

ETHICS & COMPLIANCE STANDARDS FOR INSUD PHARMA'S SUPPLIERS

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It is critical that all Insud Pharma's suppliers share our commitment to business with integrity. These standards apply to individuals/organizations that provide services, raw material, active ingredients, components, finished goods, or other products ("Suppliers"). Where they exist, Supplier's own written ethics and compliance standards may replace these Standards if they meet Insud Pharma's expectations and are incorporated into a written agreement.

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LABOR

Child labor

The minimum working age is in compliance with existing country regulations and must never be less than 15 years old regardless of the type of activity. The minimum age of employment or labor which, due to its nature or to the conditions in which it is exercised, may jeopardize the health, safety or morality of adolescents must never be less than 18.

References:

Minimum age ILO convention (n°138)
Worst forms of child labor ILO convention (n°182)

Forced labor

The employee chooses his employer freely; forced labor in all its forms is prohibited. Employees may leave the employer freely provided they comply with advance notice specified by law. The retention of identity papers, passports, training certificates, work permits or any other document is prohibited. Work by prisoners is accepted on the sole condition that it is performed voluntarily and is paid.

References:

Forced labor ILO convention (n°29)
Abolition of forced labor ILO convention (n°105)

Abuse

Inhuman treatments, physical punishments, insults, harassment, mental or physical coercion are prohibited.

Work hours

Work hours are in compliance with country regulations. Generally speaking, the work time does not exceed 60 hours per week, with a minimum of one day of rest per week.

References:

Weekly rest ILO conventions (n°14/106)

Wages and fringe benefits

The minimum wage paid to employees as well as the fringe benefits are in conformity with country laws (including apprentices, trainees or employees during the trial period). While in compliance with country laws relating to the maximum authorized labor time, overtime work is paid at a higher rate than normal hours. The employee is duly notified of the method used to calculate wages. Wages are paid in cash, by check or by bank transfer, to the exclusion of any other form of compensation, except in the specific cases provided for by country regulations. Wages are paid at regular intervals and with reasonable frequency. Deductions from wages for disciplinary reasons are prohibited.

References:

Protection of wages ILO convention (n°95)
Minimum wage fixing ILO convention (n°131) and recommendation (n°135)

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Freedom to express oneself

Employees communicate freely with their superiors concerning their working conditions, compensation, etc. without fear of reprisals, intimidation or harassment. In compliance with country laws, employees are free to join any trade union of their choice.

References:

Freedom of association and protection of the right to organize ILO convention (n°87)
Right to organize and collective bargaining ILO convention (n°98).

Equal opportunities

Any discrimination in hiring, training, promotion, compensation, etc. based on race, color, age, sex, sexual orientation, marital status, ethnic group, handicap, religion, membership of a political party, membership of a trade union, etc. is prohibited.

References:

Equal remuneration ILO convention (n°100)
Discrimination (employment and occupation) ILO convention (n°111)
Diversity: Diversity of nationality, background, race, origin, gender, sexual orientation, political or religious



HEALTH & SAFETY

The Supplier provides a safe and healthy working environment for all employees working at their sites. The supplier develops a Health and Safety (HS) organization to define, implement and follow-up on an HS policy and HS Management System that includes compliance with local and national regulations. Among other things, the Health and Safety policy includes:

Workers' Health and safety protection

The supplier shall identify and protect workers from any physical, chemical and biological hazards in the workplace as well as from risks associated with any infrastructures used by their employees.

Hazard information and training

Safety information for any identified workplace risks shall be made available to inform and train workers to protect them from the risk. This includes safety information about hazardous substances used: chemicals, pharmaceuticals active ingredients, intermediate products, etc.

Facility operations and Maintenance

The supplier shall have programs in place to operate and maintain all its operations in the safest manner possible (manufacturing, utilities, etc.). For the most hazardous installations (i.e. chemical processes, some pharmaceutical operations etc.), the supplier shall conduct specific risk analyses in order to implement measures avoiding any catastrophic event, such as chemical releases and/or explosions, which could cause damage inside and/or outside the site.

Emergency Preparedness and Response

The supplier shall identify and assess possible emergency situations in the workplace and minimize their impact inside and/or outside the site by implementing emergency response plans and procedures.



ENVIRONMENT

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The supplier ensures programs are in place at all their sites in order to minimize environmental impact of their activities. The supplier uses his best efforts to reduce and even eliminate emission sources generated by his activities, to preserve natural resources (water, and non-renewable resources), avoid or minimize the use of hazardous substances and when possible to promote waste recycling or re-use.

Compliance with legal and regulatory requirements

The supplier ensures compliance with all country regulations and recommendations relating to environmental protection in force within the countries where it carries out its activities. The supplier has the appropriate certificates and/or permits allowing it to operate. Environmental reports are prepared in accordance with country regulations. They are available at the sites.

Effluents and emissions

The effluents and industrial wastewater are measured, tested and treated before release into the natural environment. The hazardous substance emissions into the atmosphere are measured, tested and treated before they are released.

Waste

Waste is re-used or recycled everywhere where it's possible. The supplier ensures that waste, particularly hazardous waste, is managed at the site level: handling, storage, recycling, etc. The supplier ensures that all wastewater effluent is discharged at authorized treatment plants. The traceability of their disposal is assured.

Pollution Prevention

The supplier makes sure that all the substances presenting an environmental risk are identified, labelled and stored in order to prevent any risk of pollution in the event of accidental emission or discharge. An emergency preparedness personnel and procedures are in place to treat any accidental event presenting an environmental risk to site property or ground water.

Resources management

The supplier does his best to reduce energy and water consumption as well as non-renewable natural resources.

Climate change

The supplier measures its greenhouse gases emissions and pledges to voluntarily reduce them.



ETHICS

The supplier is committed to working against all forms of corruption, including extortion and bribery. The supplier must refrain from proposing to a Insud Pharma employee any sum of money, gifts, loans, rebates, valuable objects, with the exception of presents or promotional gifts of reasonable value which are in compliance with all applicable laws, rules, and regulations.

Adherence to applicable laws & Regulations

Suppliers must comply with applicable laws, rules, regulations, and Insud Pharma's ethical standards.

Business Integrity

Suppliers are expected not to practice or tolerate any form of corruption, extortion or embezzlement. Suppliers will not offer or accept bribes or other unlawful incentives to/from their business partners. Suppliers are expected not to offer to its customers employee's gifts or any other kind of personal benefit resulting from the relationships with the suppliers.

Fair competition and Antitrust

Suppliers must comply with all applicable laws and regulation regarding fair competition and antitrust.

Data Privacy

Supplier must abide by applicable data privacy laws and regulations when handling personal information.

Animal Welfare

If applicable to the suppliers' industry, animal testing will be minimized and alternatives will be used whenever possible, scientifically valid and acceptable to regulators.

Identification of Concerns

Suppliers will provide means for their employees to report concerns or potentially unlawful activities in the workplace. Any report should be treated in a confidential manner. Suppliers will investigate such reports and take corrective action if needed.

Intellectual Property

Suppliers will safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected.

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Gifts & Entertainment

Gifts and entertainment are not needed in order to conduct business with Insud Pharma and are highly discouraged.

Conflict of Interest

Vendors should avoid any interaction with any Insud Pharma employee that might conflict, or appear to conflict, with that employee acting in the best interests of Insud Pharma. For example, partners should not employ or otherwise make payments to any Insud Pharma employee during the course of any transaction between the business partner and Insud Pharma, other than pursuant to the Insud Pharma contract. If a business partner employee is a family relation to any Insud Pharma employee or if a vendor has any other relationship with a Insud Pharma employee that might represent a conflict of interest, the business partner should disclose this fact to Insud Pharma.



INSUD PHARMA RESOURCES

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Additional information can be found at:

www.insudpharma.com

References

- Declaration of Helsinki
<http://www.wma.net/en/20activities/10ethics/10helsinki/>
- International Labor Standards (ILO)
<http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm.ilo.org>
- OECD Guidelines for Multinational Enterprises
<http://www.oecd.org>
- OECD Guiding Principles for Chemical Accident, Prevention, Preparedness and Response
<http://www.oecd.org/env/ehs/chemical-accidents/Guiding-principles-chemical-accident.pdf>
- Pharmaceutical Supply Chain Initiative
<http://www.pharmaceuticalsupplychain.org>
- Responsible Care Global Charter
<http://www.responsiblecare.org>
- Together for Sustainability
<http://www.tfs-initiative.com>
- United Nations Global Compact
<http://www.unglobalcompact.org>
- Universal Declaration on Human Rights
<http://www.un.org/Overview/rights.html>



**ACCEPTANCE BY SUPPLIER OF ETHICS & COMPLIANCE
STANDARDS FOR INSUD PHARMA'S SUPPLIERS**

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Supplier information:

Corporate name:

Legal representative:

Full name:

Corporate position:

Date:

Full signature:

