

## **SUPPLIER CODE OF CONDUCT**

### **Purpose**

Newbury Pharmaceuticals AB is committed to corporate social responsibility (CSR) that applies ethical standards. Social responsibility is important to us when we select suppliers and products. We have adopted a Supplier Code of Conduct that explains our guidelines for responsible sourcing. The aim of this Code of Conduct is to support the growth of a responsible and profitable business with our suppliers and partners.

### **General principles and scope of application**

This Code of Conduct is based on the UN Global Compact and its ten principles on human rights, labor rights, climate and environment, and anti-corruption. The Ten Principles of the United Nations Global Compact are derived from: the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

Suppliers are expected to support our CSR endeavors and adhere to the principles laid down in this Supplier Code of Conduct. The Code of Conduct forms part of the cooperation with all suppliers and entities supplying goods and services to Newbury. It is the responsibility of the suppliers to ensure that their sub-contractors do not violate the standards of this code.

### **Compliance and continuous improvement**

Suppliers shall ensure compliance with the above-mentioned principles via a Code of Conduct. Suppliers should adopt policies covering human rights, labor rights, climate and environmental matters, anti-corruption, and define due diligence processes for each area. This also encompasses the designation of a competent person as responsible for coordinating efforts to improve on human rights and labor rights, climate and environmental matters and anticorruption. Upon request, suppliers shall document compliance with obligations set out in this Code of Conduct. Moreover, suppliers shall undertake all reasonable efforts to ensure that agents and sub-contractors comply with the requirements of this Code of Conduct.

### **Human Rights and Labor Rights**

Suppliers shall respect human rights and labor rights in all parts of their operations. They shall avoid causing and contributing to human rights and labor rights infringements throughout their value chain, including with their sub-suppliers or contractors.

### **Freely chosen employment**

Suppliers must ensure that no forced, bonded or involuntary labor is employed and involved in any activities under the cooperation.

Suppliers may not require workers to lodge identity papers or similar deposits with the employer. All workers shall be free to leave their employer after reasonable notice. All workers with suppliers and their

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sub-suppliers must have a legal right to work and must be validated through review of original documentation.

### **Inhumane and degrading treatment**

Suppliers shall ensure that physical, verbal, sexual or psychological harassment, abuse or threats, is prohibited in the workplace, including when determining and implementing disciplinary measures which may never be collectively imposed.

### **Privacy and an adequate standard of living**

Suppliers shall ensure respect for privacy and protection of family life, home and correspondence of workers. This includes respecting free settlement, protection of family life and home, as well as ensuring an adequate standard of living and housing.

### **Child labor and young workers**

Suppliers may in no event employ or use children in any type of labor, in any part of the value chain, or with sub-suppliers and contractors. The minimum age for employment shall not be less than the age of completion of compulsory schooling and, in any case shall not be less than 15 years (or 14 years where established by national laws in accordance with the ILO developing-country exception). Suppliers shall refrain from hiring young workers below the age of 18 to perform any type of work that is either prohibited for young workers by law or is likely to jeopardize their health, safety and/or morals.

### **Non-discrimination and equal opportunities**

Suppliers shall eliminate discrimination, including any distinction, exclusion or preference made with reference to race, color, sex, language, religion, political opinion, caste, national or social origin, property, union affiliation, sexual orientation, health status, age, disability or other distinguishing characteristics. Any employment-related decision shall be based on relevant and objective criteria.

### **Just and favorable working conditions**

#### Contracts and wages

All workers shall be provided with a written, understandable and legally binding labor contract or similar employment documentation as required by local legal standards. In addition, all workers shall be properly informed about their wages and pay periods in an easily understandable form. Suppliers shall ensure that wages and benefits paid for a standard working week meet, at a minimum, national legal standards. Wages shall be paid in legal tender and on a regular basis. Deductions from wages as a disciplinary measure shall not be permitted.

#### Working Hours

Suppliers shall ensure that working hours comply with national laws and collective agreements or other standards, whichever provides better protection for workers. This also applies to sub-suppliers and contractors. All overtime beyond 48 hours per week shall be limited, properly compensated and

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fairly distributed among workers. Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

#### Health and safety

Suppliers shall provide a safe and hygienic working environment and shall take adequate steps to prevent accidents and injuries to health. This should be done by minimizing, so far as is reasonably practicable, the causes of hazards in the working environment. All workers shall receive regular and recorded health and safety training and the supplier shall provide its employees with the necessary protective equipment to perform their tasks safely. Access to clean toilet facilities and to potable water and, if appropriate, sanitary facilities for food storage shall be provided for. Accommodation, when provided by suppliers and their sub-suppliers or contractors, shall be clean, safe and meet the basic needs of the workers.

#### **Unions and collective bargaining**

Suppliers shall ensure that workers have the right to join or form trade unions of their own choice and recognize the right to collective bargaining. Suppliers shall adopt an open attitude towards the activities of trade unions and their organizational activities. Representatives of workers must not be discriminated due to their functions in the workplace and suppliers shall ensure that they have access to carry out their representative functions.

#### **Freedom of expression and access to information**

Suppliers shall ensure respect for the freedom to express opinions and to access information relevant for running operations to the widest extent possible.

#### **Environment and climate**

On sites, suppliers shall assess the negative impacts of their operations, products, and services, based on continuous monitoring and regular reviews of consumption and discharge of natural resources, including consumption of energy, fuel, electricity and water, and of greenhouse gas emissions. Suppliers must be able to demonstrate that they comply with national laws on environmental protection and have all the relevant and valid permits, including permits for the consumption and disposal of water, waste, and chemicals. Suppliers shall make continuous improvements in their environmental performance and actions towards climate change by undertaking initiatives to promote greater environmental responsibility and engage in environmentally friendly technologies.

#### **Good business ethics**

Suppliers shall conduct their business responsibly and refrain from corruption in all its forms, including extortion and bribery, unfair competition or any type of fraudulent business practice. Suppliers must be able to demonstrate that they comply with all relevant national legislation on these matters and ensure that employees, whose positions carry a higher level of actual

and potential risks of corruption, are trained in anti-corruption standards.

#### **Reporting and remediation**

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Suppliers shall have a transparent system in place for stakeholders to confidentially report and submit complaints on violation of any of the above-mentioned points. Submitting reports and complaints should be easily accessible and shall be ensured without any fear of reprisals towards the reporter or complainant. If suppliers identify practices or behavior in their own operations, or with sub-suppliers or contractors, causing or contributing to negative impacts, they should actively try to remedy the problem. Remediation processes may be carried out either by the suppliers or in cooperation with external parties.

### **Notification of incidents**

Suppliers must notify Newbury of identified incidents and violations of this Code of Conduct within 24 hours either via the supplier's point of contact at Newbury or via confidential reporting to [info@newburypharma.com](mailto:info@newburypharma.com). If non-compliance is identified, Newbury may support the drafting of an improvement plan to ensure that compliance will be obtained within a reasonable timeframe. If compliance is deemed impossible or suppliers do not show any willingness or ability to mitigate or prevent the identified negative impact, Newbury reserves the right to dissolve the contract.

Lund, June 2022

Lars Minor