

Supplier Code of Conduct

Fostering Integrity: Recordati's Supplier Code of Conduct

At Recordati, our commitment to ethical practices, social responsibility, and sustainability extends beyond our operations to encompass our entire value chain. This Supplier Code of Conduct reflects our dedication to transparency, accountability, and fairness, setting the foundation to establish strong, responsible partnerships. Guided by international standards, our ESG strategy, and our Code of Ethics, this Code of Conduct serves as a framework for ethical business practices to support shared progress. Together with our suppliers, we strive to uphold these values and drive positive impacts for people, communities, and the planet.

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INTRODUCTION

Recordati Group's (hereafter "Recordati") dedication to ethical practices, social responsibility, and environmental stewardship extends across its entire value chain. This Supplier Code of Conduct outlines the key principles we expect every Supplier to uphold. These principles are designed to align with Recordati's ethical standards while fostering a sustainable and resilient supply chain.

Inspired by Recordati's Code of Ethics, Human Rights Policy, D&I Policy, Environment, Health and Safety Policy, this document focuses on key aspects of business ethics, including among others human rights, labour practices, health and safety and environmental sustainability.

The present Supplier Code of Conduct aligns with key international standards, including the UN Guiding Principles on Business and Human Rights (UNGPs), the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, which includes the Universal Declaration of Human Rights, and the Charter of Fundamental Rights of the European Union. These frameworks are essential not only to the way Recordati operates itself, but also to the way it engages with its suppliers.

Adherence to this Code is a fundamental requirement for doing business with Recordati, reflecting our shared commitment to sustainable growth and ethical conduct. Suppliers are encouraged to promote these principles also in their own value chain.

In carrying out their activities, any Supplier interacting with Recordati commits to acting in accordance with the principles set out in this Code and in the Recordati's Code of Ethics. Recordati considers any violation of the abovementioned and below principles, as a breach of the obligations deriving from the contract in place which may lead to consequences, as detailed in the paragraph "Reporting of violations".

PRINCIPLES

Ethics

Recordati is steadfast in its commitment to the highest standards of ethical conduct and requires its suppliers to uphold integrity, transparency, and accountability in all aspects of their operations. Suppliers are expected to comply with applicable laws, the Recordati Code of Ethics and to adopt practices that ensure ethical business practices across the supply chain.

Suppliers must demonstrate a commitment to business integrity by adhering to the highest ethical standards, avoiding all forms of bribery, corruption, and extortion, and transparently disclosing any potential conflicts of interest, including those involving Recordati employees.

Recordati prohibits corruption in all its forms and in every country, with no exceptions, in relation to both private individuals and Public Officials. Suppliers must not promise or offer money, gifts, or other incentives to others in order to influence their decisions or obtain undue benefits. Likewise, they shall not accept any special favours, undue compensation, or gifts.

Adherence to anti-trust and competition laws is also essential for fostering a fair and lawful business environment.

Suppliers must respect the competition laws of every country in which they operate. To that end, suppliers must not engage in any conduct which could undermine or distort fair competition.

In addition, suppliers are called upon to take the necessary measures to prevent and avoid potential conflicts of interest. They are strictly forbidden from obtaining any advantage for themselves, their family members, or their acquaintances through business opportunities which they learn of during the performance of their duties. Data privacy is equally critical, and suppliers are required to handle personal data in compliance with applicable data protection laws, while maintaining stringent confidentiality and security standards for both personal and business information.

In addition, suppliers must comply with all applicable trade regulations, including licensing requirements, embargoes, sanctions, and other trade restrictions imposed by the European Union, the United Nations, the United States, and the United Kingdom.

These ethical principles are fundamental to sustaining trust and fostering ethical collaboration across the Recordati supply chain, ensuring that all partners act responsibly and transparently.



Human Rights and Labour Practices

Recordati expects its suppliers to uphold and respect human rights, by promoting ethical labour practices and fostering workplaces free from discrimination, exploitation or abuse.

Recordati takes a zero-tolerance approach towards child labour, forced or compulsory labour, modern slavery and any form of human trafficking across its operations and its supply chain. Therefore, suppliers are required to proactively prevent and eliminate all forms of child labour, forced labour, compulsory labour, and any form of modern slavery, and human trafficking.

Suppliers must not employ workers who are younger than the country's legal minimum age for employment or the age established for completing compulsory education. Children under the age of 15 must not be employed under any circumstances. Suppliers can employ young workers (those between 15 and 18), only if allowed by local law, to perform work that does not pose a threat to their physical, mental, or moral health and safety, and they are fully protected from hazardous tasks.

All employment must be voluntary, and no employee should be coerced, bonded, or forced to work under the threat of punishment, violence, or abuse. Unacceptable practices include withholding personal property, passports, wages or any other document without a legitimate and lawful reason. For the avoidance of doubt, suppliers can retain copies of such documents only when required to ensure compliance with legislation. Suppliers must ensure employees have the right to leave freely, provided that they comply with requirements for advance notices as specified by applicable law.

Recordati expects its suppliers to provide fair and dignified working conditions, including fair remuneration that meets or exceeds the local minimum wage, legally mandated benefits, paid leave, and appropriate overtime compensation. In compliance with national laws and industry standards, working hours have to be structured to promote a healthy work-life balance, and with overtime being voluntary and compensated fairly.

Suppliers must provide a workplace free from discrimination based on gender, age, ethnic/racial origin, sexual orientation, gender identity, physical ability and neurodiversity, nationality, cultural origin, learning styles, religion, family status, field of education, socioeconomic situation, or any other personal characteristics. Discrimination, harassment, bullying or any form of abuse is not acceptable. Our commitment extends to fostering a safe, respectful, and inclusive working environment, by requiring our suppliers to ensure equal pay for work of equal value, eliminate biases, and actively promote equitable opportunities for professional growth, continuous learning and development for all individuals, regardless of their background or personal characteristics.



Recordati believes in freedom of association and collective bargaining. Suppliers must guarantee their employees the freedom to organise, join unions, and engage in collective bargaining without fear of retaliation.

Health and Safety

Health and safety are of paramount importance at Recordati. Suppliers are required to adhere to all applicable local, national, and international health and safety regulations, implementing measures that minimise risks and prevent accidents. Suppliers must provide a workplace free from hazards, offer appropriate training to workers, and ensure access to necessary personal protective equipment (PPE). We expect our suppliers to actively promote a culture of safety, regularly monitor and evaluate workplace conditions, and promptly address any potential health or safety concerns, to ensure the well-being of workers and maintain the highest standards of health and safety.

Environment

Recordati recognises the relevance of environmental protection and expects its suppliers to contribute positively to sustainable development in the areas where they operate. Suppliers are encouraged to minimise their environmental impact in full compliance with applicable laws and regulations. Efforts should focus on managing water and energy resources, reducing emissions and all form of pollution (including air, water, soil), proper waste management, combating climate change, and protecting biodiversity.

In addressing climate change, Recordati encourages suppliers to adopt sustainable practices, such as transitioning to renewable energy sources, implementing energy-efficient technologies, and optimising processes to reduce their carbon footprint. Suppliers are expected to progressively reduce greenhouse gas emissions across their operations and value chains.

Proper waste management is essential, particularly for hazardous substances, and must align with applicable laws and regulations. Suppliers are encouraged to reduce waste, prioritise recycling, and adopt a circular approach to optimise the use of raw materials.

Recordati also expects suppliers to maintain effective water management systems, particularly in water-stressed regions. Suppliers should prevent contamination, safeguard ecosystems, and ensure that their operations do not negatively impact the availability or quality of water for surrounding communities.

Research and Development

Recordati is committed to conducting research and development activities in accordance with good clinical and laboratory practices and legislation, guaranteeing compliance with the highest international standards. Suppliers such as service providers, including Contract Research Organisations (CROs), involved in these activities are expected to adhere to similar standards, ensuring participant well-being and compliance with legal and regulatory requirements.

Suppliers must also deliver appropriate training to their staff on procedures, protocols, and regulatory requirements to uphold research integrity.

Recordati uses animals in scientific experiments only when this is strictly necessary, that is when there is no alternative and when it is expressly required by the health authorities. In such cases, Recordati makes use of specialised centres which guarantee adherence to relevant national and supra-national legislation and which effectively implement the principles of the 3Rs: Replacement (using alternative methods), Reduction (minimising the number of animals used) and Refinement (protecting animal welfare).

Quality

At Recordati, we recognise the fundamental value that the value chain has in creating safe high-quality products.

Recordati is committed to guaranteeing product quality and safety throughout its value chain, from the research and development of new products to the procurement of raw materials and packaging, as well as the production, control, and commercialisation of registered medicines. To uphold these standards, all suppliers, including Contract Manufacturing Organizations (CMOs) and other partners, are required to adhere to stringent quality protocols that align with generally recognised industry standards and the specific contractually agreed quality requirements set forth by Recordati.

Suppliers must ensure that their goods and services consistently meet standards agreed to in writing between the Parties. This could include, for example, maintaining the efficacy, safety, and reliability of all products for their intended use. Suppliers must address any major issues that could affect the quality or safety of the goods and services provided.

In alignment with Recordati's dedication to compliance, all suppliers must respect anti-counterfeiting laws and refrain from any practices that disrupt the freedom of trade, including fraud, or the infringement of industrial and intellectual property rights.

REPORTING OF VIOLATIONS

Recordati promotes an open-door policy strongly encouraging good-faith communication of any alleged or proven violation of the Supplier Code of Conduct. In fact, whoever believes that there has been any breach of the law, of the Supplier Code of Conduct, or Code of Ethics, they may report such events, also anonymously, through the following channels, either via email or post:

How to make a report – Channels of communication

1. **Online Whistleblowing Portal:** Accessible through the public website under Governance - Compliance Programs.
Email: Ethics-advice@recordati.com
2. **Regular Mail:**
Group Internal Audit
c/o Recordati S.p.A.
Via Civitali, 1
20148 Milano, Italy

In addition, whenever a case of non-compliance with the present Code is ascertained by a supplier, the supplier itself is required to promptly inform Recordati and carry out the necessary corrective actions in order to remediate the incident and avert its re-occurrence.

Recordati reserves the right to interrupt and/or terminate the business relationship with the non-compliant supplier at any time, if deemed appropriate/reasonable, as well as to request compensation for damages where there are grounds, in the case of severe or repeated violations of the Supplier Code of Conduct, or failure to implement an improvement plan and/or failure to comply with any arrangements and timelines agreed upon.

Recordati strictly prohibits threats or any form of retaliation of any kind against any individuals because they report conduct reasonably believed to violate this Code, or in good faith provide information in connection with a report or investigation of any such conduct.

