



GLOBAL SUPPLIER CODE OF CONDUCT

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INTRODUCTION

At Apotex, our purpose is improving access to medicines for millions of patients worldwide by providing affordable, innovative and high-quality solutions. We are committed to acting ethically and responsibly and we know that this is key to our success. The third-party individuals, organizations, and their subcontractors (“Suppliers”) that we engage with to provide goods and/or services must share this same commitment for us to fulfill our purpose.

This Global Supplier Code of Conduct (“Supplier Code”) sets out our expectations for Suppliers in the areas of ethical business practices, labour and human rights, health and safety, environmental management and supply chain management.

In addition to complying with applicable laws and regulations and any agreed upon contract, Apotex expects that our Suppliers adhere to this Supplier Code.

The principles outlined in this Supplier Code apply to the supplier selection process as well as throughout the duration of the business engagement, and in some instances, continue to apply after the business engagement has ended.

Apotex may monitor activities through on-site inspections, certifications and third-party assessments.



ETHICAL BUSINESS PRACTICES

ANTI-CORRUPTION LAW

Apotex does not tolerate any form of bribery, extortion or embezzlement in business or government relationships. Suppliers must not give or receive bribes or improper payments of any kind either directly or indirectly through a third party. Suppliers must comply with all anti-corruption laws, including those that prohibit the payment, promise, offer or authorization of money, gifts or other items of value to obtain or gain an unfair commercial advantage or otherwise violate applicable anti-corruption laws. Additionally, any interactions with Government Officials must strictly follow all applicable laws and regulations.

FINANCIAL AND BUSINESS RECORDS

Suppliers must maintain accurate financial records, conforming to generally acceptable accounting practices, including with respect to all invoices submitted to Apotex for payment or reimbursement. Suppliers shall maintain business records to demonstrate conformance to all applicable legal and regulatory requirements.

CONFLICTS OF INTEREST

Suppliers must prevent conflicts of interest with Apotex or any of its employees. Suppliers are prohibited from offering, giving, or promising any gift, entertainment, or benefit in order to gain an unfair advantage or that may influence, or appear to influence, the Apotex employee's objectivity in their business decisions. Suppliers must notify Apotex, in writing (see Speak Up section), should an Apotex employee have any other relationship with the Supplier which may represent a conflict (e.g., a family relation to a Supplier employee).

COMPETITION LAW

Suppliers must compete fairly and act in accordance with applicable competition law, including but not limited to Canada's *Competition Act* and the U.S. Anti-trust laws. Specifically, Suppliers are prohibited from making anti-competitive agreements such as price-fixing, market allocation, bid rigging or unlawfully limiting production capacities.

ETHICAL BUSINESS PRACTICES

PRIVACY AND CONFIDENTIALITY

Suppliers must adhere to the applicable privacy and data protection laws, protecting the individuals who are providing their personal data. At all times, Suppliers must make appropriate use of personal data (e.g., that of employees or customers) for legitimate and well-defined purposes, putting industry standard safeguards in place protecting such data from improper use, unauthorized access, disclosure or modification, theft or fraud.

Suppliers must protect and secure Apotex's intellectual property and other confidential information against unauthorized disclosure, release, access or misuse. Except as required by law, Suppliers must not disclose Apotex's confidential and sensitive information to any third party or use Apotex or any affiliates name or marks without prior written approval from Apotex.

TRADE AND ECONOMICS SANCTIONS

Suppliers must comply with applicable legislation authorizing the imposition of trade and economic sanctions.

PRODUCT QUALITY

Suppliers must not only comply with all applicable laws, regulations and quality standards, but also with Apotex's quality standards and commitment to providing safe, quality medicines to patients worldwide.



SOCIAL RESPONSIBILITY¹

MODERN SLAVERY AND HUMAN TRAFFICKING

Apotex has a zero-tolerance position on Modern Slavery and Human Trafficking. All employment must be freely chosen, and all labour must be voluntary, not subject to any form of exploitation or threats of denunciation.

Suppliers must not use any child labour or forced, bonded or prison labour. Suppliers must not employ any person younger than the applicable legal minimum age for working.

Suppliers must implement procedures to ensure they comply with the most stringent laws on slavery and human trafficking, regardless of location. Workers must be allowed to maintain control over their identity documents and must be free to leave their employer after a reasonable and lawful notice.

DISCRIMINATION AND EQUAL OPPORTUNITY

Human rights are rights inherent to all human beings, regardless of race, religion, national or ethnic origin, age, colour, gender, sexual orientation, marital status, citizenship status, disability, or any other statutes protected under applicable laws. Suppliers must act justly, fairly and equitably and prohibit any unfair treatment or discrimination on the basis of any protected grounds.

Terms and conditions of employment should be based on an individual's skills and ability to do the job, and not on personal characteristics or beliefs of those making the decision whether to hire an individual. Suppliers must abide by applicable non-discrimination and human rights legislation. Where laws do not prohibit discrimination or allow for differential treatment, we expect Suppliers to not discriminate in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national or ethnic origin, religion or creed, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

¹ See [ETI Code](#) for more information

SOCIAL RESPONSIBILITY

RESPECT AND DIGNITY

Suppliers must treat all employees with respect and dignity. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited.

FREEDOM OF ASSOCIATION

Suppliers must recognize and respect the legal right of workers to freely associate (or not associate) with any group, such as collective bargaining groups or unions, if such groups are legal in their own country. Suppliers must not discriminate against workers' representatives and must allow them to carry out their representative functions in the workplace.

WORKING HOURS AND COMPENSATION

Suppliers must fairly compensate their employees by paying wages and providing benefits that meet or exceed the applicable, legally mandated minimum requirements in the country in which the suppliers operate. Employees should be provided with a clear, written account of each pay period that reflects any wage deductions made in compliance with applicable laws.

Suppliers must maintain reasonable work hours for employees in compliance with any required standards or applicable local laws, whichever is the most stringent. Employees must be permitted to have reasonable days off and applicable leave of absence privileges.

HEALTH AND SAFETY

SAFE WORK ENVIRONMENT

Suppliers must be committed to providing a clean, safe and healthy work environment, operating in compliance with all applicable laws and regulations, and designed to prevent workplace accidents and injuries including instructing workers on health and safety issues. A hygienic work environment must be provided for workers including access to potable water, restrooms, clean areas for food storage, access to medical facilities, personal protective equipment and well-lit, adequate workstations.

In addition, suppliers will ensure safe storage of chemicals associated with pharmaceutical ingredients and manufacturing operations and robust fire safety and prevention programs, including but not limited to emergency plans with clear and accessible aisles and exits and which employees are made aware.



RESPECTING THE ENVIRONMENT

ENVIRONMENTAL LAWS

Suppliers of Apotex shall comply with all applicable environmental regulations and authorizations such as:

- Handling and disposing of materials or waste;
- Reducing waste and environmental emissions;
- Reducing hazardous chemicals in the supply chain;
- Training employees on how to handle hazardous materials;
- Obtaining and updating all required environmental permits and authorizations;
- Having mechanisms in place to both prevent and mitigate accidental spills and releases into the environment; and
- Complying with local reporting requirements.

WASTE AND EMISSIONS

In addition to complying with applicable laws and regulations, Apotex encourages Suppliers to identify and implement appropriate management plans for reducing, reusing and recycling waste, air emissions, and wastewater to reduce any potential adverse environmental impacts.

SUSTAINABLE MATERIALS

Suppliers must responsibly source materials and components, seeking sustainable options where possible or where required.

SYSTEMS AND SUPPLY CHAIN

MANAGEMENT SYSTEMS

Suppliers are expected to establish appropriate management systems and assign appropriate resources to demonstrate compliance with the Supplier Code. Suppliers must also cooperate with reasonable assessment processes as requested by Apotex, including applicable third-party due diligence processes, and audits.

CONTINUAL IMPROVEMENT

Suppliers are expected to continually improve on the aspects of the Supplier Code by setting objectives, and following through with implementation plans and corrective actions, whether as a result of internal or external audits, inspections and risk assessments or regular and ongoing monitoring of same.

TRAINING

Suppliers are expected to establish and implement a training plan so that their employees and contractors have the appropriate knowledge and skills to comply with the expectations of the Supplier Code.

SUPPLY CHAIN

Suppliers are expected to be transparent with information regarding their supply chain to support Apotex's compliance with quality and manufacturing standards, regulatory requirements, as well as our customer expectations.

SPEAK UP



Report any violation of the Code of Conduct or suspected compliance concerns.



www.APOspeaks.com



APOTEX

Global Business Ethics & Compliance

HOW DO I REPORT A CONCERN?

REPORTING ON BREACHES

Suppliers must report breaches of this Supplier Code to Apotex as soon as possible. Failure to do so will be a breach of this code. We strongly support a culture of Speaking Up for both suppliers and workers, without fear of retaliation.

CHANNELS FOR SPEAKING UP

Suppliers, their employees, workers or contractors may report actual or suspected breaches, or ask questions pertaining to this Supplier Code by phone or online, or as per applicable contractual terms. Reports may be submitted anonymously (where permitted by law). For more information click on [APOspeaks](#).