

# Centrient Pharmaceuticals

Business Partner Code of Conduct



We are a company with a clear purpose:

**“To improve lives by being at the center of sustainable and accessible healthcare”**

We promise Quality, Reliability and Sustainability to customers, partners, patients and the world at large. Our purpose, vision and values – Passion, Accountability, Collaboration, Innovation and Caring are a true reflection of our aspirations as an organisation and what we stand for. They represent our collective beliefs and are the guiding force behind our actions and decisions.

At Centrient Pharmaceuticals we conduct business with integrity. We have a responsibility to do the right thing. We wish to work with Business Partners such as suppliers, agents, distributors, contract manufacturers and other partners, whose ethical standards are equivalent to ours. We expect that our Business Partners share the same beliefs and also do the right thing.

This Business Partner Code of Conduct explains the conduct that we expect from our Business Partners and sets out the principles that they must commit to.

# Passion

**We obey laws and regulations**

**We SpeakUp to stop or prevent misconduct**

**Compliance with laws and regulations:** We expect our Business Partners to follow all international, national and local laws and regulations that are applicable to their business operations.

**SpeakUp:** We expect our Business Partners to operate with integrity and to report concerns to stop or prevent misconduct. All concerns relating to business operations with Centrient can be reported through Centrient's SpeakUp procedure, also on an anonymous basis.



## SpeakUp

If you believe misconduct is taking place or is about to take place, you should SpeakUp! You can report your concerns anonymously if you wish to do so. The Centrient SpeakUp hotline and the SpeakUp website are hosted by a third party (Navex Global – EthicsPoint).

You can submit a report using one of the following channels:

### Call the SpeakUp hotline:

The Centrient SpeakUp hotline is available 24 hours a day, seven days a week. Operators are available to listen to your concerns in your local language, if needed. Please make use of the below toll-free country-specific telephone numbers lines:

China: 400 120 3522

India: 000 800 0502 073

Mexico: 800 099 0241

Netherlands: 0800 024 9783

Spain: 900 998 420

### Use the SpeakUp website:

If you wish to file an online report of misconduct relating to Centrient Pharmaceuticals, you can do so using the following link. Full instructions in several languages and FAQs are available on the website.

### Submit a report by email or post

For SpeakUp reports relating to Centrient Pharmaceuticals you can also send an email to [alert@centrient.com](mailto:alert@centrient.com) or mail a letter to Centrient Pharmaceuticals, Global Risk and Compliance Director, Weena 798A, 3014 DA Rotterdam, the Netherlands.

# Accountability

We conduct business in a fair, responsible and honest way  
We keep accurate and complete records

**Compliance with anti-bribery and corruption laws:** We conduct business in a fair and honest way and have a zero-tolerance approach to bribery and corruption. We expect our Business Partners to refrain from all forms of corruption. This means that they will never offer, give, request or accept bribes or any other type of improper preferential benefit (including kickbacks and facilitation payments) to anyone.

**Gifts and Hospitality:** Our Business Partners do not offer Centrient employees gifts and hospitality (including cash or cash equivalents such as gift cards) that could or could appear to inappropriately influence a business decision.

**Avoidance of conflicts of interest:** We expect our Business Partners to be open and transparent to us about a conflict of interest relating to a Centrient employee. They should immediately disclose a potential, actual or perceived conflict of interest before starting a business relationship or during the relationship.

**Trade compliance:** We expect our Business Partners to strictly comply with all applicable laws for the import and export of goods (including sanctions and export control laws and regulations) and their strict policies in this respect. They will provide accurate and truthful information about their business to customs, other relevant authorities and to Centrient, where needed.

**Fair competition:** We expect our Business Partners to support fair competition throughout the world, and therefore they must comply with all competition and antitrust laws in all countries in which they operate. Our Business Partners will not enter into restrictive agreements or practices to fix prices, divide markets, limit volumes or abuse a possible dominant position.

**Avoidance of fraud:** We expect our Business Partners not to engage in fraud against Centrient or any other party. Our Partners must have internal procedures to detect, prevent and respond to fraud and money laundering. Our Business Partners must keep accurate, complete and up-to-date records in relation to their business activities with Centrient.

**Protection of personal data:** Our Business Partners protect the personal data of Centrient employees, customers and other third parties we work with. Our Business Partners will comply with applicable laws and implement appropriate security measures to protect personal data. They will only collect, use, share and retain personal data for legitimate business purposes.

# Collaboration

We recognise people's fundamental rights

We promote a diverse, inclusive and respectful workplace

**Human rights:** Our Business Partners will adhere to internationally recognised human rights as outlined in the United Nations Universal Declaration of Human Rights and the core conventions of the International Labour Organisation. Under no circumstances will our Business Partners accept or make use of forced, bonded labour, involuntary prison labour or child labour.

**Employment standards:** Our Business Partners will adhere to the employment laws in the countries where they operate. Their working hours, overtime and remuneration must be fair and justified.

**Equal Opportunities:** Our Business Partners will promote a diverse, inclusive and respectful workplace which is free of discrimination. They will not discriminate in any manner on the basis of race, culture, nationality, age, religion, gender, pregnancy, sexual orientation, association, disability or any other protected status.

**Anti-harassment:** We expect our Business Partners to treat all people with respect. They will not tolerate conduct that creates an intimidating, offensive or hostile work environment for any person or group of persons. They will immediately act upon such misconduct.

**Freedom of opinion, speech and association:** We expect our Business Partners to respect the right of their employees to freedom of opinion, speech and association as set forth in local law.

**Compliance of subcontractors:** Our Business Partners will ensure that any party that they involve to perform work for Centrient, will be made aware of the principles in this Code and will act in compliance with them.



# Innovation

We support the principles of continuous improvement

We safeguard Centrient's assets and proprietary information

**Continuous improvement:** Our Business Partners will evaluate and improve their products, working systems, production processes and services on a continuous basis.

**Protection of confidential information:** Our Business Partners will respect intellectual property (IP) rights at all times. They will secure and protect IP rights and confidential information provided by Centrient against any unauthorized disclosure.

**Protection of Centrient assets:** If our Business Partners need to rely on Centrient company assets, they will take good care to use assets and resources for their intended business purpose and not lose, damage or misuse them.

# Caring

We put safety first

We are committed to protecting the environment

**Workplace safety and health:** Our Business Partners must conduct business in a safe way. They will ensure the safety and health of their own employees, contractors and others around them at their workplace and during work assignments when outside. Our Business Partners will adhere to the safety standards and practice as contractually agreed upon with Centrient. When working at Centrient's premises, our Business Partners will act in accordance with Centrient safety standards and practice (including Life-Saving Rules).

**Environmental impact:** We expect our Business Partners to act in compliance with all relevant environmental laws (including required permits). They must try to minimise the environmental impact of their operations. This includes continuous environmental improvements, such as on reduction in raw materials, energy, emissions, discharges, noise, waste and reliance on natural resources and hazardous substances by means of clear targets and improvement policies.

**Sustainable procurement:** Our Business Partners must have high standards on sustainability. We expect that our suppliers adhere to the terms of our Supplier Sustainability programme, which covers sustainable procurement, safety, health, environment, labour and fair business practices. We expect our suppliers to follow the Pharmaceutical Supply Chain Initiatives (PSCI) sustainability principles ([see this link](#))

**Animal welfare:** We expect our Business Partners to commit to safeguarding animal welfare. This means that animals shall be treated humanely, with pain and stress minimised. Alternatives to animal testing should be used by our Business Partners wherever these are scientifically valid and acceptable to regulators. Animal testing should only be performed after careful consideration.

**Management systems:** We expect our suppliers to use management systems to maintain business continuity, facilitate continuous improvement and compliance. These management systems should include the elements as agreed by PSCI ([see this link](#)).

If any part of this Code is unclear or raises questions, you should ask your Centrient contact for explanation. Non-compliance with this Business Partner Code of Conduct may result in actions, including immediate termination of the business relationship. Centrient may seek to verify Business Partner’s compliance with this Code, including through audits.

The principles as outlined in the Business Partner Code of Conduct are:

- We obey laws and regulations
- We SpeakUp to stop or prevent misconduct
- We put safety first
- We are committed to protecting the environment
- We conduct business in a fair, responsible and honest way
- We keep accurate and complete records
- We recognise people’s fundamental rights
- We promote a diverse, inclusive and respectful workplace
- We support the principles of continuous improvement
- We safeguard Centrient’s assets and proprietary information

We confirm to comply with these principles as set out in this Business Partner Code of Conduct

**Name signatory**

**Company name**

**Date / Signature**

This Code contains general requirements applicable to all Business Partners of affiliates of the Centrient group. This Business Partner Code of Conduct may be revised or updated by Centrient from time to time. To the extent there is a conflict between applicable law or provision of any agreement and this Business Partner Code of Conduct, the applicable law or agreement will prevail.