

Title: <b>Supplier Code of Conduct</b>			
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## INTRODUCTION TO THE SUPPLIER CODE OF CONDUCT

Orexo's ambition is to be recognized for the added value our products bring to our patients and we want to be a trusted partner for the way we work and operate delivering benefits for patients, society, shareholders and other stakeholders.

In the effort to fulfil these ambitions, Orexo support the UN Global Compact and embrace the Ten Principles on Human Rights, Labour, Environment and Anti-corruption.

This Supplier Code of Conduct sets out Orexo's ethical business expectations of our suppliers and business partners providing goods or services in areas of specific relevance to our business operation and interactions with third parties.

## APPLICATION OF THE CODE

The expectations in this Suppliers Code of Conduct apply to Orexo's suppliers and business partners, including the supplier's or business partner's sub-contractors, temporary staff and consultants (hereafter collectively referred to as a supplier) of goods or services for Orexo.

However, Orexo strongly encourage our suppliers and other business partners to expand their ethical business efforts, as described in this code, into the business processes and decisions in the supplier's upstream supply chain management and procurement activities.

- Orexo is committed to implement these Principles and strongly encourages our supply partners to adhere to them.
- Orexo believes that society and business are best served by responsible business behaviors and practices. Fundamental to this belief is the understanding that a business must, at a minimum, operate in full compliance with all applicable laws, rules and regulations.
- Orexo is aware of differences in culture and the challenges associated with interpreting and applying these Principles globally. While Orexo believe that what is expected is universal, it is understood that the methods for meeting these expectations may be different and must be consistent with the laws, values and cultural expectations of the different societies of the world.
- Orexo believes the Principles are best implemented through a continual improvement approach that advances supplier performance over time.

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## ETHICS

Suppliers shall conduct their business in an ethical manner and act with integrity.

### Business Integrity and Fair Competition

All corruption, extortion and embezzlement are prohibited. Suppliers shall not pay or accept bribes or participate in other illegal inducements in business or government relationships. Suppliers shall conduct their business consistent with fair and vigorous competition and in compliance with all applicable anti-trust laws. Suppliers shall employ fair business practices including accurate and truthful advertising.

### Identification of Concerns

All employees should be encouraged to report concerns or illegal activities in the workplace without threat of reprisal, intimidation or harassment. Suppliers shall investigate and take corrective action if needed.

### Research and Development

Research and development activities shall adopting high quality science and delivered consistent with all applicable laws and regulations, the Declaration of Helsinki, and recognised international standards to the proposed work in all countries in which they are conducted, keeping the safety and wellbeing of the patients and public health in mind.

Animal testing should only be performed after consideration to replace animals, to reduce the numbers of animals used, or to refine procedures to minimize distress. Alternatives should be used wherever these are scientifically valid and acceptable to regulators.

### Information and Data Privacy

Suppliers shall protect and properly use confidential information and personal data to ensure that company, employees, and patient privacy rights are protected.

Suppliers recognizes Orexo's commitment to work only with suppliers who operate its business in compliance with all applicable laws and regulations for the protection of personal data and individual's right to privacy, including the General Data Protection Regulation of the European Union (GDPR) and the Health Insurance Portability and Accountability Act (HIPAA) in the United States.

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2019-10-24**LABOR**

Suppliers shall be committed to uphold the human rights of employees and to treat them with dignity and respect and adhere to the Labor principles in the UN Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

Suppliers are expected to at least uphold the freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labour, the effective abolition of child labor and the elimination of discrimination in respect of employment and occupation. Suppliers shall pay employees according to applicable wage laws, including minimum wages, overtime hours and mandated benefits and communicate with the employees the basis on which they are being compensated in a timely manner.

**HEALTH AND SAFETY**

Suppliers shall provide a safe and healthy working environment, including for any company provided living quarters.

**Employee Protection**

Suppliers shall protect employees from over exposure to chemical, biological, physical hazards and physically demanding tasks in the work place and in any company provided living quarters.

**Process Safety**

Suppliers shall have programs in place to prevent or mitigate harmful or catastrophic releases of chemicals.

**Emergency Preparedness and Response**

Suppliers shall identify and assess emergency situations in the workplace and any company provided living quarters, and to minimize their impact by implementing emergency plans and response procedures.

**Hazard Information**

Safety information relating to hazardous materials and equipment - including pharmaceutical compounds and pharmaceutical intermediate materials - shall be available to educate, train, and protect employees from hazards.

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## ENVIRONMENT

Suppliers shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment. Suppliers are encouraged to support a precautionary approach to environmental challenges, conserve natural resources, to avoid the use of hazardous materials where possible and to engage in activities that reuse, recycle and save energy.

### Environmental Authorizations

Suppliers shall comply with all applicable environmental regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained and their operational and reporting requirements followed.

### Waste and Emissions

Suppliers shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions with the potential to adversely impact public health and environment shall be appropriately managed, controlled and treated prior to release into the environment.

### Spills and Releases

Suppliers shall have systems in place to prevent and mitigate accidental spills and releases to the environment.

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2019-10-24**PRODUCT SECURITY AND SUPPLY CHAIN INTEGRITY**

Suppliers are expected to tackle the threat of counterfeit and illegally traded medicines, as it applies to their business operation, and shall not be involved in any activity related to counterfeit or illegally traded medicines. Counterfeit medicines are those that are deliberately and fraudulently mislabeled with respect to identity and/or source. Illegally traded medicines include illegally diverted, fraudulently traded, tampered with and/or stolen medicines.

**Supply Chain Integrity**

Suppliers shall have systems in place and take the necessary steps to ensure the integrity, security and authenticity of the medicines through the end to end supply chain and to prevent illegally traded medicines.

**Traceability, Diversion Prevention and Prevention of Counterfeit Medicines**

Suppliers shall establish procedures and records to ensure traceability of medicines, and its active ingredients, as well as any waste, surplus, returned or discarded medicines, and its active ingredients, and including printed packaging materials and decommissioned machinery that introduces threats with respect to counterfeit and illegally traded medicines.

**Identification of Concerns and Response**

Suppliers shall inform Orexo in a timely manner in the event of any incident related to illegally traded or counterfeit medicines. Suppliers are expected to provide support in any subsequent investigation of such events or incidents.

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## MANAGEMENT SYSTEMS

Suppliers shall use management systems to facilitate continual improvement and compliance with the expectations of these principles.

### **Commitment and Accountability**

Suppliers shall demonstrate commitment to the concepts described in this document by allocating appropriate resources, authorities and responsibilities.

### **Legal and Customer Requirements**

Suppliers shall identify and comply with applicable laws, regulations, standards and relevant customer requirements.

### **Risk Management**

Suppliers shall have mechanisms to determine and manage risks in all areas addressed by this document.

### **Documentation**

Suppliers shall maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable regulations.

### **Training and Competency**

Suppliers shall have a training program that achieves an appropriate level of knowledge, skills and abilities in management and employees to address these expectations.

### **Continual Improvement**

Suppliers are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and management reviews.