



SUPPLIER CODE OF CONDUCT





About SGD Pharma

SGD Pharma is recognized as a global leader in glass pharmaceutical packaging. Our Organization produces more than 8 million vials and bottles per day across our network of five manufacturing plants in Europe and Asia. In order to support its leadership position and continue to deliver the highest quality glass, SGD Pharma believes that a strong commitment and a strategic approach to corporate responsibility are essential for managing challenges and opportunities in a rapidly changing global environment.

As a result, SGD Pharma has developed standards of ethical and sustainable business conduct with compliance required from all business operations and employees.

Suppliers to SGD Pharma also play an important role in enabling our business model and sustainable success. SGD Pharma strives to conduct business with Suppliers that share our commitment to high ethical standards and operate in a responsible and ethical way.

SGD Pharma expects all of its Suppliers to share and be compliant with the principles expressed in this Supplier Code of Conduct. It is fully in line with our vision and has been developed with recognition of the ten principles outlined in the United Nations Global Compact.

Legal Compliance

The provisions of this Supplier Code of Conduct set forth SGD Pharma's expectations from all suppliers with whom it does business. SGD Pharma expects the Supplier and any of its subsidiaries or affiliates and their own chain of subcontractors to comply with its principles.

SGD Pharma encourages the supplier to invite its own Suppliers to comply with its terms.

The Supplier and its employees are expected, as a minimum, to comply with the requirements set forth in this Supplier Code of Conduct or with the provisions of the laws and regulations in each jurisdiction(s) where the Supplier operates, whichever is more stringent.

Ethics

Suppliers shall conduct their business in an ethical manner and act with integrity. SGD Pharma expect its suppliers to comply with all legal and regulatory requirements regarding ethics including:

Prevention of conflicts of interest

Supplier's employees must act solely in the interest of their company and must refrain from having any personal interest or benefiting from their position to obtain advantages for themselves or for third parties. SGD Pharma expects its suppliers to declare any conflict of interest that might affect the performance of contracts and service agreements executed with them by SGD Pharma.

Corruption and influence peddling

SGD Pharma requires its suppliers to comply scrupulously with national and international regulations and legislation on corruption, bribery, prohibited business practices and extortion and with its General Policy on Compliance with Anti-Corruption Principles*. Suppliers mustn't accept or offer cash sums, gifts, services or any other benefits.

Respect for the principles of free competition

Suppliers shall conduct business competitively and in full compliance with applicable laws, codes and regulations.

Conflict minerals

Suppliers shall track and report the presence or use of conflict minerals in the parts, components or materials supplied to SGD Pharma. (e.g. Coltan, cassiterite, gold, wolframite and derivatives: tantalum, tin, and tungsten...)

Animal welfare

SGD Pharma strongly support animal welfare and encourage its suppliers to avoid using animals in any testing or process, whenever possible. Alternatives should be used when scientifically valid and acceptable to regulators. Animal testing should occur only after alternate methods have been fully explored and are not possible. Animals shall be treated humanely, minimizing pain and stress.

Privacy and data protection

Suppliers must safeguard and make only necessary use of confidential information to ensure that company and worker privacy rights are protected. Confidential information includes, but is not limited to:

- Purchase Material and services specifications and conditions
- Requests for quotation, Cost sheets
- Profit information
- Asset information
- Names of suppliers
- Pricing
- Purchase strategies
- Contact details
- R&D data
- Financial/sales/marketing/information
- Operating processes / formulas and other knowhow and trade secrets, which are SGD Pharma property and have not been disclosed to the general public
- Computer software programs
- Personal information about employees, officers and directors
- Wage and salary scales

*Available on request by sending an email to: directionjuridique@sgdgroup.com

Ethics

Supplier visitation process

Suppliers will be provided* with a Mutual Non-Disclosure Agreement (NDA) form which must be completed and signed by each party before proceeding with any visits to SGD Pharma premises.

Supplier must not be on SGD Pharma premises without proper registration and access badge (made visible at all times while on SGD Pharma property).

Suppliers must be accompanied by an SGD Pharma purchasing professional or SGD Pharma representative at all times while on SGD Pharma property.

Suppliers are never to occupy an SGD Pharma employee's office or cubicle without displaying proper SGD Pharma issued identification.

Suppliers upon departure from SGD Pharma property, are to leave their visitor badge with the receptionist.

Whistleblowing procedure

SGD Pharma encourages it's all stakeholders (suppliers & their employees, own employees, customers) to come forward and report when it becomes aware of any person or party's actions that may constitute bribing, a crime or offence, a breach of an international regulation, a breach of the Code of Business Conduct and Ethics, a threat or potential prejudice to the public interest with no adverse consequences to the reporting person who reports such acts.

They can reach us directly or report through the following whistleblowing hotline

report@expolink.co.uk

The hotline number is:

- France: 0800 900240
- China: 10800 152 2112
- India: 000 800 440 1286
- Germany: 0800 182 3246

The address of the web portal is:

<https://wrs.expolink.co.uk/sgd-pharma>

*Available on request by sending an email to: directionjuridique@sgdgroup.com

Labour & human rights

Suppliers should be committed to uphold the human rights of workers and to treat them with dignity and respect. SGD Pharma adheres to relevant international standards and conventions and expect suppliers to do the same, in particular those related to:

Forced labour

SGD Pharma requires its Suppliers to not use forced, bonded, indentured or involuntary prison labour.

Child labour

SGD Pharma does not employ child labour and requires its suppliers to adhere to the same policy. According to the standards endorsed by SGD Pharma, any human being is considered a "child" if they are under the age of 15 years old or are entitled to attend school or full-time education by local legislation and such work would interfere with their schooling. A child must not be permitted to work at night or in hazardous conditions.

Working hours, wages and benefits

Working hours must comply with the provisions of the current national legislation in the applicable jurisdiction. Suppliers must pay their employees according to applicable national laws regarding minimum wages, overtime hours and mandated benefits.

Respect and dignity

SGD Pharma expects its Suppliers to treat their employees with respect and dignity and strictly forbid any form of physical violence, psychological violence, threat of physical violence, sexual abuse, physical or psychological harassment, and any other form of intimidation.

Freedom of association

Suppliers are expected to recognize the principle of freedom of association and the right to collective bargaining.

Discrimination

SGD Pharma supports diversity and employment equity. Suppliers are expected to offer equal employment opportunities, remuneration, professional promotions or disciplinary measures without regards on the ethnic, origin, religion, nationality, age, gender, disability, political convictions or physical appearance... (non-exhaustive list).

Health & Safety

SGD Pharma requires its Suppliers to guarantee optimal health and safety conditions for their employees. At a minimum, the Supplier must comply with all applicable health and safety laws, regulations and standards.

Worker protection

Suppliers should protect employees from exposure to chemical, biological and physical hazards, unnecessary physically demanding tasks in the workplace or other company-provided facilities and transportation vehicles. Suppliers shall provide appropriate controls, safe work procedures, preventive maintenance and technical protective measures to minimize health and safety risks in the workplace. If necessary, Suppliers will provide its employees with appropriate personal protective equipments (PPE).

Process safety

Suppliers should have programs in place to prevent or mitigate catastrophic releases of chemicals and other identified major risks.



Emergency preparedness and response

Suppliers should identify and assess emergency situations and minimize their impact by developing and implementing emergency plans and response procedures.

Hazard information

Safety information regarding hazardous materials should be available to educate, train and protect workers from workplace hazards.

SGD Pharma encourages its Suppliers to:

- Communicate to its management, employees and contractors its commitment to improving health and safety, and to provide training on these commitments.
- Apply for and maintain ISO 45001 or equivalent certification, and systematically evaluate its health and safety performance through appropriate audits and report progress.

Environment

Suppliers should operate in an environmentally responsible and efficient manner, minimizing adverse impact on the environment. Suppliers are encouraged to preserve natural resources, avoid the use of hazardous materials and engage in activities that reuse and recycle.

Environmental authorizations

Suppliers should comply with all applicable environmental legislation, regulation and standards. All required environmental permits, licenses, registrations and reporting to authorities should be obtained, and all operational and reporting requirements shall be followed.

Climate change

Since 2005, SGD Pharma has implemented various measures to reduce greenhouse gases emissions. SGD Pharma expects its suppliers to also minimize or eliminate practices which have negative impacts on climate at their source. (e.g. recycling or reuse, raw material substitution, use of low carbon energy and energy efficiency, modification of production...).

Efficiency of resources

Suppliers shall implement systems to optimize the use of all applicable resources sustainably (e.g. energy, water, materials...).

Waste and emissions

Suppliers should have systems in place to ensure safe handling, movement, storage, recycling, reuse or management of waste, air emissions. Any waste, wastewater or emissions with the potential to adversely impact human or environmental health should be appropriately managed, controlled and treated.

Spills and releases

Suppliers should have systems in place to prevent and mitigate accidental spills and releases to the environment.

SGD Pharma encourages its Suppliers to:

- Communicate its commitment to improving the environment, and to provide support and training to its management, employees and contractors so that they can fulfil these commitments.
- Attain and maintain ISO 14001 or equivalent certification, and systematically evaluate its environment performance through appropriate audits and report progress.

Management System

Suppliers should be committed to implement management systems to facilitate adherence to all applicable laws and regulations and strive for continuous improvement.

Commitment and responsibility

Suppliers must show their commitment to the principles outlined in this Supplier Code of Conduct by allocating the appropriate resources and support.

Legal and customer requirements

Suppliers shall identify and comply, in good faith, with all applicable laws, regulations, generally recognized standards and contractual agreements.

Assessment and risk management

Suppliers shall implement mechanisms to identify, determine and manage risks in all areas addressed in this Supplier Code of Conduct as well as applicable legal requirements.

Documentation

Suppliers must maintain adequate documentation to demonstrate that it shares the principles and values set forth herein as well as respecting its regulatory and contractual agreements.

Training and competency

Suppliers should establish appropriate training measures and programs that allow its managers and employees to reach an actionable level of understanding and knowledge of this Supplier Code of Conduct as well as applicable legislation, regulations and standards.

Business continuity

Suppliers are responsible for the development and implementation of appropriate business continuity plans for operations supporting SGD Pharma activities.

Continuous improvement

SGD Pharma expects its Suppliers to be continuously improving by setting performance objectives, executing implementation plans and taking the necessary corrective actions for important deficiencies identified.

SGD Pharma

supplier code
of conduct

I certify that our company has received, read, understood and will abide by the SGD Pharma Supplier Code of Conduct if we are chosen as an SGD Pharma Supplier

COMPANY NAME

LEGAL REPRESENTATIVE

JOB TITLE

SIGNATURE

COMPANY STAMP

DATE

SIGNATURE

Appendix

Please find below, examples of good and bad practices which can be either or both applicable to SGD Pharma purchaser team or Suppliers.

DO'S

- Declining a valuable gift from a supplier.
- Coverage of travel expenses for a member of SGD Pharma's purchasing team visiting a supplier's site subject to compliance with the LOA and FCPA, must always be duly authorized and documented accordingly. A member of the client's family is not eligible.
- Accepting and receiving professional hospitality (meals, entertainment), provided it has a legitimate business purpose and the expense is reasonable, proportionate and transparent.
- Accepting a ticket to attend a trade exhibition from a supplier.
- Notify my hierarchy when offered a potential bribe.

DON'T

- Offering a sum of money to an official to obtain a license or permit without following normal practices, laws or procedures.
- Offer a small (or any) amount of money to a customs officer to quickly clear your company's equipment through customs.
- Recruitment of an employee at the request of a Public Authority.
- The act of a supplier offering a gift to a company buyer in order to influence or obtain a contract.
- A buyer asks a supplier for a sum of money in return for a contract awarded.
- A company's sales representative offers a buyer a gift in order to obtain a contract or influence buying decisions.
- Obtaining or accepting a retroactive commission in return for favorable terms or a contract.
- An agent or business contributor, acting on behalf of your business, an agent or business contributor, proposes or receives, directly or indirectly, an undue advantage in the course of its activities.
- Using the political connections of an employee who is locally elected to obtain an exploration permit or a building permit in his or her municipality or other undue advantage.
- The fact that an employee receives an advantage from a supplier in order to influence the tendering process in his or her favor.
- Illegally communicating strategic information about a project in exchange for a favor.
- Entrusting a service to a company only because it belongs to the uncle of the employee of your company, who is the decision-maker of the contract.
- Pay a sum of money to a professional union to avoid a strike action that shuts down business activities at one of your company's sites.
- Sponsor a SGD Pharma employee and/or a SGD pharma employee family's show or sport club.

Beware, corruption can be "**active**": offering, promising, granting or "**passive**": soliciting, agreeing to receive an advantage improperly.



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