



# Partner Code of Conduct

# A privilege and a responsibility



## Introduction

At Alliance we pride ourselves on delivering clinically valuable healthcare products to consumers and patients around the world. We see this as both a privilege and a responsibility and in recognition of this, we strive to maintain the highest standards of professional and ethical conduct. We recognise that our partners are an integral part of our business – a partnership which we value and rely upon, and with whom we expect to recognise and share the same values and standards.

Our culture is founded on our core PRAISE Values: Performance, Realism, Accountability, Integrity, Skill and Entrepreneurship and these values inform both how we operate as a Group and how we engage with the outside world. At the heart of our Partner Code of Conduct (“Code of Conduct”) is the belief that Alliance and its partners should not only comply with laws and regulations, but that our collective actions should reflect good corporate citizenship.

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**Peter Butterfield**  
Chief Executive Officer

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# Setting the standard



## Partners are expected to adopt this Code of Conduct or develop their own proportionally equivalent policies.

This Code of Conduct sets out the global standards expected of our partners in the conduct of their business, assists us with evaluating and selecting our partners and supports our partners in understanding and upholding our expectations.

For the purposes of this Code of Conduct, the term “Partner(s)” includes all external contracting parties providing goods and/or services to Alliance and includes our distributors.

Our partners are expected to adopt this Code of Conduct or develop their own proportionally equivalent policies or guidelines that address the ethical business standards set out below.

### Alliance expects all partners to:

- › Understand and comply with this Code of Conduct or their own equivalent policies or guidelines and maintain documentation to demonstrate such conformance.
- › Operate in compliance with all applicable laws, regulations, guidelines and industry codes.
- › Conduct their business ethically and with integrity.

- › Support and respect human and labour rights.
- › Promote health and safety in the workplace.
- › Operate in a sustainable and environmentally responsible manner.
- › Immediately report to Alliance any gaps in compliance with this Code of Conduct.
- › Allow Alliance or an authorised delegate to conduct necessary audits related to the content of this Code of Conduct.
- › Communicate these requirements to their own partners and monitor compliance as far as is practical.

Alliance is aware that differences in cultures and laws create challenges in applying this Code of Conduct globally. This Code of Conduct sets out the ethical goals of Alliance, however partners must recognise that applicable law is not replaced by this Code of Conduct and partners are expected to always operate in compliance with all applicable laws, rules and regulations.

# Doing the right thing



## Partners shall conduct their business ethically and with integrity.

### **Business Integrity**

Alliance operates a zero-tolerance policy to all extortion, bribery, corruption, money laundering and embezzlement and partners are expected to comply with all relevant anti-corruption laws and regulations. Partners shall not offer, pay, solicit or accept bribes in any form or participate in any other illegal inducements. Partners shall implement robust fraud prevention systems and shall prepare and maintain financial records for all matters related to their business with Alliance. Partners will comply with our Anti-Bribery and Corruption Policy, found here (or develop their own proportionally equivalent policy): [Anti-Bribery and Corruption Policy](#).

### **Fair Competition**

Partners must abide by all applicable global competition and anti-trust laws and regulations and adopt fair business practices, including accurate and truthful advertising.

### **Trade Compliance**

Partners must comply with all applicable import and export controls, regulations and sanctions.

### **Identification of Concerns**

Partners shall encourage workers to report concerns in the workplace without threat of reprisal or intimidation.

### **Privacy and Confidentiality**

Partners shall comply with all applicable data protection laws and shall at all times protect the personal data of customers, employees and partners against accidental, unauthorised or unlawful loss, destruction, alteration, disclosure, use or access. Partners shall protect Alliance's confidential information and shall ensure that they have appropriate safeguards in place to protect personal data and confidential information.

### **Clinical Trials**

When engaging clinical trials, Partners shall ensure that they are conducted in accordance with the global standards of Good Clinical Practices, applicable law and such engagement shall follow the principles set out in this Code of Conduct. Partners must have the upmost regard for the health and safety of all participants.

### **Conflict of Interest**

Partners must avoid conflicts of interest with their business partners and Alliance. If a partner becomes aware of a conflict of interest with Alliance, the partner will disclose this to Alliance.

### **Business Controls**

Partners shall maintain effective business controls and accurate reporting and maintain accurate and complete records in compliance with international accounting standards.

# Being ethical and inclusive



## Partners shall always support and respect human and labour rights.

### Freely Chosen Employment and Child Labour

Partners shall not use child, compulsory, forced or bonded labour or any other form of slavery or servitude and must work diligently to ensure that their supply chain does not use such practices. Workers under the age of 18 shall only be employed for non-hazardous work and then only where the requirements set out under the International Labour Organization Convention 138 Concerning Minimum Age have been complied with by applicable member state including ensuring that the relevant person is either (i) above the legal age for employment, or (ii) above the age established for completing compulsory education, in the applicable territory.

### Non-Discrimination and Fair Treatment

Partners shall treat others fairly and with respect and without discrimination for reasons such as race, gender, nationality, religion, sexual orientation, disability or age. Partners shall ensure that their workplace is free from any form of harsh and inhumane treatment.

### Modern Slavery

Modern slavery is incompatible with our ethical principles, and we expect all our partners to work to prevent any form of modern slavery in their workplace and in their own supply chains and comply with our Anti-Slavery Policy, found here (or develop their own proportionately equivalent policy): [Anti-Slavery Policy](#).

### Freedom of Association

Partners shall uphold the rights of workers, as set forth in local laws and uphold freedom of association and the effective recognition of the right to collective bargaining, free from interference, discrimination, retaliation or harassment.

### Wages, Benefits and Working Hours

Partners shall pay workers in a timely manner and in accordance with applicable wage laws. Working hours must be in accordance with applicable laws.

# Ensuring a safe workplace



Partners shall promote health and safety in the workplace.

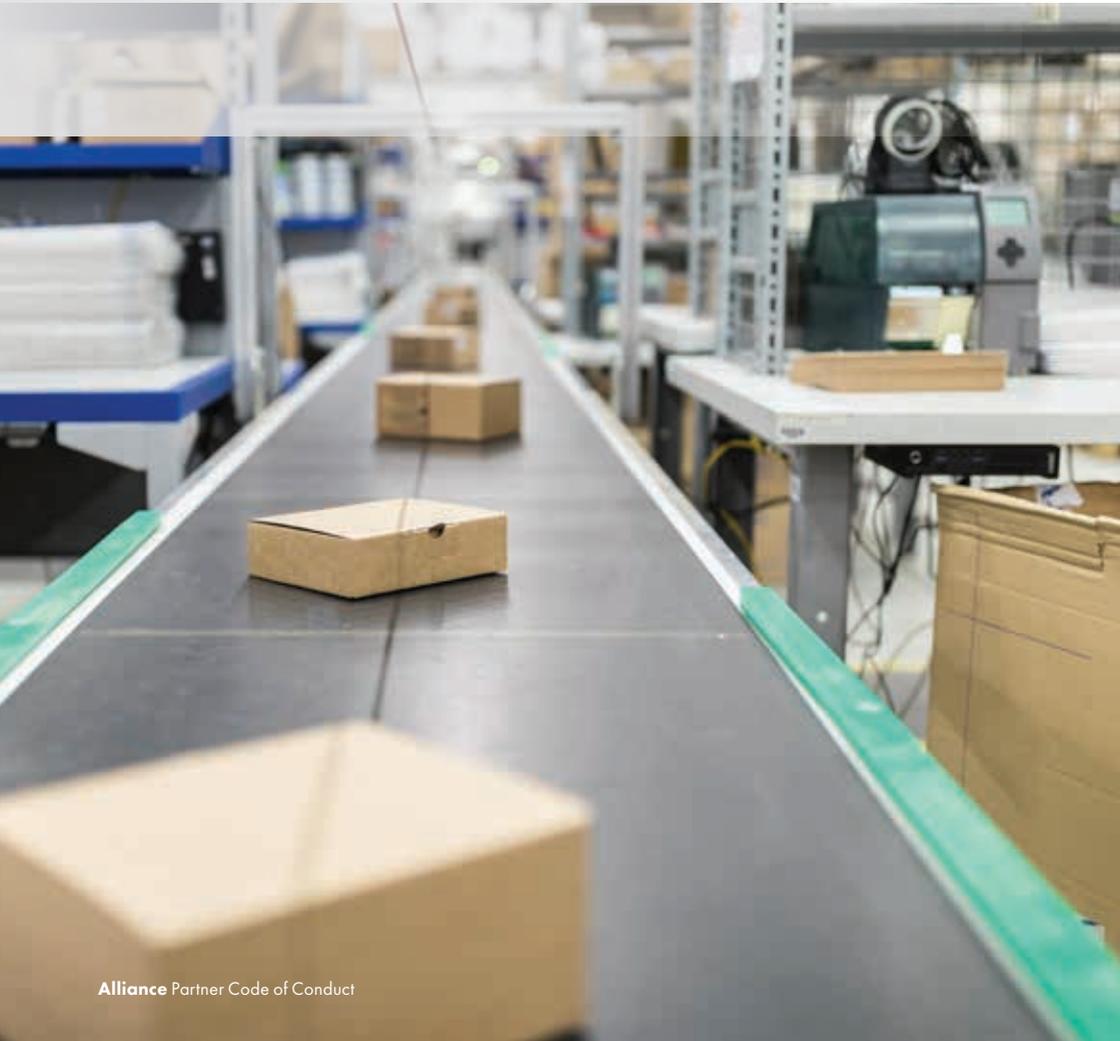
## **Emergency Preparedness and Process Safety**

Partners shall periodically carry out appropriate risk assessments in the workplace and shall mitigate risks identified and implement appropriate emergency response plans. Partners shall implement programmes to prevent or mitigate against catastrophic events, including releases of chemicals.

## **Worker Protection and Hazard Information**

Partners shall implement programmes to protect workers and prevent or control employee exposure to workplace hazards including chemical, biological, and physical hazards and physically demanding tasks. To protect workers from hazards, safety information and training shall be provided to workers. All programmes and training shall be periodically evaluated and where necessary updated to ensure they remain appropriate.

# Acting responsibly



## Partners shall operate in a sustainable and environmentally responsible manner.

### Environmental laws and regulations

Partners will have a good awareness of and maintain robust processes and procedures to ensure compliance with all applicable environmental laws, regulations and codes of practice. All required environmental permits, licences and registrations shall be obtained, maintained and complied with.

### Waste, Emissions, Spills and Releases

Partners shall ensure that they have systems in place to manage waste and emissions and wastewater discharges in a safe manner.

Partners shall work to prevent and mitigate against spills and releases into the environment.

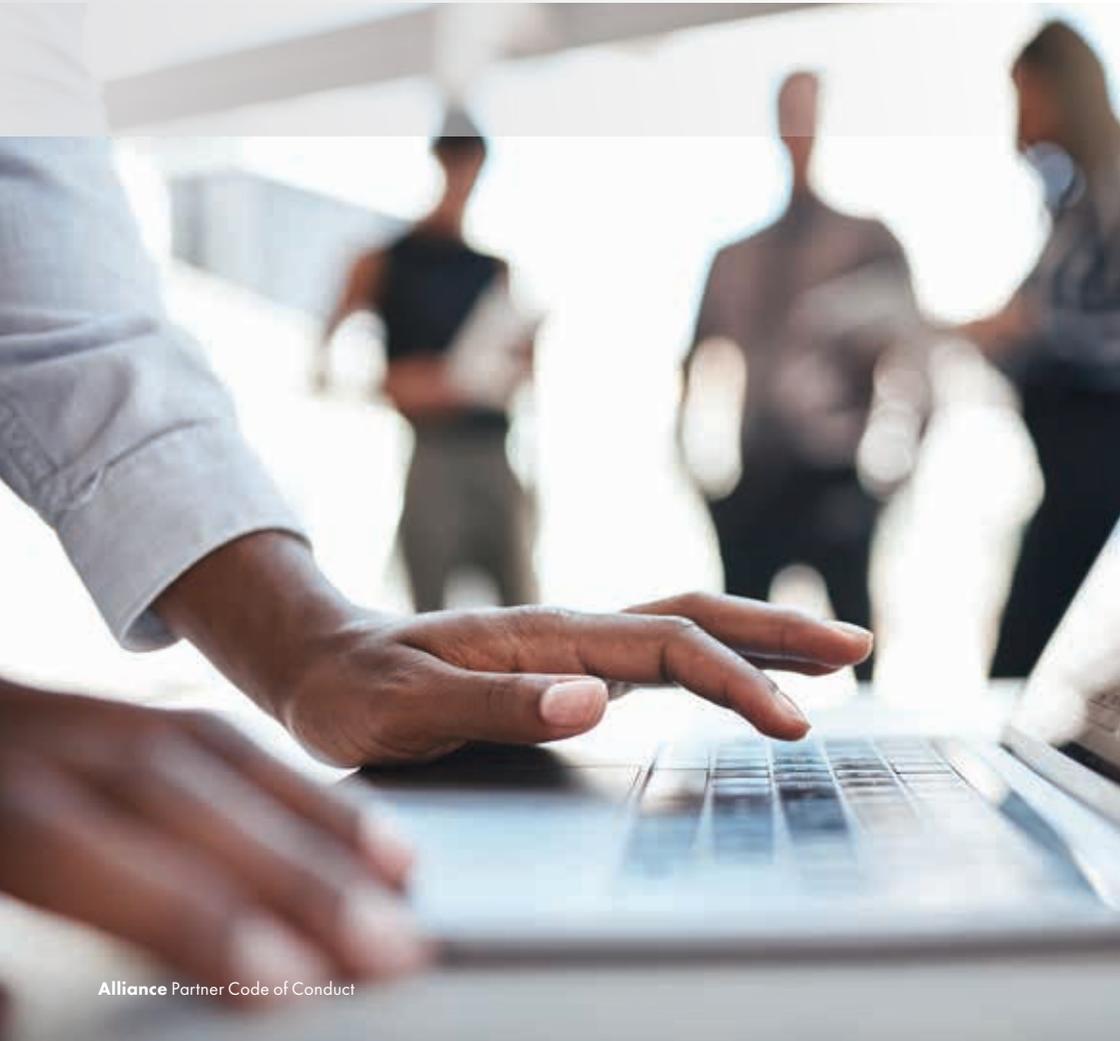
### Resources and De-Carbonization

Partners shall work to improve their efficiency and reduce consumption of natural resources and minimise CO<sub>2</sub> emissions.

### ESG disclosure

Partners shall make reasonable efforts towards transparency and disclosure of ESG related data and shall endeavour to share such information with Alliance.

# Complying with the code of conduct



Partners shall have processes in place to facilitate continuous improvement, business continuity and compliance with this Code of Conduct.

## **Risk Management and Business Continuity**

Partners shall have systems in place to determine and control the risks identified in this Code of Conduct, including business continuity risk management plans and operational continuity plans.

## **Training**

Partners shall provide training to management and workers to ensure awareness of this Code of Conduct and applicable laws, regulations, and recognised standards.

## **Continuous Improvement**

Partners are expected to demonstrate continuous improvements, set performance objectives, and take necessary corrective actions for any deficiencies identified by internal or external inspections and assessments.

## **Reporting concerns to Alliance**

We encourage a culture of openness and accountability at Alliance and encourage our employees and partners to report any concerns they have, including concerns regarding violations of the Code of Conduct, to Alliance in line with our Speak Up Policy, found here: [Speak Up Policy](#). Partners can get in touch by:

- › talking to their usual point of contact at Alliance, or
- › contacting Safecall who are an external reporting tool, independent of Alliance, using the below Safecall links:

Telephone number lists:

[www.safecall.co.uk/freephone](http://www.safecall.co.uk/freephone)

File a report online:

[www.safecall.co.uk/report](http://www.safecall.co.uk/report)