

Two large overlapping circles are positioned in the lower-left quadrant of the page. The circle on the left is a dark blue color, and the circle on the right is a bright yellow color. They overlap in the center, with the yellow circle appearing in front of the blue one.

**SUPPLIER CODE**  
**of CONDUCT**

Formycon AG (“Formycon”) is a leading, independent developer of high-quality biosimilars, follow-on products of biopharmaceutical medicines. Formycon’s culture is characterized by an affirmative attitude towards integration, promotion of diversity and equality of opportunity. Formycon is firmly committed to its policy of non-discrimination with the goal of fostering an open working environment in which creativity and individuality can thrive. In its corporate culture and management culture, Formycon thus attaches particular importance to a spirit of mutual trust, thereby encouraging a free and open exchange of views spanning the entire organization, across all levels. Formycon views this open, candid and agile work environment as crucial for shared success. The aim is to foster a culture of good management and strong leadership, characterized by values, empowerment and accountability, as essential to achieving Formycon’s business goals.

Together, we are doing everything we can to prevent and avoid breaching applicable laws and to protect human rights and the environment. We expect our suppliers to observe the principles of social, environmental and ethical conduct set out in this Supplier Code of Conduct (“Supplier CoC”). These principles form the basis for all future sup-

plies of goods and services. Suppliers must comply with and implement these principles in their own business and endeavor to oblige their own supply chain to comply with and implement these standards. The Supplier CoC is therefore aimed at all our suppliers. The principles stated here form the basis of the contractual relationship.

This Supplier CoC is based, amongst others, on the 10 Principles of the United Nations (UN) Global Compact, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the Conventions of the International Labor Organization (ILO), particularly its fundamental rights at work.

We would be happy to engage with you on this and support you with any questions of concerns you might have.

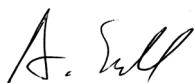
**We are counting on your support!**



**Dr Stefan Glombitza**



**Nicola Mikulcic**



**Dr. Andreas Seidl**



**Enno Spillner**



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# ABBREVIATIONS





<b>CERLA</b>	Comprehensive Environmental Response, Compensation, and Liability Act
<b>GCP</b>	Good Clinical Practice
<b>ILO</b>	International Labor Organization
<b>OECD</b>	Organization for Economic Cooperation and Development
<b>REACH</b>	The Registration, Evaluation, Authorization and Restriction of Chemicals Regulation
<b>RoHS</b>	The Restriction of Hazardous Substances Directive
<b>UN</b>	United Nations

# **SOCIAL RESPONSIBILITY**





Our Suppliers are required to respect internationally recognized human rights.

### **I. Prohibition of forced labor**

Formycon does not accept forced labor, slavery, slavery-like practices, servitude or other forms of domination or oppression in the workplace environment, such as extreme economic or sexual exploitation and humiliation. Both Formycon and its suppliers must comply with the recommendation in the ILO conventions concerning Forced or Compulsory Labor (C029 - Forced Labor Convention, 1930 (No. 29), Protocol of 11 June 2024 to Convention No. 29 and C105 - Abolition of Forced Labor Convention, 1957 (No. 105)). Any work must be performed freely and without threat of punishment. Suppliers ensure that employment relationships allow employees to give notice of their own volition in observance of a reasonable notice period. Practices such as withholding personal property, passports, wages, employment certificates or other documents for unreasonable reasons are unacceptable. Corporal punishment, threats of physical violence, psychological cruelty, sexual or other forms of harassment and intimidation are prohibited.

The hiring or use of security guards is not permitted if their deployment would lead to inhumane or degrading treatment of or injury to people or would impair freedom of association.

## II. Prohibition of child labor

Formycon does not accept child labor. Both Formycon and its suppliers comply with the recommendation in the ILO conventions on the minimum age for the employment of children (C138 - Minimum Age Convention, 1973 (No. 138) and C182 - Worst Forms of Child Labor Convention, 1999 (No. 182)). According to that recommendation, the minimum age may not be less than the age at which compulsory school attendance ends under the law of the place of employment and, in any case, not less than 15 years.

If children are found in a workplace, the measures to be taken to remedy the situation must be documented. The rights of young workers must be protected. Persons under the age of 18 may not be employed in work which is harmful to children's health, safety or morals. Special protective provisions must be observed.

## III. Fair pay

Remuneration for regular working hours and overtime must comply with the national statutory minimum wage or the customary minimum remuneration for the relevant industry, whichever is higher. If the remuneration is insufficient to cover the ordinary cost of living while allowing employees to accumulate a minimum amount of savings, the remuneration must be increased. Employees must receive all benefits prescribed by law. Pay deductions must not be used as a disciplinary measure. Employees must regularly receive clear and detailed written information on the composition of their pay.

Without exception, remuneration must be paid regularly, punctually and in full.

#### **IV. Fair working hours**

Suppliers are required to comply with applicable local laws and ILO regulations on working hours (e.g. C001 - Hours of Work (Industry) Convention, 1919 (No. 1)). Employees must be provided with sufficient breaks.

#### **V. Freedom of association**

Suppliers are expected to respect the right of employees to form or join organizations of their own choosing and to engage in collective bargaining and strikes. Both Formycon and its suppliers comply with the recommendation in the international Standards and ILO conventions (C087 - Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87), C098 - Right to Organize and Collective Bargaining Convention, 1949 (No. 98) and International Covenant of 19 December 1966 on Civil and Political Rights).

In cases in which freedom of association and the right to engage in collective bargaining are restricted by law, employees must be given alternative opportunities to associate freely and independently for the purpose of collective bargaining. Employees must not be discriminated against on the basis of founding, joining or being a member of such an organization. Employee representatives must be protected against discrimination.



## **VI. No discrimination**

Suppliers ensure that all forms of discrimination intimidation, harassment, unequal treatment or unwarranted disadvantage towards their employees and in the work environment are avoided. Both Formycon and its suppliers comply with the recommendation in the international Standards and ILO conventions (C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111), International Covenant of 19 December 1966 on Civil and Political Rights and International Covenant of 19 December 1966 on Economic, Social and Cultural Rights).

This applies, for example but not limited, to discrimination based on gender, race, ethnic or social origin, skin color, disability, health status, political convictions, trade union membership, national origin, ideology, religion, age, pregnancy, marital status or sexual orientation. The personal dignity, privacy and rights of personality of each individual must be respected.

## **VII. Diversity and inclusion**

Suppliers should develop and provide a working environment that recognizes and supports inclusion and diversity. Diversity and an inclusive culture shall be promoted among all employees at all hierarchical levels, in particular, but not exclusively, cultural, ethnic and religious diversity.



### **VIII. Health and safety in workplace**

Formycon complies with the applicable local laws on occupational safety and health and expects its suppliers to do the same. Both Formycon and its suppliers comply with the recommendation in the international Standards (International Covenant of 19 December 1966 on Civil and Political Rights and International Covenant of 19 December 1966 on Economic, Social and Cultural Rights).

Suppliers take the necessary precautions to prevent accidents and injuries that may occur in connection with workplace activities. Excessive physical or mental fatigue must be prevented through suitable measures. In addition, suppliers train and instruct their employees regarding applicable health and safety standards and regulations. Employees will be provided with access to adequate quantities of drinking water and clean sanitary facilities.

### **IX. Preservation of livelihoods linked to natural resources**

Suppliers will not, in violation of legitimate rights, extract resources from land, forests or waters, whose use secures the livelihood of people. Suppliers will refrain from harmful alterations to the soil, water and air pollution, noise emissions and excessive water consumption if this harms the health of people, significantly impairs the natural basis for the production of food or prevents people's access to safe drinking water or sanitary facilities.

Both Formycon and its suppliers comply with the recommendation in the international Standards (International Covenant of 19 December 1966 on Civil and Political Rights and International Covenant of 19 December 1966 on Economic, Social and Cultural Rights).

# **ENVIRONMENTAL RESPONSIBILITY**



Our Suppliers are required to take appropriate measures to protect the environment.

### **I. Treatment of waste**

Local regulations and laws governing the generation, storage, disposal and recycling of waste, waste gases and wastewater must be observed, in particular the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, as amended. Suppliers must minimize as far as possible the generation of waste, wastewater and emissions.

### **II. Use of natural resources and consumption of raw materials and biodiversity**

Natural resources must be used sparingly and preserved as far as possible. The use and consumption of resources during production and the generation of waste of any kind, including water and energy, must be reduced or avoided. The use of natural resources is to be reduced through practices such as using alternative materials or reducing, sharing, maintaining, reusing, reprocessing or recycling materials or changing production processes. Suppliers are committed to the ongoing development and use of environmentally and

climate-friendly products, processes and technologies. Applicable laws and regulations that prohibit or restrict the use of certain substances in production must be strictly adhered to, and labels for recycling and disposal must be applied. Negative impacts on the environment and the climate must be identified and halted as quickly as possible. Furthermore, suppliers are required to assess their activities for significant environmental impacts and to establish effective policies and procedures to use natural resources as efficiently as possible.

Our Suppliers shall also consider the protection of biodiversity and ecosystems, i.e. the natural environment in which the Supplier operates, including air, water, land, natural resources, flora, fauna, humans and their interrelationships.

### **III. Pollution**

Suppliers must comply with national and local environmental laws, regulations and standards, such as RoHS (The Restriction of Hazardous Substances Directive) and REACH (The Registration, Evaluation, Authorization and Restriction of Chemicals Regulation), Clean Air Act, Clean Water Act, CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act). Suppliers must protect their employees, contractors and the environment from exposure to harmful quantities of hazardous substances. This includes the assessment of any hazardous substances needed prior to use, and that control measures are adopted, serviced and maintained.







**ETHICAL CONDUCT AND  
BUSINESS INTEGRITY**

Suppliers shall conduct their business in accordance with the highest ethical standards. The specifications given here must be adhered to at all times. Should there be any divergences between the standard of the suppliers and the specifications stated here, please inform us accordingly.

#### **I. Bribery and acceptance of benefits**

All bribery, corruption, extortion and embezzlement practices are prohibited. Suppliers are prohibited from offering or accepting gifts, kickbacks, gratuities, hospitality or other favors for the purpose of obtaining an advantage in business dealings. Suppliers shall not cooperate with health care professionals in a way that has an inappropriate influence or could be seen as an improper influence.

Suppliers are obliged to comply with all laws and regulations applicable in the countries in which they operate or conduct business. This includes in particular the provisions of German law on bribery and corruption, the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and the OECD Convention on Combating Bribery in International Business Transactions.

## II. Fair competition

Suppliers must comply with the applicable antitrust and competition laws. They are prohibited from engaging in anti-competitive agreements, especially in order to influence prices or conditions, and/or abusing a dominant market position.

## III. Data protection and confidentiality

Any information provided or obtained, including but not limited to personal data provided or obtained, may only be processed for legitimate business purposes, for a specific purpose and in a manner that ensures the information or personal data is adequately protected. Data must be protected against unauthorized or unlawful processing and against accidental loss, destruction or damage. For this purpose, suitable and state-of-the-art technical and organizational measures must be implemented. All relevant legal requirements for data protection and information security must be complied with.

Should a breach of data protection nevertheless occur (e.g. also due to a cyber-attack), the supplier must inform Formycon immediately. A corresponding notification must be sent to our IT department (IT@formycon.com).



#### **IV. Intellectual property**

The know-how, patents and trade and business secrets of Formycon must be protected and respected. Such information must not be disclosed to third parties without Formycon's prior expressed written consent or disclosed in any other unauthorized manner. Confidential information may not be used except for the purpose for which it was provided. Copying of confidential information is prohibited.

#### **V. Money laundering and terrorist financing**

Suppliers ensure compliance with the provisions on preventing money laundering and terrorist financing and refrain from engaging in any transactions that serve these purposes.

**VI. Import - and export controls**

The applicable foreign trade and customs laws and regulations shall be complied with. Suppliers shall inform Formycon immediately if a delivery/ service is wholly or partially subject to import or export restrictions under national law, EC regulations or other international embargo and export regulations.

**VII. Conflicts of interest**

Suppliers must avoid conflicts of interest in connection with work performed for Formycon or in collaboration with Formycon. Decisions must therefore be made solely on the basis of objective considerations. Personal interests should not guide decisions.

Formycon must be informed in advance of potential conflicts of interest (e.g., private connections).



## **VIII. Animal welfare**

Animals must be treated respectfully and ethically, and animal testing must be kept to an absolute minimum. Before each study, careful evaluation must take place, especially regarding the purpose of the study, the effects on the animals and the reasons why results cannot be obtained otherwise. The application of tests on animals will only take place, if this is required by mandatory regulations or results cannot be achieved through an alternative method. Unnecessary harm, stress or pain to the animals must be avoided. Furthermore, animals are kept with optimal hygiene and adequate veterinary care.

Suppliers ensure compliance with applicable animal welfare laws and regulatory standards and will only use animals that were bred for the purpose of testing and were acquired through reliable vendors. Furthermore, all employees that partake must be properly trained and qualified in the conduct of animal studies.

## **IX. Human Biospecimens**

Suppliers are expected to comply with all applicable laws, rules and regulations governing human biospecimens and to ensure that informed consent (and where appropriate, assent) for human biospecimens has been obtained.

**X. Pharmacovigilance**

In order to ensure the collection and reporting of safety data/adverse drug reactions in the conduct of services and activities related to medicinal products, the applicable laws and regulations on pharmacovigilance (drug safety) and the corresponding agreements must be complied with.

**XI. Good clinical practice**

If clinical trials are conducted on behalf of Formycon, they must be carried out in accordance with the global standards of Good Clinical Practice (GCP), the applicable national and local regulatory requirements and with the greatest possible consideration for the health and safety of the participants.





# COMPLIANTS MECHANISM



The suppliers are responsible for establishing an effective complaints mechanism. The complaints mechanism must be accessible to individuals while maintaining confidentiality of identity and effective protection against discrimination. Complaints and concerns must be followed up and corrective action taken if needed. All suppliers guarantee that individuals filing complaints will not be subject to reprisals or disciplinary action.



