



making healthcare more accessible

# Supplier Code of Conduct

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## Message from CEO

Dear Suppliers,

For almost a century, Zuellig Pharma has been living by our mission of making healthcare more accessible in Asia. The support of our employees and the close working relationship we have with you, our suppliers are central to us fulfilling our role in the healthcare supply chain.

From experience, it is clear to us that only by upholding the highest standards of conduct will our stakeholders – Clients, Customers, and Governments grant their confidence and trust and enable you to differentiate yourself as an employer and supplier of choice.

Whether you are early in your sustainability journey or an industry leader, we can be united in our efforts to uphold the highest ethical standards, protect our employees and our environment so that we can grow together to better and continually serve the communities we live in.

We hope our guidelines and best practices will help bring our working relationships to the next level and enable us to continue making a difference to the communities we serve.

Thank you for your commitment and unwavering support and we look forward to many years of successful partnerships together.

Best regards,  
John Graham  
CEO

## Introduction

Sustainable Procurement is procurement that strives to have a positive environmental, social and economic impact across the purchasing and supply management lifecycle, whilst upholding company needs for cost efficiency and security of critical supply.

Our Sustainability Vision is to build a healthier future for Asia with our clients, customers and partners by improving health outcomes, nurturing talent and respecting the environment, while setting the highest standards of integrity.

### Our Principles

- Zuellig Pharma is committed to upholding the highest ethical standards in all aspects of our business. Suppliers are expected to act with integrity and conduct their business in an ethical manner, in compliance with Zuellig Pharma's Code of Conduct and policies and all applicable laws and regulations.
- Suppliers must treat all of their employees with respect and dignity, strictly comply with all applicable labour laws and regulations and promote workplace diversity, equality and inclusion.
- Suppliers are expected to operate in an environmentally friendly manner, with respect to international guidelines and all applicable environmental laws and regulations. Suppliers shall have programs in place for managing and maintaining all their production processes in accordance with all applicable safety standards and all applicable health and safety laws and regulations.
- Suppliers shall implement adequate actions to facilitate continual improvement and compliance with the expectations of this Supplier Code of Conduct.

We understand that some of our suppliers might not be able to comply fully with all the sustainability principles and standards outlined in this Supplier Code of Conduct and we recognise that this is an ongoing journey. Our pragmatic approach to Sustainability in Procurement involves having a vision of where we need to get to and an action plan on how to get there, while acknowledging that we need to teach ourselves and our supplier base about the importance and advantages of being a sustainable business.

### Joint Benefits

- Revenue growth • Regulatory compliance • Improve service offering • Drive innovation • Enhance brand image • Environmental compliance • Competitive advantage • Community Contributor

### Our Objective

The main objective is to spearhead and demonstrate adherence to our commitment to sustainability and comply with all relevant sustainability legislation, regulations and standards. The priority areas are:

1. **Upholding the right Ethics Standards**
2. **Championing Fair Labour Practices**
3. **Caring for the Environment**
4. **Demonstrating Health and Safety**
5. **Reporting and Governance**

# Ethics

***Zuellig Pharma is committed to upholding the highest ethical standards in all aspects of our business. Suppliers are expected to act with integrity and conduct their business in an ethical manner, in compliance with Zuellig Pharma's Code of Conduct and policies and all applicable laws and regulations. The Ethical Practices include:***

## **Business Integrity**

Suppliers should work against corruption in all forms, including bribery, fraud, extortion or embezzlement. Suppliers are expected to comply strictly with Zuellig Pharma's Code of Conduct and policies and all applicable Anti-Corruption laws and shall not offer or accept bribes or other unlawful incentives to/from their business partners or any entity to retain or gain an advantage in obtaining business.

## **Gifts**

In order to maintain our obligations on ethical standards, accepting gifts from third parties, including suppliers, is prohibited for all Zuellig Pharma employees. This prohibition includes all gifts, including customary/festive gifts, and regardless of value.

## **Identification of Concerns**

Suppliers shall provide platforms for their employees to report concerns or potentially unlawful activities in the workplace in a confidential manner without fear of retaliation. This involves performing due investigations and implementing necessary corrective actions. Suppliers who believe that a Zuellig Pharma employee, or anyone acting on behalf of Zuellig Pharma, has engaged in illegal or otherwise improper conduct should report the matter promptly to their Zuellig Pharma contact or via Zuellig Pharma's Speak Up channel.

## **Debarment**

Suppliers must not at any time use in any capacity, in connection with the supply of its good and/or performance of its services, the services of any employee, third party or other person debarred under the US, UN or applicable exclusion or Debarment lists.



## **Fair Competition**

Suppliers will conduct their business in line with fair market competition standards, complying with all applicable anti-trust laws and regulations.

## **Trade Compliance**

Suppliers are expected to import, export and engage in all forms of trade in a legal and ethical manner.

## **Privacy and Intellectual Property**

Suppliers shall safeguard personal data and confidential assets and information, to ensure that the privacy and intellectual property rights of all employees, clients and business partners are well protected.

## **Conflicts of Interest**

Suppliers must avoid conflicts of interest in their relationship with Zuellig Pharma and other related business partners. If a Supplier or its employee is in a position which may or appear to be in a conflict of interest with the business relationship with Zuellig Pharma, the Supplier should disclose this to Zuellig Pharma in writing promptly.

# Labour

*At Zuellig Pharma, our people are our most important assets. Suppliers must treat all their employees with respect and dignity, strictly comply with all applicable labour laws and regulations and promote workplace diversity, equality and inclusion. The Labour Practices include:*

## Abolition of Child Labour

Suppliers are expected to adhere to International Labour Organization (ILO) standards in their business operations in fighting any form of child labour. Suppliers are expected to have adequate and verifiable mechanisms for age verification in recruitment procedures.

## Freely Chosen Employment

Suppliers should uphold the elimination of all forms of forced and compulsory labour. All work must be voluntary, and employees should be free to leave in accordance with established rules.

## Non-discrimination

Suppliers should avoid discrimination in employment practices. These discriminations commonly include: Race, colour, age, gender, ethnicity, disability, religion, political opinion, marital status, union membership or sexual orientation.

## Fair Treatment

Suppliers shall treat their employees equally in a consistent manner. Any form of harassment, sexual abuse, corporal punishment, torture, verbal abuse, mental or physical coercion is strictly prohibited within our operating chains.

## Freedom of Association

Suppliers should respect the right of association and the effective recognition of the right to collective bargaining. Suppliers should respect the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal, in accordance with applicable local laws.



## Working Hours, Wage and Benefits

Suppliers are expected to provide their employees with fair compensation and benefits, including minimum wages, overtime hours and other benefits mandated by law. Working hours for employees will not exceed the maximum set by the applicable local laws and regulations.

# Environment

*Suppliers are expected to operate in an environmentally friendly manner, with respect to international guidelines and all applicable environmental laws and regulations. Elements of Environmental Practices include:*



## Environmental Authorisations

Suppliers shall conform with applicable environmental laws and regulations. Required environmental permits, licenses, information registrations and restrictions shall be obtained, and their operational and reporting requirements complied with.

## Waste and Emission

Suppliers are encouraged to undertake initiatives to promote greater environmental responsibility. Any potentially and adversely impactful material should be appropriately managed, measured, controlled and handled prior to release of any substance into the environment. Suppliers must have systems in place to prevent or mitigate accidental spills and releases of waste into the environment.

## Respect for the Environment

Suppliers are responsible to protect the environment and encouraged to commit to the protection of the environment as part of every decision they make. The goal is to avoid any situation that may lead to unacceptable environmental or health hazards for employees, the public or the environment in general.

## Partnering for Innovation

Suppliers are encouraged to participate in the development of environmentally friendly technology. We encourage and seek business partnership with suppliers in areas of improving efficiency, reduce, reuse, recycle initiatives, and of product design, energy conservation and sustainability.

# Health and Safety

*Suppliers shall have programs in place for managing and maintaining all their production processes in accordance with all applicable safety standards and all applicable health and safety laws and regulations. Elements of Health and Safety Practices include:*



## Employee Health and Safety

Suppliers shall have systems and processes in place to protect workers from exposure to chemical, biological and physical hazards (including physically demanding tasks) in the workplace and in any company-provided living quarters. Suppliers will also provide appropriate controls, safe work procedures, preventative maintenance and necessary technical protective measures to mitigate health and safety risks in the workplace.

## Hazard Information

Safety information relating to hazardous materials – including pharmaceutical compounds and pharmaceutical intermediate materials – shall be available to educate, train, and protect workers from hazards.

## Process Safety

Suppliers shall have programs in place for managing and maintaining all their production processes in accordance with the applicable safety standards. Suppliers will address product-related issues and their potential impact during all stages of the production process as well as the transportation process. In scenarios relating to hazardous installations, the suppliers will conduct specific risk analysis and implement measures that prevent the occurrence of incidents such as chemical releases and/or explosions.

## Contingency Preparation

Suppliers shall identify and assess emergency situations in the workplace and any company-provided living quarters and implement emergency plans and response procedures.

# Governance

*Suppliers shall implement adequate actions to facilitate continual improvement and compliance with the expectations of this Supplier Code of Conduct. Elements include:*



## Documentation

Suppliers are expected to demonstrate commitment to the concepts described in this Supplier Code of Conduct by implementing an appropriate and auditable reporting and documentation system. Suppliers shall present this documentation to Zuellig Pharma as evidence of complying with applicable policies and regulations. The documentation can be in the form of an annual report or in checklist format. Zuellig Pharma will share our documentation system format and detail with suppliers, based on the type of product and service we purchase. Suppliers deemed critical and/or material to our business will be proactively engaged in an in-depth evaluation of required controls and assessment of their Sustainability improvement programs.

## Legal Principles

Suppliers shall identify and comply with applicable laws, regulations, standards and relevant requirements of Zuellig Pharma and our clients and customers. Zuellig Pharma reserves the right to exclude suppliers whose practices, policies or procedures do not conform to the standards outlined in this policy or who are not willing to demonstrate good-faith efforts on the path of improvement. Suppliers who are deemed material to Zuellig Pharma may be engaged in an in-depth assessment and an evaluation of compliance to this Supplier Code of Conduct.

## Training and Competency of Improvement

Suppliers shall have continuous training programs that achieve an appropriate level of knowledge, skills and abilities in management and workers to address these expectations.

## Accurate Records

Documentation must be made available to Zuellig Pharma or its designated auditor to inspect upon request, demonstrating compliance to these standards. Records must be legible, transparent and reflect actual transactions and payments. Suppliers shall not hide, fail to record or make false entries.

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**Issued By: Zuellig Pharma Holdings Pte Ltd**

**VP Procurement**