

Supplier code of conduct

Bring our culture to life
in the way we work every day.



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Message from the CEO



At EUROAPI, ethics, environmental responsibility, and respect for individuals are our non-negotiable principles. These values guide our actions and shape our ambitions for a more sustainable and responsible future.

We have set strong commitments in these areas and we expect the same from our partners. Whether you are a supplier, distributor, or business collaborator, we count on you to uphold the same high standards of integrity, care for the environment, and respect for human rights.

Together, we can build a value chain that reflects our shared responsibility and contributes to lasting positive impact.

David Seignolle

CEO

1. Introduction

EUROAPI is determined to apply the fundamental principles of the UNGC in the areas of human rights, working conditions, environment and fight against corruption on its whole value chain (upstream and downstream).

EUROAPI wishes to partner with all its suppliers and service providers 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 and service providers are also expected to ensure their own suppliers comply with these requirements.

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

EUROAPI expects its suppliers and service providers 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 or service providers who fail to ensure that the conditions and requirements outlined in this document are implemented shall find 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 and service providers are not engaged in and do not support any forms of child labor, do not employ persons under the age of 15 (or under the local legal age for finishing compulsory schooling should it be beyond 15) or persons under the age of 18 for hazardous work or work at night.

2.2. Forced labor

Suppliers and service providers 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 or debt to be repaid and the right to freely terminate employment voluntarily by means of notice of reasonable length at any time and without penalty nor retention of documents (e.g. passports, Visa, etc). They ensure that all employment contracts are written and transparent and include comprehensive provisions for employees.

2.3. Violence and harm

Suppliers and service providers 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. In particular, they should ensure that security personnel it employs, directly or indirectly, respects these guidelines.

2.4. Discrimination

Suppliers and service providers do not tolerate any forms of discrimination and treat all their employees equally, regardless of any characteristics other than their ability to do their job. It must consider that qualifications, skills and experience are the basis for 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 and service providers must respect working time in accordance with national legislation and in accordance with the ILO convention that promotes a daily rest of minimum 10 consecutive hours and 24 consecutive hours of rest every 7 days.

EUROAPI expects its supplier to comply with applicable labor laws and international standards regarding working hours: agreed upon with reasonable notice (never coerced), fairly compensated, overtime must be voluntary and managed transparently (through collective bargaining agreements).

2.6. Wages and fringe benefits

Suppliers guarantee that wages are paid regularly (at least monthly) including eventual overtime, as per contractual obligations and collective agreements, 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 do not interfere with this right. They prohibit any intimidation, harassment, punishment or discrimination against employees due to

trade union activities and do not discourage employees from joining organizations of their own choosing. They respect the right to collective bargaining and the role of workers' organizations for the purpose of collective bargaining and they commit 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.

Suppliers must proactively manage health and safety risks by promoting awareness, providing regular training, and fostering a culture of prevention across all operations.

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 their buildings, operations, equipment in the safest manner possible.

For the most hazardous processes, the supplier shall conduct specific risk analysis in order to implement measures and avoid any 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, intermediate 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 and outside the site by implementing safety barriers, emergency response plans and procedures. Moreover, simulation drills should be conducted periodically.

4. Environment

Suppliers and service providers 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 applicable local, national, regional and international (whichever is the most stringent) regulations relating to environmental protection for each site 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

Suppliers and service providers 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 and service providers do their best efforts to reduce and even prevent emissions generated by their activities.

Any waste, wastewater discharge or air emissions with potential to adversely impact human health or the environment 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, in accordance with the waste pyramid

Suppliers shall evaluate and minimize the environmental impacts of their

pharmaceutical substances from manufacturing activities.

their energy and water consumption to preserve natural resources.

4.4. Pollution prevention

Suppliers and service providers 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 spill and release to the environment.

Suppliers and service providers preserve biodiversity locally on their sites and indirectly, through their procurement policy, in particular for raw material and other production inputs.

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 and service providers are encouraged and evaluated on their company policy committed to reducing

5. Business ethics

EUROAPI is engaged in fostering an ethical culture aiming at reaching the highest standards. When selecting suppliers or services providers, EUROAPI 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 our 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 we have strict guidelines on invitation to social activities.
- Undergo a risk assessment based on due diligence aiming at identifying any potential 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.
- Refrain from unfair practices such as collusion, market manipulation, or misuse of confidential information. Activities related to lobbying must comply with applicable laws and ethical standards. Suppliers must also prevent money laundering, terrorist financing, and ensure responsible tax practices in all jurisdictions where they operate

5.1. Management system

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

Suppliers and service providers are expected to implement robust management systems to ensure compliance with the principles outlined in this Code of Conduct. This includes clear procedures, appropriate tools, defined roles and responsibilities, relevant KPIs, and regular training for staff and management. Suppliers and service providers must proactively monitor their operations and continuously improve their practices. Any deviation—whether tempo-

rary (e.g., incidents) or permanent—from the principles stated in this Code must be reported spontaneously and proactively to EUROAPI. Suppliers are expected to work constructively with EUROAPI and present a mitigation plan to address such deviations

5.2. Compliance assessment

The suppliers agree that during the course of the business relationships with EUROAPI, they may be audited by internal controllers, external auditors or legal department (to the sole decision of EUROAPI) to verify 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 accordance with applicable regulations, including the GDPR (European General Data Protection Regulation).

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

Therefore, 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 EUROAPI any personal data breach related to personal data processed based on its relationships with 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. Trainings

The supplier and service provider dispenses appropriate and updated training 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.

7. Artificial Intelligence

Euroapi is implementing an ethic approach into our digital transformation and evolution, as we are referring to the French Cybersecurity Agency's recommendations.

The recommendations state that generative AI tools for professional use involving sensitive data should be prohibited.

Euroapi requires that all suppliers and service providers have a proper governance in place to deliver their AI related services according to the principles of eco-responsibility, fairness & ethics, transparency, accountability and human oversight.



8. Compliance with the Principles for ethical Business

All employees, customers, suppliers and service providers, shareholders, partners and stakeholders have an anonymous and secure communication channel allowing them to communicate their concerns, requests, suggestions, queries or complaints in relation to compliance with these principles.

Multilingual and secured Euroapi ethics line is available 24/7 on the EUROAPI website or by using the below QR code

We take all compliance concerns seriously and EUROAPI is committed to safeguarding individuals who, in good faith, report potential breaches of this Code and we do not tolerate retaliation. Verified violations may result in appropriate remedial actions, including the potential reassessment or termination of the business relationship with the supplier or service provider.



9. Useful Links



United Nations Global Compact:

<https://www.unglobalcompact.org/>

International Labour Organization:

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

EUROAPI – Our Environmental, Social and Governance:

<https://www.euroapi.com/en/about-us/environmental-social-and-governance>

EUROAPI – Our Corporate governance:

<https://www.euroapi.com/en/about-us/corporate-governance>

EUROAPI – Code of Ethics:

<https://www.euroapi.com/en/about-us/business-ethics-and-compliance/nos-principes->