

Third-Party Code of Conduct

1. Introduction

At Hovione, our commitment to excellence extends beyond our internal operations. We believe in principles of integrity, ethical conduct, and social responsibility and we expect our entire value chain, including without limitation suppliers, distributors, agents, and partners to share in these principles to collectively contribute to a sustainable and responsible business.

Hovione endorses the principles outlined in international standards such as the United Nations Guiding Principles on Business and Human Rights ("UNGPs"), UN Universal Declaration of Human Rights and International Labor Organization ("ILO") Declaration on Fundamental Principles and Rights at Work and other recognized best practices.

2. Purpose

Our Third-Party Code of Conduct (the "Third-Party Code of Conduct") serves as a framework for ethical behavior and responsible business practices within our value chain, including without limitation suppliers, distributors, agents, and partners ("Third-Party", "Third Parties"). The Third-Party Code of Conduct is an integral part of our commitment to conducting business with integrity, transparency, and respect for human rights.

This Third-Party Code of Conduct is based on the following key principles:

- I. **Global Alignment:** Our Third-Party Code of Conduct aligns with international standards and is influenced by globally recognized frameworks to ensure consistency and accountability.
- II. **Continuous Improvement:** We believe in a continual improvement approach, aspiring to enhance performance over time by integrating ethical considerations into everyday operations.
- III. **Legal Compliance:** While our Third-Party Code of Conduct sets high ethical standards, it does not replace local laws or agreements. We expect Third Parties to operate in full compliance with applicable laws, rules, and regulations.
- IV. **Collaboration and Influence:** we expect Third Parties to extend these

principles to their own suppliers, fostering a chain of responsible and ethical conduct throughout the broader business network.

Adherence to Industry Standards: We align our Third-Party Code of Conduct with the Principles of the Pharmaceutical Supply Chain Initiative (PSCI) ensuring a consistent approach to responsible Third-Party management.

3. Our Expectations

Hovione expects all Third Parties to acknowledge the principles outlined in this Third-Party Code of Conduct. We believe that by collectively upholding these standards, we contribute to a more sustainable, ethical, and responsible global business environment. Together, we can build a supply chain that not only complies with regulations but also advances societal concerns and ethical business behaviors.

4. Procedures

4.1 Human Rights Commitment: In accordance with UNGPs, it is our responsibility to identify, assess, and address any potential human rights risks or impacts present in our operations and supply chains.

Hovione extends its expectations to Third Parties, who are strongly encouraged to conduct human rights due diligence in accordance with the UNGPs, UN Universal Declaration of Human Rights and ILO Declaration on Fundamental Principles and Rights at Work.

We endorse the UNGPs' recommendation that companies of all sizes, sectors, and operational contexts conduct human rights due diligence. This proactive approach aims to prevent or mitigate risks to human rights linked to operations, products, or services through business relationships. Moreover, it encourages companies to participate in the remediation of human rights impacts they may cause or contribute to.

4.2 Labor Rights: Hovione requires Third Parties to conduct a risk assessment for their supply chain, following the standards outlined in the Third-Party Code of Conduct. Additionally, Third Parties are responsible for communicating the Third-Party Code of Conduct, or its own equivalent standards, to their own Third Parties and partners. Visibility into their supply chain and the adoption of responsible sourcing and

Third-Party Code of Conduct

purchasing practices are essential expectations.

The Third-Party Code of Conduct applies to all stakeholders in the Hovione value chain, encompassing workers both onsite and offsite, whether directly employed by Third Parties or through subcontractors, agencies, and other intermediaries. Hovione seeks to collaborate with Third Parties who uphold the following standards both in their own practices and relationships with their suppliers and partners, in each case in accordance with applicable laws, regulations and requirements:

- **Employment shall be Freely Chosen:**
 - All work is voluntary, free from slave, bonded, forced, or indentured labor, as well as any other forms of compulsory labor, slavery, or human trafficking.
 - Workers' original identification documents, travel documents, or any personal valuables are not surrendered unless required by law.
 - Throughout the recruiting and hiring process and during employment, employees are not required to pay any fees or deposits.
 - Employees enjoy freedom of physical movement and equal opportunities regardless of characteristics protected by law.
- **No Child Labor:** Children below the local minimum working age, the age of compulsory education or the ages set out in the ILO Core Conventions (whichever is higher) shall not be employed.
- **No Discrimination:** Discrimination at any time from recruitment to leaving employment for reasons such as race, national or ethnic minority status, ethnicity, color, age, sex, sexual orientation, gender, gender identity or expression, social origin, disability, religion, political affiliation, union or association membership, pregnancy, marital status, family status or any other protected category as defined by local laws is not tolerated.
- **Fair Treatment:** Third Parties shall treat workers with dignity and respect and provide a workplace free of harassment and with no threat of harsh and inhumane treatment. Workers neither face nor are threatened with bullying, sexual harassment, corporal punishment, any verbal, sexual, physical, or psychological abuse or coercion of any kind.

Regular Employment: Employment relationships should be established through contract on the basis of national law and best industry practice. Employment terms are communicated to workers in writing (paper or electronically) in a language they understand before they commence employment.

Fair Wages and Benefits: Wages and benefits should be fair and adequate. Wages and benefits for standard hours, excluding overtime, should meet national minimum requirements or industry benchmarks, whichever is higher. We strongly encourage all Third Parties to pay workers a living wage, benchmarked in the local market. Wages are not withheld or delayed, complying with all applicable laws and regulations.

Non-excessive Working Hours: Third Parties shall have a system in place to monitor the hours and wages paid to all staff, and complete hours and payroll records must be kept for all workers. Overtime hours shall not exceed the limits established in national applicable law or under collective agreements, whichever offers more protection to the worker. Where these do not exist, overtime hours shall be limited to the degree necessary to ensure the health and safety of workers. All overtime work must be consensual and not used to replace regular employment. Workers are given time off, breaks and appropriate leave in accordance with local laws, ILO standards, collective agreements and/or industry benchmarks, whichever offers more protection to workers.

Freedom of Association and Collective Bargaining: Employees' lawful freedom of association and legal rights to organize, form labor unions, seek representation and/or join workers' councils of their own choosing and collectively bargain are respected. Workers understand how to raise issues if they wish. Where collective agreements are in place, they are communicated to all workers in a language they can understand.

4.3 Health, Safety & Environment: Hovione expects each Third-Party to acknowledge the applicable HSE standards for its specific products or services. Third Parties shall comply with all applicable health and safety laws and regulations by providing a safe and healthy working environment and, if applicable, safe, and healthy company living quarters. The health and safety standards include:

Third-Party Code of Conduct

- **Risk Identification and control:** Third Parties shall have systems and programs in place for hazard identification, both occupational and process hazards including potential impacts on surrounding communities. They should assess risks from the identified hazards, while considering the effectiveness of existing controls and have programs and systems in place to prevent or mitigate these risks (e.g., catastrophic release, explosions, acute and chronic exposure, ergonomics, etc.), considering the hierarchy of controls.
- **Hazard Information:** Third Parties shall have programs and systems in place to provide Workers with safety information relating to hazardous materials and education to protect them from potential hazards. Hazardous materials can include but are not limited to raw materials, isolated intermediates, products, solvents, cleaning agents and wastes.
- **Worker Protection:** Third Parties must provide healthy and safe working environment for their employees, and any other stakeholders. It shall provide sufficient training to its Workers, establish preventive measures to avoid physical or mental fatigue and 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 company-provided living quarters.
- **Emergency Preparedness and Response:** Third Parties shall establish, implement, and maintain a process(es) needed to prepare for and respond to potential emergency situations, as identified on the Risk Identification.

4.4 Environmental Compliance and Sustainability: Third Parties are expected to comply with all relevant environmental laws and regulations. Additionally, they should strive for sustainability by minimizing their environmental impact, reducing resource consumption, and promoting the use of sustainable practices.

Third Parties shall support Hovione's sustainability goals, which include reducing Scope 1 and 2 greenhouse (GHG) emissions, improving transparency of Scope 3 GHG emissions.

- **Environmental Compliance:** Third Parties are expected to comply with the following:
 - **Environmental Authorizations:** Establish processes and systems to comply with environmental laws permits, licenses, and registrations, and adhere to operational and reporting requirements.
 - **Spills and Releases:** prevent and minimize spills and releases that may harm the environment and /or impact public health through hazard identified and risk design to mitigate loss of containment.
 - **Water Quality:** Third Parties involved in manufacturing pharmaceutical ingredients should manage effluents in line with industry best practices to avoid negatively impacting water quality in the receiving environment and demonstrate safe discharge levels of API.
 - **Waste and Emissions:** Third Parties must have processes in place for the safe handling, storage, recycling, reuse, and management of waste.
- **Environmental Sustainability:** Hovione aims to drive sustainability in its operations and across Third-Party operations Third Parties are expected to comply with the following standards:
 - **Procurement Responsibility:** Third Parties should strive to reduce carbon emissions, responsibly use water, continuously reduce waste, and adopt sustainable or low carbon impact materials for products and/or services where possible.
 - **Engagement and Roadmap:** Third Parties are expected to establish a sustainability roadmap for Hovione products and/or services. This includes setting goals for reducing greenhouse gas emissions, responsible water use, waste reduction, and sustainable or low carbon impact materials. Carbon Targets should align with the Paris Agreement 1.5° Reduction Pathway, and transparency in environmental practices and performance is essential. Third Parties should extend these standards to their Third Parties and supply chain.

Third-Party Code of Conduct

- **Data Sharing:** Third Parties are required to provide Hovione with product/service-specific environmental sustainability data aligned to the GHG Protocol and/or GRI standards for tracking performance. Upon request, Third Parties should have relevant environmental data available for verification by an independent Third-Party.
- **Supply Chain Responsibility:** Third Parties must actively minimize the environmental impact of their supply chain and allow Hovione to report their environmental sustainability data to independent third-party platforms in an anonymized form.
- **Sustainability and Resource Efficiency:** Third Parties should implement processes and systems to positively impact the climate, reducing the Hovione product carbon footprint, improve circularity, and efficiently assess and use natural resources such as water. They must ensure that their use of natural resources does not adversely affect community members' equity rights to water and an adequate standard of living.

4.5 Animal Welfare: Third Parties dealing with animal products or using animals in their operations must only purchase from sources approved by governments and accreditation bodies such as AAALAC International Practices that cause unnecessary harm or suffering to animals are strictly prohibited. Animals should be used only when there is a clear expectation that the results will benefit human or animal health and CIVM (Complex In Vitro Models), have been ruled out as an alternative to using animals for testing. Third Parties are expected to comply with all applicable laws, rules, and regulations regarding animal welfare standards, and reduce the use of animals for testing whenever possible.

4.6 Anti-Bribery and Fair Competition: Third Parties must conduct their business with integrity and comply with all applicable anti-bribery and anti-corruption laws. All Third-Party partners acting on our behalf or in connection with our business are prohibited from engaging in bribery, either towards public officials or private individuals, and are likewise prohibited from accepting any bribes. The use of intermediaries, including agents, advisers, distributors, or any other business

partners, for committing acts of bribery is strictly forbidden. Likewise, Third Parties must adhere to all relevant laws, regulations, and industry standards pertaining to anti-corruption. Fair competition principles must be upheld, including without limitation, in respect of practices which restrict competition or abuse a dominant position, and any form of corruption, bribery, or collusion is strictly forbidden. Third Parties shall employ fair business practices, including accurate and truthful advertising Third Parties, and shall comply with all applicable fair competition and antitrust laws and regulations.

4.7 Data Privacy and Information Protection: Third Parties are required to implement and sustain effective safeguards for the protection of personal data and information. This obligation extends to any Third Parties operating on their behalf. Conducting operations in compliance with relevant data protection and privacy laws, and adhering to industry standards for securing all information, including personal information, is expected from Third Parties. The following requirements must be fulfilled by Third Parties:

- **Proper Protection of Personal Information:** Third Parties must establish robust and appropriate systems and processes to keep information safe, confidential, and intact. This includes making sure data is protected from accidental, unauthorized, or unlawful loss, destruction, alteration, disclosure, use, or access.
- **Security Measures:** Third Parties must have clear policies and procedures for security, both technically and organizationally. Adequate measures must be implemented to safeguard data from unauthorized access, disclosure, alteration, and destruction.
- **Cross-Border Data Transfer Rules:** Third Parties must have plans in place to follow the laws that control the transfer of data across borders.
- **Data Breach Notification:** Any Third-Party which suspects or discovers a data breach related to the services or goods they provide to Hovione must promptly inform Hovione of the nature and extent of the same. Additionally, any such Third-Party should assist in any investigations related to such breach.

Third-Party Code of Conduct

4.8 Responsible Minerals: Third Parties are expected to comply with EU Conflict Minerals Regulation (Council Regulation (EU) 2017/821, corresponding Organization for Economic Co-operation and Development (OECD) Guidelines) and Swiss law provisions on due diligence and transparency regarding minerals and metals from conflict zones (conflict minerals), and to actively identify, minimize, and, whenever feasible, eradicate the use of specific minerals known as 3TG, which have been identified in Hovione products and found to have financially supported or benefited armed groups in the Democratic Republic of Congo (DRC) or its neighboring regions. Third Parties involved in the extraction, processing, or use of minerals must ensure that these activities do not contribute to human rights abuses or environmental harm. Responsible sourcing practices should be adopted to avoid conflict minerals.

4.9 Trade Sanctions and Export Controls: Third Parties shall identify and comply with applicable trade sanctions and export control laws, including but not limited to US, EU, and Swiss trade sanctions laws. Hovione does not engage with persons or companies that have been placed by the US, EU, or Switzerland on sanctioned party lists. Engaging in any activities that violate applicable international trade laws or restrictions is strictly prohibited.

4.10 Identification of Concerns and Management Systems: Third Parties should establish a grievance system, allowing their workers to identify, report, and resolve ethical concerns directly to the Third-Party without fearing retaliation or job loss. Additionally, Workers have the option to report actual or potential violations of the Third-Party Code of Conduct, the Human Rights Commitment Statement (HRCS), and other pertinent policies or relevant human rights and environmental laws and regulations in their country and/or in Hovione countries of operation through our Speak Up platform, accessible at <https://www.hovione.com/speak>.