured.

The waste management shall favor waste prevention, reduction, recycling or recovery of waste and use of recovered materials as often as possible.

Suppliers shall evaluate and minimize the environmental impacts of its pharmaceutical substances from manufacturing activities.

### 4.4. Pollution prevention

Suppliers make sure that all the substances presenting an environmental risk are identified, labelled, stored, handled and shipped in a manner that prevents and mitigates accidental spills and releases to the environment.

A prevention plan and emergency preparedness plan are in place to treat any chronic or accidental event presenting an environmental risk (air, soil, water and groundwater) inside or outside the site.

### 4.5. Resources management

Suppliers do their best to reduce their energy and water consumption in order to preserve natural resources.

Suppliers preserve biodiversity locally in its sites and indirectly, through their purchased raw material policy.

## 5. Business ethics

EUROAPI is engaged in fostering an ethical culture aiming at reaching the highest standards in terms of responsibility and business integrity. When selecting suppliers or services providers, EUROAPI is looking for much more than a source of goods or services. It seeks to build a relationship based on trust with business partners that understand and share the same values and ethical principles as EUROAPI.

Therefore, EUROAPI requires that all suppliers and service providers:

- Respect the highest ethical standards in all their activities with EUROAPI but also all applicable national and international laws and regulations regarding the prevention of and fight against bribery and corruption. This commitment must be extended, by suppliers or services providers, to all the third parties to whom they may subcontract all or part of their tasks or services for EUROAPI.
- Declare any conflict of interest that may affect the performance of tasks or provision of services entrusted to them by EUROAPI. Because EUROAPI's decision must solely be based on the performance and quality of the products and services supplied and not on any form of hidden benefit or conflict of interest.
- Refrain from proposing to EUROAPI employees any sum of money, gifts, loans, rebates, valuable objects. Please note that EUROAPI employees are not authorized to receive gifts other than token gifts intended to promote your company or your products or services (max. value 5 euros or equivalent) and cannot accept invitation to social activities.
- Undergo a risk based due diligence aiming at assessing any potentially exposure to corruption and/or any other illicit/ inappropriate practices.
- To accept the inclusion of specific anti-bribery provisions in contracts binding them to EUROAPI.

### 5.1. Measuring procedures, tools and indicators

The suppliers possess all adequate internal measuring procedures, tools and indicators that are necessary and sufficient to guarantee adherence to the principles listed above.

### 5.2. Compliance assessment

The suppliers agree that EUROAPI shall have the right to have a third party, approved by both parties, check compliance to the principles contained in this Code.

## 6. Privacy & Data Protection

Privacy and the protection of personal data is crucial for EUROAPI in the digital era.

In this respect, EUROAPI is committed to ensure that all partners, suppliers or third parties it has dealing with provide an adequate level of data protection for all personal data.

Therefore, EUROAPI requires that all suppliers and service providers:

- Respect the highest standards of protection for Personal Data in any processing of Personal Data implemented based on its relationships with EUROAPI as well as all applicable national and international laws and regulations relating to Personal Data protection. This commitment must

be extended, by suppliers or services providers, to all third parties to whom they may subcontract all or part of the tasks or services provided to EUROAPI.

- Implement adequate technical and organizational security measures to prevent any accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.
- Should a personal data breach occur, contain, handle and, where relevant, notify to EUROAPI any personal data breach related to personal data processed based on its relationships with EUROAPI.
- Manage, handle and, where relevant, respond and/or notify to EUROAPI any exercise of his/her personal data protection rights by any Data Subject.
- Ensure proper training of its personnel regarding privacy and data protection as well as on the implementation of adequate security measures.
- Undergo, through a risk-based questionnaire, a review aiming at ensuring EUROAPI that its suppliers, distributors, agents, and business partners are complying with Data Protection obligations.
- To accept the inclusion of specific Personal Data Protection provisions in contracts binding them to EUROAPI.

### 6.1. Cyber Security

The supplier makes sure of its compliance with EUROAPI's cyber security requirement, especially when the supplier is providing a service on a GDPR (Global Data Privacy Regulation) related system, has any interconnection with EUROAPI network, get privileged access to system/application belonging to EUROAPI and/or presenting risk of exposure to EUROAPI data in case of security breach.

### 6.2. Measuring procedures, tools and indicators

The supplier possesses all adequate internal measuring procedures, tools and indicators that are necessary and sufficient to guarantee adherence to the principles listed above.

### 6.3. Trainings

The supplier dispenses appropriate and actualized trainings to its workers and stakeholders to raise awareness about privacy, data protection and cyber security risks and the behaviors to adopt in case of breach impacting one of those topics.

### 6.4. Compliance assessment

The supplier authorizes EUROAPI to have a third party approved by both parties check compliance to these principles.

## 7. Useful Links

United Nations Global Compact: <https://www.unglobalcompact.org/>

International Labour Organization: <https://www.ilo.org/global/lang-fr/index.htm>

International Organization for Standardization: <https://www.iso.org/home.html>

EUROAPI – Our Corporate Social Responsibility: <https://www.EUROAPI.com/en/investors/company-overview/socially-responsible-investment>

EUROAPI – Our Suppliers Site: <https://fournisseurs.EUROAPI.com/>

EUROAPI – Code of Ethics: <http://www.codeofethics.EUROAPI/>