



# Supplier Code of Conduct

## for the Rottendorf Group

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[www.rottendorf.com](http://www.rottendorf.com)





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## Foreword

**Rottendorf Pharma GmbH** and the companies affiliated with it within the meaning of Sec. 15 et seq. of the German Stock Corporation Act (AktG) (collectively "Rottendorf") together make up one of the leading contract development and manufacturing organizations (CDMOs) in the pharmaceutical industry. Rottendorf has worked for more than 95 years in production, packaging, and development of formulations and analytical methods for solid oral dosage forms for the international pharmaceutical industry.

Rottendorf actively works to promote sustainability and responsible conduct. Rottendorf is aware of its responsibility within its own organization and toward customers, suppliers, the environment, and society as a whole. Rottendorf is guided in particular by the values of integrity and fairness, regardless of whether its activities take place in Germany or other countries. With this in mind, Rottendorf supports initiatives and principles such as the UN Global Compact and commits to embrace these as an integral part of its corporate principles and procedures.





Rottendorf aims to work with its suppliers (“business partners”) in a spirit of partnership in order to not only receive the goods and services it requires, but also to satisfy its legal obligations and improve its sustainability performance along the supply chain.

This code of conduct sets out Rottendorf’s requirements with regard to responsible business practices, human rights and labor standards, environmental protection and product safety. Rottendorf takes responsibility for implementing ethical, social, and environmental standards within its own organization and expects suppliers to abide by the principles of this code of conduct and observe them accordingly in their own supply chains.





## **I. Expectations for business partners/ suppliers**

Business partners must be guided by applicable national laws and the relevant internationally recognized standards, guidelines, directives, and principles in all their business actions and decisions. In particular, the principles of the United Nations Global Compact, the Universal Declaration of Human Rights, the conventions adopted by the organizations of the United Nations, the core labor standards of the International Labour Organization (ILO), the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights must be observed.

Compliance with this code of conduct and the applicable norms and standards must not be undermined through side agreements such as deviating contractual agreements or other comparable measures. Should there be any discrepancy between national and international laws and regulations, the business partner is required to abide by the standard that affords greater protection for the affected parties.

Our business partners must not make any attempt to circumvent the obligations arising from this code. Although certain contracts and agreements, such as contracts to produce a work, subcontracting arrangements, remote work agreements, apprenticeship programs, and the use of fixed-term employment agreements may be permissible in certain cases, they must never serve to circumvent the provisions of this code.





By consenting to this code, our business partners declare that they are willing to comply with the provisions set down herein and with the international agreements, conventions, and treaties. Business partners are aware that they are required to operate in accordance with the provisions of this code in order to be and remain suppliers to our company.

Furthermore, our business partners agree not to participate in any actions whatsoever that constitute evident and severe international human rights violations. This applies even if these actions are not expressly prohibited in this code. In particular, our suppliers must not engage in any activities or commit any omissions that may have a particularly severe adverse effect on a legally protected legal interest and are obviously unlawful when the full circumstances involved are assessed objectively.

## **II. Our value system**

Our customers are our top priority. They lie at the heart of everything we do. We always strive to offer our customers added value, meet their needs, and enhance their satisfaction. We actively listen to our customers to understand their needs and arrive at solutions that exceed their expectations. Our success is based on our customers' satisfaction and success, since ultimately, both lives and quality of life depend on our work.

At Rottendorf, we strive for the utmost quality in everything we do, and we make every effort to perform our tasks on time and reliably. We firmly believe that the very highest quality is the foundation of our work, and thus a fundamental aspect of our relationships with customers and partners. We continuously invest in improving our processes and procedures to ensure consistent quality in our products and services. This is the only way we can ensure that we are always able to meet our obligations toward our customers and business partners.





We cultivate a culture of entrepreneurship. To that end, we encourage our employees to engage in continuous learning and develop new ideas to forge ahead with innovations and improvements. Ongoing further education and creativity keep us at the forefront of the pharmaceutical industry, so we can ensure that our customers receive an optimum supply. Each and every employee is an integral element of our business ecosystem, and all of us are called upon to use our full scope of action to identify opportunities and forge new paths.

At Rottendorf, we greatly value a culture of belonging, in which each and every employee feels that they are part of a team. We treat everyone with respect and appreciation and support clear, effective communication. We recognize and value each individual's contributions and foster an atmosphere that supports open dialogue and sharing of knowledge. These values are the bedrock of our corporate culture, and they help to ensure that we are successful together.

We are committed to ensuring that our employees can take responsibility, make targeted decisions, and reach their objectives. We empower them to cultivate this sense of responsibility, devise innovative solutions, and then make bold decisions. Beyond that, we set clear and measurable goals and encourage our employees to pursue and reach those targets with determination and a sense of purpose. This dedication to responsibility, empowerment, and focus on goals is a key component of our corporate culture and a crucial part of our success.

We are aware of both our responsibility toward society and the environment and our ethical duties. We recognize the impacts of our actions on society and strive to make a positive contribution. Our commitment to integrity is reflected in our active support for ethical standards, transparency, and honesty in our business dealings. Our employees are proud to be a part of this organization, which is founded on integrity and social responsibility, and are committed to embracing these values in everything they do each and every day.





### III. Respecting and safeguarding human rights

We are firmly committed to protecting and observing human rights. This commitment is an integral element of our corporate values, and it influences our actions in every area where we do business. We expect every one of our business partners to observe high ethical standards, along with complying with all relevant national and international laws.

#### 1. Discrimination and harassment

We require all business partners to treat their employees with dignity and respect. Sanctions, fines, other penalties, and disciplinary actions must be imposed only in strict compliance with the applicable national and international laws and standards and with globally recognized human rights.

Our business partners are required to ensure that adequate precautions are taken so that employees do not face any physical mistreatment or discipline or threats thereof, inhumane or degrading treatment, abuse, sexual or other harassment, verbal abuse, psychological or physical coercion and/or insults or other forms of intimidation in the workplace. We expect all our business partners to incorporate equal treatment for all employees as a core principle of their corporate policies. This relates to all aspects, including hiring, compensation, performance, promotion, and termination of employment.

As a result, business partners are obligated to eliminate and prevent any and all forms of discrimination based on factors including but not limited to national and ethnic origin, social status, health status, membership in a trade union or body representing employees, disability, sexual identity or orientation or other personal characteristics or preferences, skin color, age, sex or gender, ideology or world view, political orientation and/or activity, religion or beliefs.





Business partners are expected to actively work toward equality of opportunity in employment and to ensure full and complete compliance with the relevant applicable laws. This includes but is not limited to hiring, pay, promotions, and performance, along with dismissal and retirement for reasons other than those associated with the requirements of the job.

## **2. Employment**

All business partners must ensure that work is done on the basis of a recognized employment relationship that has been established in accordance with national laws and practices. Obligations arising from a regular employment relationship must not be circumvented through the use of other kinds of contracts or agreements.

## **3. Data protection and privacy**

Our business partners are obligated to abide by the applicable data and privacy laws. This means in particular that personal data of our employees and customers that a business partner receives from us or of which the business partner becomes aware in the context of our business relationship must not be collected, processed, or used except where necessary for stipulated and lawful purposes. All business partners commit to comply with all laws governing the sharing and reporting of personal data, withdrawal of consent to the use thereof, and blocking or erasure of personal data.

Beyond that, all business partners must respect individual privacy in a manner that is compatible with the right to privacy and must ensure that no one's privacy is violated unlawfully or arbitrarily.





## IV. Fair labor conditions and working conditions

### 1. Health and safety in the workplace

Preventing workplace accidents and occupational illness is a key goal for our organization. Ensuring the well-being and satisfaction of our employees is critically important to our company's success.

With this in mind, we expect our business partners to ensure a safe, healthy, and hygienic work environment and to take every necessary action to prevent all forms of work-related accidents and health impacts. Each of our business partners pledges, at a minimum, to observe the applicable laws and regulations on occupational safety and health and to comply with internationally recognized occupational safety standards. Our business partners are also required to ensure that they identify, evaluate, and monitor the extent to which their employees come into contact with chemical, biological, and physical materials or substances and are exposed to physically strenuous activities in order to avoid placing their employees under excessive physical and psychological strain.

In addition, we encourage our business partners to push ahead with continuous improvements in the work environment and implement procedures and systems to prevent, manage, follow up on, and report work-related injuries and illness. Business partners must also prioritize adequate training for all employees on occupational safety and health and on emergencies in the workplace.





## **2. Fair pay and working hours**

We expect all employees to be paid a living wage that allows them and their families to satisfy their basic needs and have a certain amount of disposable income. Business partners are required to ensure that their employees receive a compensation package that meets or exceeds the minimum standards established by law or set down in collective agreements or other agreements applicable to the industry. Beyond that, each business partner must grant its employees social benefits that align with the applicable national or local standards. Wages and salaries must be paid on time and in full, in the legal currency of the country where the employee works, and understandable information about pay must be provided in writing. Deductions from employees' pay are permitted only in accordance with applicable laws. Withholding any portion of wages or salaries as a disciplinary measure is prohibited.

Working hours must not exceed the maximum permissible under local law, and all ILO conventions applicable in the place of work with regard to working hours, breaks, and paid vacation must be observed.

The working hours structures introduced by the business partner must be congruent with the applicable national laws, legally permissible industry standards, and all ILO conventions applicable in the place of work with regard to working hours, breaks, and paid vacation.

## **3. Freedom of association and collective bargaining**

All business partners must safeguard their employees' fundamental rights to form, join, or consider joining unions and bodies representing employees, along with the right of collective bargaining in accordance with national laws.

Every business partner is expected to take an open stance toward union activities and to support their organizational activities. Employee representatives should be able to perform their representative functions in the workplace without fear of discrimination, reprisals, retaliatory measures, intimidation, or harassment.





Where national laws restrict the rights of freedom of association and/or collective bargaining, all business partners must take action to offer their workforce reasonable alternative forms of cooperation.

**4. Child labor** It is absolutely necessary for our business partners to have zero tolerance for exploitation of children and adolescents and to strictly prevent all forms of child labor as defined in ILO conventions 138 and 182 in their business procedures. The age of hiring for young employees must meet or exceed the standards set by local labor laws. If national law establishes stricter regulations on child labor or the minimum age at which employment is permitted, these provisions must be observed and given precedence. Business partners are not permitted to assign young employees to perform dangerous or hazardous work, to work at night or perform overtime, or to perform work that is incompatible with the young employee's personal development. Personal development includes health and physical, mental, and social development. Furthermore, all young employees must be protected against violence and abuse at all times. The interests of the young employee must be the prime consideration whenever a young employee is hired.

**5. Forced labor** There must be zero tolerance for any form whatsoever of forced or compulsory labor. This means that business partners must not practice involuntary employment or employment under threat of punishment or other sanctions, including forced overtime, work obligations, psychological or physical coercion, involuntary convict labor, slavery, serfdom, indentured servitude, or any form of human trafficking. This includes but is not limited to transporting, accommodating, recruiting, moving, and/or receiving persons through threats, violence, duress, deception, abduction, and/or fraud for purposes of employment/work or performance of services.





All business partners are required to ensure that all employees, whether permanent or temporary, receive a written contract in a language they understand. Furthermore, no hiring fees or similar fees can be charged for employment. Business partners are not permitted to withhold or retain, destroy, hide, confiscate, or deny access to employees' identification documents unless this is required by law. Moreover, any and all restriction of employees' freedom of movement, for example through mistreatment, threats, or practices such as withholding or retaining valuables, is prohibited.

Beyond that, all business partners commit to take effective action within their sphere of influence to prevent forced labor and any and all forms of modern slavery.

Business partners are obligated to prevent harmful soil changes, air, noise, and water pollution, harmful noise emissions, and excessive water use where these may adversely affect the resources needed to preserve and produce foods, along with any actions that impede access to drinking water and/or sanitary facilities or harm the health of individual persons.

#### **6. Protecting life, health, and living environments**

Business partners must conduct themselves responsibly within their local communities, respect the concerns of neighbors, and ensure healthy and safe living conditions. Business partners must respect the rights of indigenous peoples to the land, areas, and resources that they have traditionally possessed, occupied, or otherwise used or acquired.

Business partners must not restrict access to adequate food, clothing, water, and/or sanitary facilities in the workplace. If the company provides living space, business partners must ensure access to adequate living space.





Business partners must comply with the prohibition of unlawful eviction and deprivation of land, forests, and waters when acquiring, developing, or otherwise using land or real estate, particularly when the use thereof secures a person's livelihood.

**7. Contracting with security personnel**

When contracting with or requesting the deployment of public or private security personnel or forces to protect the company's projects or locations, all business partners must ensure through appropriate rules and measures that the actions of these personnel and/or forces in performing their duties fall within the bounds of internationally recognized human rights. This includes but is not limited to bodily injury or loss of life, adverse impacts on freedom of association and the freedom to form coalitions, and the prohibition of torture and cruel, inhumane, or degrading treatment.

**8. Training and qualifications**

Business partners are expected to support and develop the qualifications and professional skills and abilities of their employees at all levels through appropriate training and continuing education measures.





## V. Environmental protection and sustainability

Protecting the environment is a top priority for us. We are aware of our responsibility for the environment, which is why we pledge to minimize our environmental impact wherever possible.

### Sustainability and resource efficiency

We expect our business partners to take appropriate action to reduce the climate impacts of their business activities, engage in climate action and active environmental protection in accordance with internationally applicable standards, laws, and regulations, and continuously improve the effectiveness of their efforts in this domain.

This includes preventing emissions (particularly of CO<sub>2</sub>, which harms the environment) and waste wherever possible and making ongoing gains in resource efficiency. Business partners must take suitable and demonstrable measures and establish effective management systems (e.g., under ISO 14001 or another management system that meets a comparable standard) to ensure climate action. We encourage our business partners to press ahead with efforts to ensure safety and environmental friendliness in the development, production, packaging, transportation, and disposal of their products. We also expect our business partners to select resources such as water, energy, and raw materials with care, use them sparingly, and minimize their impact on natural resources and livelihoods.

In relevant cases, we expressly urge our business partners to ensure compliance with all prohibitions associated with the use and production of mercury and the handling of mercury waste in accordance with the Minamata Convention. Another top priority is compliance with the prohibition on the production and use of hazardous chemicals and the handling, collection, storage, and disposal of waste in environmentally inappropriate ways pursuant to the Stockholm Convention. It is also crucial to comply with all prohibitions on exports and imports of hazardous waste pursuant to the Basel Convention.





## VI. Business ethics

### 1. Behavior as a competitor

To protect free competition, all business partners must ensure compliance with relevant national and international antitrust laws and the laws against unfair competition. In particular, all business partners are obligated to avoid any and all business practices that unlawfully restrict competition, including price fixing, agreements on supply, market sharing, and improper sharing of competitive information, whether with competitors or via their own suppliers.

### 2. Corruption and bribery

Corruption also restricts free competition. Therefore, all business partners commit to comply with international and local anti-corruption laws and standards.

In all dealings with business partners (customers, suppliers) and government or state institutions, the interests of the company and the personal interests of employees must be kept strictly separate on both sides. Business partners are required to ensure that business decisions are made without any irrelevant considerations or personal interests being involved.

This means, in particular, that our business partners must not participate directly or through third parties in any form whatsoever of bribery, fraud, corruption, extortion, blackmail, embezzlement, or misappropriation. This also applies to any attempts to influence the personal interests of any of our employees or persons related to or associated with them.

Our business partners must ensure that our employees do not request, demand, or accept any unjustified personal advantages or perquisites from them in conjunction with their business activities. Therefore, our business partners are prohibited from offering any such personal benefits or perquisites.





In compliance with the laws on fighting bribery and corruption, we accept only customary and appropriate promotional gifts of token value for business purposes, along with invitations to business-related occasions that are of low value and do not have the potential to dishonestly influence business decisions. We expect our business partners to implement appropriate procedures to prevent bribery and corruption in all their business activities.

### **3. Export control and sanctions**

Each and every business partner commits to comply with the applicable import and export laws, and particularly to comply with official sanctions, embargoes, and other relevant laws, regulations, state and national guidelines, directives, and principles regulating the transfer, provision, or delivery of goods and/or technologies.

### **4. Product safety**

All business partners must observe all relevant country- and statespecific laws and regulations on product safety.

Furthermore, business partners must supply all relevant product information concerning composition, use, and, where applicable, disposal upon request and label their products properly, in each case with sufficient lead time before the products are delivered or the services performed.

Beyond that, all business partners commit to provide us with complete documentation concerning the legal compliance of the products and services they provide, including but not limited to safety data sheets and product labeling rules.

Business partners also pledge to comply with industry-specific requirements and legal specifications and to keep informed of and implement any changes. Where applicable, we expect that clinical trials and product tests involving animals, where these are unavoidable, are conducted in compliance with international guidelines and all applicable national and local laws and regulations. If possible, scientifically recognized alternatives that are accepted by the relevant authorities should be prioritized.





## **VII. Communication and complain management**

Reports of possible or actual violations of these standards or concerns regarding unlawful conduct or misconduct can be transmitted via the external whistleblowing and complaint management system, which can be accessed at [www.rottendorf.com](http://www.rottendorf.com).

Business partners must establish and maintain effective complaint mechanisms for their employees and other stakeholders or affected parties that permit these persons to report potential violations of the code of conduct.

## **VIII. Miscellaneous**

This code does not contain any declarations of intent for legal transaction purposes, which means it does not establish any legal claims or demands of third parties against us or our business partners. The term "third parties" includes associations or federations, employees, landowners, property owners, persons who live, work, and/or engage in recreation in proximity to activities along the supply chain, and other persons who may be injured or harmed due to a violation of human rights. This code of conduct for business partners was prepared in German and English. The German version is the operative version and takes precedence in the event of any conflict. Translations into other languages serve merely for informational purposes and are not binding. In the event of any discrepancy between the versions in other languages and the German version of this code of conduct, solely the German version is operative.





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