

Supplier Code of Conduct



Scope

At ARLANXEO (“ARLANXEO”), how we conduct ourselves is just as important as the results that we achieve. ARLANXEO’s Supplier Code of Conduct (the “Supplier Code”) outlines our expectations of the work practices of our vendors, suppliers and contractors (“Suppliers”). Consistent with all our policies and procedures, including our Employee Code of Conduct, we expect Suppliers to adhere to the Supplier Code. Suppliers must assist ARLANXEO in enforcing the Supplier Code by communicating its principles and requirements to their employees and business partners.

Compliance with Laws and Business Ethics

Suppliers must comply with all applicable laws and regulations pertinent to the delivery of goods and services being provided. Suppliers should be committed to the highest standards of ethical conduct when dealing with ARLANXEO and its employees, as well as other Suppliers and customers. Suppliers should conduct all their activities professionally. Suppliers should act in good faith with respect to any recommendations that they give to ARLANXEO, so that issues are never influenced by anything other than the best and proper interests of ARLANXEO.

Health, Safety, Security and Environment

Suppliers should have a systematic approach to create a healthy, safe, secure and sustainable environment (“HSSE”), designed to ensure compliance with all applicable domestic and foreign laws and regulations and to achieve continuous performance improvement.

Suppliers must:

- Conduct business in a way that supports the goal of no accidents or harm to people
- Require their workforce and business partners to report any incident, injury, illness or unsafe condition immediately and to stop work that could be unsafe, so that appropriate action could be taken
- Be committed to protecting the environment in compliance with all applicable environmental laws and regulations
- Use energy and natural resources efficiently
- Look for ways to minimize waste, emissions and discharge of their operations, products and services
- Take measures to ensure the security of their people and assets as well as the overall security of those operating onsite

Bribery, Money-Laundering and Fraud

Bribery is strictly against ARLANXEO policy, even if the refusal to make such a payment would result in the loss of a business opportunity. Suppliers should comply with and have in place processes and procedures to proactively ensure compliance with the applicable international anti-corruption laws.

Suppliers should prevent and have in place processes and procedures to proactively prevent money-laundering, including the act of hiding illegal funds (especially those with possible links to terrorism or criminal activity) or giving such funds apparent legitimacy. Suppliers should maintain internal programs to detect and address the potential for fraud occurring within its operations.

Conflict of Interest

ARLANXEO expects its commercial third parties to identify and avoid situations where an actual, potential, or perceived conflict of interest may exist and disclose it to ARLANXEO immediately. These situations can be ones where the interests of a third party / employees may, in reality or through perception, compete with the interests of ARLANXEO, which may either impair the distributor's ability to perform its responsibilities or create an appearance of impropriety. In addition, as per ARLANXEO policy, ARLANXEO employees are discouraged from accepting gifts and hospitality from third parties that may influence or be perceived to influence decision making.

Employment Practices

Suppliers should conduct all their operations in a socially responsible, non-discriminatory manner and in full compliance with all applicable employment and labor laws and regulations.

Suppliers also should respect the human rights of workers and treat them with dignity and respect as understood by the international community. Suppliers may not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse, or unreasonable restrictions on entering or exiting company-provided facilities. Suppliers may not traffic in persons or use any form of slave, forced, bonded, indentured, or prison labor. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. All work must be voluntary, and workers shall be free to leave work or terminate their employment with reasonable notice.

Suppliers may not use child labor in their operations consistent with ILO's (International Labor Organization) core labor standards and the United Nations Global Compact principles.

Suppliers also should provide a workplace that:

- Is free from discrimination based on race, ethnicity, religion, national origin, disability, age, sexual orientation, gender or marital status, or any status that is a protected category under applicable laws.
- Has effective mechanisms to allow workers to speak up or raise grievances without fear of retaliation.
- Respects individual choices on trade union or work council membership within the appropriate national legal framework.

Intellectual Property and Confidentiality of Information

ARLANXEO retains the ownership of all intellectual property that ARLANXEO owns or creates at any time. In return we respect our Suppliers' intellectual property. Suppliers must respect and not infringe ARLANXEO's intellectual property rights and safeguard ARLANXEO customer information. Furthermore suppliers must also respect and not infringe at any time while being a supplier to ARLANXEO intellectual property rights of third parties.

Transfer of technology and know-how must be done in a manner that protects intellectual property rights and customer information.



Suppliers may only use ARLANXEO information and property (including tools, drawings and specifications) for the purpose and limited time for which they are expressly provided to the Supplier and for no other purposes.

Suppliers have to take appropriate steps to safeguard and maintain of the confidentiality of ARLANXEO proprietary information, including maintaining it in confidence and in secure work areas and not disclosing it to third parties (including other customers, subcontractors, etc.) without the express prior written permission of ARLANXEO.

Data Protection

Supplier shall treat the personal data received from ARLANXEO in accordance with the principles and requirements of the General Data Protection Regulation (2016/679/EU) and any other applicable laws and/or regulations.

This means that, among other things, Supplier shall not transfer, modify or amend the data received from ARLANXEO, nor use it for any other purpose than for the purpose it has been disclosed. Furthermore, Supplier shall treat the personal data confidential, limit access only to those persons who need access to the data, and shall not store or save the personal data any longer than necessary.

Reporting

Suppliers that have any Compliance related concerns are encouraged to contact the ARLANXEO hotline at:

arlanxeo.ethicspoint.com

Notifications can be made anonymously 24 hours' day, seven days a week.

Contact

Suppliers should contact ARLANXEO's Compliance Department at compliance@arlanxeo.com with any questions about the Supplier Code.