CODE OF CONDUCT FOR SUPPLIERS





About SGD Pharma

SGD Pharma is recognised as one of the world's leading suppliers of glass pharmaceutical packaging. Our organisation has a production network across Europe and Asia.

SGD Pharma firmly believes that, in order to consolidate its leading position and continue to supply glass of the highest quality, a strong commitment and a strategic approach to social responsibility are essential for managing the challenges and opportunities in an ever-changing global environment.

To this end, SGD Pharma has developed a Code of Ethics and Conduct to underpin an ethical and sustainable corporate policy that governs all business activities and employees.

SGD Pharma's suppliers also play a major role in the success of our business model and our sustainable development. SGD Pharma is committed to conducting business with suppliers who share our commitment to high ethical standards and who act responsibly and ethically.

SGD Pharma expects all its suppliers to share and comply with the principles set out in this Supplier Code of Conduct. It is fully in line with our vision and has been developed in accordance with the principles set out in the United Nations Global Compact.



Supplier Commitment

The provisions of this Supplier Code of Conduct set out SGD Pharma's requirements for all suppliers with whom it has a business relationship. SGD Pharma requires the supplier, its subsidiaries or affiliated companies, and their own supply chains of subcontractors to comply with these principles. SGD Pharma encourages the supplier to require its own suppliers to comply with these conditions. The supplier and its employees are required, as a minimum, to comply with the requirements set out in this Supplier Code of Conduct or with the laws and regulations in force in each of the jurisdictions in which the supplier operates, if these are more stringent.

SGD PHARMA

Ethical Compliance

Suppliers must conduct their business ethically and act with integrity. SGD Pharma requires its suppliers to comply with all statutory and regulatory requirements relating to ethical compliance, namely:

Prevention of conflicts of interest

The supplier and its employees must act exclusively in the interests of their company and must refrain from having a personal interest or from using their position to obtain benefits for themselves or for third parties. SGD Pharma requires its suppliers to declare any conflict of interest that could affect the quality of the contracts and service agreements entered into with them by SGD Pharma. To this end, the Supplier must complete the 'Declaration of Conflict of Interest' set out in the appendix.

Corruption and influence peddling

The Supplier undertakes to comply with the principles set out in this Code, including SGD Pharma's rules on gifts and hospitality, as well as all applicable laws and regulations relating to the fight against corruption and influence peddling, in particular the French Sapin II Act, the US Foreign Corrupt Practices Act ('FCPA'), and any other applicable local legislation. SGD Pharma's anti-corruption policy, available via the following link: *Certification & documentation - SGD Pharma*, sets out the principles and standards of conduct applicable to the prevention and combating of corruption within the Group. The Supplier shall refrain from any form of corruption, influence peddling, fraud or unethical practice and shall ensure that accurate and complete accounting records are maintained.

The Supplier shall implement appropriate measures to prevent and detect such risks, including within its supply chain. The Supplier shall, without delay, inform SGD Pharma of any proven or suspected breach, in good faith, of these obligations or of any situation involving a conflict of interest that may affect the commercial relationship between the parties.

Compliance with the principles of free competition

Suppliers undertake to comply strictly with applicable laws and regulations relating to competition law and to refrain from any practice likely to undermine free competition.

Conflict minerals

Suppliers must investigate and report on the presence and use of conflict minerals in parts, components or materials supplied to SGD Pharma (e.g. coltan, cassiterite, gold, wolframite and their derivatives: tantalum, tin and tungsten, etc.).

Animal welfare

SGD Pharma strongly supports animal welfare and encourages its suppliers to avoid, as far as possible, any experimentation or procedures involving animals. Alternative methods must be prioritised provided they are scientifically valid and acceptable to legislators. Animal testing must only be carried out if alternative methods have been carefully considered and are not feasible. Suppliers must treat animals humanely and with a view to minimising their pain and stress.

Data protection

Suppliers must comply with all applicable laws and regulations regarding the protection of personal data and privacy, in particular the General Data Protection Regulation (GDPR) where applicable. They must implement appropriate technical and organisational measures to ensure the security, confidentiality and integrity of personal data. Personal data must only be collected, used, stored or processed to the extent necessary for the performance of the requested services and in accordance with the company's instructions or applicable legal requirements. Suppliers must also notify the company without delay of any security incident or personal data breach and ensure that any transfer of data outside the European Union is carried out in accordance with applicable regulations.

International Restrictions and Sanctions

Suppliers undertake to comply strictly with all applicable laws and regulations relating to international trade, including, but not limited to, those relating to export and import controls, embargoes, and applicable economic and financial sanctions regimes.

Ethical compliance

Supplier Site Visit Procedure

Suppliers will receive* a mutual non-disclosure agreement (NDA) form, which must be completed and signed by each party before any visit to SGD Pharma's premises takes place.
The supplier must be officially registered and in possession of an access badge (which must be visible at all times whilst on SGD Pharma's premises) in order to be authorised to be on SGD Pharma's premises.

Suppliers must be accompanied by an SGD Pharma procurement manager or an SGD Pharma representative at all times whilst on SGD Pharma's premises.

Suppliers are not permitted to occupy the office or cubicle of an SGD Pharma employee without presenting official identification issued by SGD Pharma.

Upon leaving SGD Pharma's premises, suppliers must hand in their visitor badge at reception.

Whistleblowing procedure

SGD Pharma encourages all its stakeholders (suppliers and their employees, its own employees and its customers) to come forward and report any actions by any person or party of which they become aware and which may constitute an act of corruption, a crime or offence, a breach of international regulations, a breach of the Code of Conduct and Professional Ethics, or a threat or potential harm to the public interest, without this resulting in any adverse consequences for the person reporting such acts.

These individuals may contact us directly or via our whistleblowing platform.

The hotline number is:
- Germany: 0800-1810898
- China: 400-120-3520
- United States: 400-120-3520
- France: 0800-916095
- India: 000800-1004073
- Italy: 1800-218-8954

Code to report an issue to SGD Pharma: 4899#

The address of the whistleblowing platform is:
https://report.whistleb.com/en/sgdpharma



*Available on request by emailing: legaldepartment@sgdgroup.com

Human rights and labour rights

Suppliers must undertake to respect workers' human rights and to treat them with respect and dignity. SGD Pharma complies with applicable international standards and conventions and requires its suppliers to do the same, in particular with regard to standards relating to:

Forced labour

SGD Pharma requires its suppliers to refrain from using forced labour, bonded labour, servitude or involuntary prison labour.

Child labour

SGD Pharma does not use child labour and requires its suppliers to adhere to the same policy. In accordance with the standards to which SGD Pharma adheres, any person is considered a 'child' if they are under 15 years of age or if, under local legislation, they are entitled to attend school or receive full-time education and such work interferes with their schooling. A child must not be permitted to work at night or in hazardous conditions.

Working hours, wages and benefits

Working hoursmust comply with the provisions of the current national legislation in force in the relevant jurisdiction. Suppliers must pay their employees in accordance with applicable national laws on the minimum wage, overtime and social benefits.

Respect and dignity

SGD Pharma requires its suppliers to treat their employees with respect and dignity and strictly prohibits any form of physical or psychological violence, threats of physical violence, sexual abuse, physical or psychological harassment, and any other form of intimidation.

Freedom of association

Suppliers are required to recognise the principle of freedom of association and the right to collective bargaining.

Discrimination

SGD Pharma supports diversity and equality in employment. Suppliers are required to ensure equality in employment, pay, career progression and disciplinary measures, regardless of ethnicity, origin, religion, nationality, age, gender, disability, political beliefs or physical appearance... (non-exhaustive list).

Health and safety

SGD Pharma requires its suppliers to ensure optimal health and safety conditions for their employees. As a minimum, the supplier must comply with all applicable health and safety laws, regulations and standards.

Protection of Workers

Suppliers are required to protect their employees from chemical, biological and physical hazards, and must not unreasonably require them to perform physically demanding tasks in the workplace or in other facilities and transport vehicles provided by the company. Suppliers must implement controls, safe working procedures and technical protective measures with the aim of minimising occupational health and safety risks. Where necessary, suppliers must provide their employees with suitable personal protective equipment (PPE).

Process safety

Suppliers are required to implement programmes designed to prevent or mitigate catastrophic chemical spills or other identified major risks.



Emergency preparedness and response in the event of an emergency

Suppliers must identify and assess emergency situations and minimise their impact by developing and implementing emergency plans and response procedures.

Risk information

Safety instructions relating to hazardous products must be available to inform, train and protect workers from occupational risks.

SGD Pharma encourages its suppliers to:

- Communicate to their management, employees and suppliers their commitment to improving health and safety, and provide training on these commitments.
- Obtain and maintain ISO 45001 certification or an equivalent standard, systematically assess their health and safety performance through appropriate audits, and monitor progress.

Environment

Suppliers must operate in an environmentally efficient and responsible manner, striving to minimise any negative impact on the environment. Suppliers are encouraged to conserve natural resources, avoid the use of hazardous products and engage in reuse and recycling activities.

Environmental Permits

Suppliers must comply with all applicable environmental laws, regulations and standards. They are required to obtain all necessary environmental authorisations, as well as any mandatory licences, approvals and declarations to the authorities, and to comply with all operational and reporting requirements.

Climate change

Since 2005, SGD Pharma has implemented various measures aimed at reducing greenhouse gas emissions. SGD Pharma requires its suppliers to also reduce or eliminate practices that have a negative impact on the climate at source (e.g. recycling or reuse, substitution of raw materials, use of low-carbon energy and energy efficiency, changes to production processes, etc.).

Resource efficiency

Suppliers must put systems in place to optimise the use of all relevant resources (e.g. energy, water, materials, etc.) in a sustainable manner.

Waste and emissions

Suppliers must put systems in place to ensure the safe handling, transport, storage, recycling, reuse or management of waste and atmospheric emissions. All waste, waste water and emissions that could potentially have a negative impact on human or environmental health must be managed, monitored and treated.

Spills and discharges

Suppliers must put systems in place to prevent and reduce accidental spills and discharges into the environment.

SGD Pharma encourages its suppliers to:

- Communicate their commitment to improving the environment and provide support and training to their management, employees and suppliers so that they can fulfil these commitments.
- Obtain and maintain ISO 14001 certification or an equivalent standard, systematically assess their environmental performance through appropriate audits, and monitor progress.

Management System

Suppliers must undertake to implement management systems with the aim of facilitating compliance with all applicable laws and regulations and with a view to continuous improvement.

Commitment and Responsibility

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

Legal and customer requirements

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

Risk Assessment and Management

Suppliers must put in place mechanisms to identify, assess and manage risks in all areas covered by this Supplier Code of Conduct and by the applicable legal requirements.

Documentation

Suppliers must maintain adequate documentation to demonstrate that they share the principles and values set out in this document and that they comply with their regulatory and contractual obligations.

Training and Competence

Suppliers must establish appropriate measures and training programmes to ensure that their managers and employees achieve a practical level of understanding and knowledge of this Supplier Code of Conduct, as well as the applicable laws, regulations and standards.

Business Continuity

Suppliers are responsible for developing and implementing business continuity plans tailored to operations related to those of SGD Pharma.

Continuous Improvement

SGD Pharma requires its suppliers to strive for continuous improvement by setting performance targets, drawing up implementation plans and taking the necessary corrective action to address any significant shortcomings identified.

SGD PHARMA

SGD Pharma
Code of Conduct for Supplier

Declaration regarding conflicts of interest

To the best of your knowledge, is there currently any actual, potential or perceived conflict of interest between your company (or any of its directors, employees, representatives or subcontractors) and SGD Pharma that could influence, or appear to influence, the objectivity, independence or integrity of our business relationship?

☐ No

☐ Yes (if so, please describe the situation and the measures put in place to manage it):

.....

.....

Compliance Undertaking

I certify that our company has received, read and understood SGD Pharma's Supplier Code of Conduct and that we will comply with it should we be selected as a supplier to SGD Pharma.

COMPANY NAME:

LEGAL REPRESENTATIVE:

POSITION:

COMPANY STAMP:

DATE:

SIGNATURE:

Appendices

Please find below examples of best practices and prohibited practices, which apply equally to both the SGD Pharma procurement team and its suppliers.

GOOD PRACTICES 

- Refuse any valuable gift from a supplier.
- Accept and benefit from hospitality programmes (meals, entertainment), provided that they serve a legitimate business purpose and that the expenses are reasonable, proportionate and transparent.
- Accept an invitation to a trade fair from a supplier.
- Inform your line manager and the Legal Department if a bribe is offered.

PROHIBITED PRACTICES 

- Offering a sum of money to a public official in order to obtain a licence or permit.
- Offering a sum of money, however small, to a customs officer in order to speed up the customs clearance of the company's equipment.
- Recruiting an employee at the request of a public authority.
- Offering a gift to a buyer in order to influence or secure a contract. A buyer requesting money from a supplier in exchange for the award of a contract.
- Obtaining or accepting a kickback in exchange for favourable terms or a contract.
- An agent or commercial intermediary acting on behalf of your company offering or receiving, directly or indirectly, an undue advantage in the course of their activities.
- Using the political connections of an employee who is a local elected representative to obtain an exploration licence or planning permission in their municipality, or any other undue advantage.
An employee receiving a benefit from a supplier with the aim of influencing the tendering process in their favour.
- Illegally disclosing strategic information about a project in exchange for a favour.
- Awarding a contract to a company simply because it is owned by a family member of your colleague, who is responsible for the contract.
- Paying a sum of money to a trade union to prevent a strike that could bring business operations at one of your company's sites to a standstill.
- Sponsoring an SGD Pharma employee and/or the show or sports club of an SGD Pharma employee's family.

Be vigilant, as corruption can be **'active'** (offering, promising or granting) or **'passive'** (soliciting or agreeing to receive an undue advantage).

SGD
PHARMA

People / One Team / Excellence / Customer

www.sgd-pharma.com

@sgd_pharma @SGD Pharma SGD Pharma



SGD Group · S.A.S. with share capital of €213,192,063 – Registered in the Nanterre Trade and Companies Register under number B 494 163 876 – Registered office: Liberty Tower, 17 Place des Reflets, 92097 Paris La Défense Cedex, France · Tel.: **+33 (0)1 40 90 36 00**