

## Lonza Supplier Code of Conduct

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### Who We Are

Lonza's activities touch many people's lives in a wide variety of industries. Maintaining the trust and confidence of these stakeholders requires Lonza to ensure that its values are translated into consistent and appropriate behavior worldwide.

Lonza promotes innovation and economic, social, and environmental sustainability in order to ensure the long-term success of our company and its stakeholders. Lonza is committed to sustainability in all business activities and aims to uphold the highest ethical standards.

### Compliance

Our Suppliers play an important role in our journey to enable a healthier world.

Lonza Suppliers must conduct their business in full compliance with all applicable international, national and local laws and regulations, contractual agreements and internationally recognized environmental, social and corporate governance standards.

We expect our Suppliers to strictly observe and comply with all the principles and expectations set forth in this Code, as well as in other policies that may be delivered by Lonza to Suppliers from time to time, in all of their activities and sites worldwide, including Lonza sites.

The expectations set forth in this Code are in line with the principles of, but not limited to, the United Nations Global Compact initiative, the International Labor Organization, the global Responsible Care® program, as well as of Responsible Sourcing initiatives of which we are a member.

Lonza reserves the right to assess (by Lonza or selected third parties) a Supplier's compliance with this Code of Conduct under the form of questionnaires, documentation review and/or an onsite audit(s) and request corrective actions. Lonza expects its Suppliers to similarly reserve the right to assess/audit their Suppliers as necessary to comply with the principles and obligations hereunder.

In the event that Lonza becomes aware of any actions or conditions not in compliance with this Code of Conduct, Lonza reserves the right to request corrective actions and/or immediately terminate any agreement with any Suppliers.

We may update this Code from time to time. It is the responsibility of the individual Supplier to ensure that it has read, understood and complies with the most up to date version of this Code.

This Code was last updated in May 2022.

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## 1. Ethics

Suppliers commit to conduct their business in an ethical and fair manner, and to act with integrity. Suppliers shall:

### a. Antitrust and Fair Competition

- conduct their business using fair business practices, consistent with free and fair competition and in compliance with all applicable competition, antitrust and trade laws, rules and regulations.

### b. Business Integrity, Anti-Corruption and Anti-Bribery

- refrain from any form of corruption, extortion, embezzlement and Bribery.
- not offer, solicit or accept Anything of Value, directly or indirectly, in any business or governmental relationship for the purpose of improperly obtaining or retaining a business advantage.
- refrain from proposing to any Lonza employee Anything of Value, with the exception of presents or promotional gifts of an insignificant monetary value, which are in accordance with local customs and all applicable laws, rules, and regulations.
- conduct their activities in full compliance with all applicable anti-corruption and anti-Bribery laws, including but not limited to, the United Kingdom (UK) Bribery Act and the United States (US) Foreign Corrupt Practices Act.

### c. International Trade Controls

- comply with all applicable trade sanctions laws, including sanctions of the United Nations (UN), the US Department of the Treasury's Office of Foreign Assets Control sanctions regulations, the US Export Administration Regulations, the UK Export Control Act of 2002 and the European Union (EU) as well as Swiss sanctions regulations.
- not engage in any prohibited business or dealings with embargoed countries, blocked persons, or individuals or entities listed by any applicable government; or facilitate prohibited transactions with third parties that involve embargoed countries, blocked persons, or individuals or entities listed by

any applicable government.

### d. Conflict of Interest

- take reasonable care to avoid and manage potential and actual conflicts of interest when fulfilling their contractual obligations to Lonza.
- notify all affected parties as soon as possible if an actual or potential Conflict of Interest arises.

### e. Conflict Minerals

- ensure that products supplied to Lonza do not contain metals or minerals or their derivatives originated from mining activities that directly or indirectly finance or benefit armed groups or perpetrators of serious human rights abuses.
- perform the necessary Due Diligence as specified by the OECD and in accordance with Responsible Minerals Initiative (RMI) reporting requirements (especially if requested by Lonza), to clarify the chain of custody and the circumstances of mineral extraction, trade, handling and export and to identify and assess any risk in relation to Conflict Minerals.

### f. Responsible Sourcing and Country of Origin

- not knowingly work with business partners who use Illegal Transshipment practices.
- carry out Due Diligence on the source of raw materials to promote legal and sustainable sourcing.
- when requested by Lonza, disclose information that shows the source and origin of raw materials provided to Lonza.

### g. Data Privacy, Data Security & Intellectual Property

- implement and maintain all technical and organizational measures in compliance with the General Data Protection Regulation "GDPR" in order to collect, store and use properly any confidential information and personal data made available to them. When data of the Supplier, its employees and its customers is entrusted, the data must be used according to the agreed purposes, in compliance with all applicable laws and assessed only by authorized individuals or

parties. Any Supplier treating personal data from the EU, Switzerland (CH), or UK citizens must ensure that, when delivering into a country with less restrictive data protection or privacy laws, compliance with the EU, CH, or UK laws or regulations is guaranteed.

- not use Lonza's name or that of our affiliates or products in publicly available materials or advertising without Lonza's prior written consent.

#### **h. Identification of Concerns**

- encourage and provide reporting channels (should be anonymous when permitted by Law) for their employees to share any concerns in case of misconduct or unlawful activities at workplace without any threat of intimidation, harassment or reprisal and in a confidential manner.
- investigate such reports and take appropriate corrective actions.
- notify Lonza of legal investigation, actions, or prosecutions that might affect their performance of Lonza business or that could potentially adversely affect their and Lonza's reputation.

Suppliers or Supplier's employees who wish to raise a concern regarding a suspicion of a violation) by Lonza or its employees of any laws or regulations or the Lonza Supplier Code of Conduct can do so by sending an e-mail to [compliancegroup@lonza.com](mailto:compliancegroup@lonza.com) or by using the Lonza Ethics & Compliance Hotline ([www.lonzaethicshotline.com](http://www.lonzaethicshotline.com)). The multilingual Ethics & Compliance Hotline can be assessed online or by phone and is available 24 hours a day, 7 days a week, worldwide with country-based toll-free numbers. The Ethics & Compliance Hotline is staffed by a third party reporting service. Where allowable by law, option to remain anonymous is available. All reports are managed with the strictest confidentiality.

## **2. Labor & Human Rights**

Suppliers commit to uphold the human rights of workers and to treat them with dignity and respect. Suppliers shall:

#### **a. Fair Treatment**

- provide their employees with a workplace free of inhumane treatment (such as corporal or physical punishment, sexual abuse, sexual harassment, mental or physical coercion or verbal abuse of employees) and free of threats of any such treatment.

#### **b. Fair Working Hours, Wages and Benefits**

- pursue a fair remuneration policy in compliance with all applicable local laws regarding working hours, minimum wages, overtime wages and mandated benefits. Compensation and benefits should aim at ensuring a living wage according to local living conditions.
- notify their employees of the method used to calculate wages, of requirement to work overtime and the wages to be paid for such overtime, in line with the applicable national laws and International Labor Organization (ILO) standards.
- prohibit deductions from wages for disciplinary reasons.
- pay on time and in full for the work employees have done, prior to them freely leaving the employer, according to applicable laws.

#### **c. Freedom of Association and Right to Collective Bargaining**

- respect their employees' right, as set by local laws, to freely associate, participate in any union of their choice, seek representation, submit grievances and report suspected legal violations, join workers' councils without fear of discrimination, termination of contract, reprisals, intimidation, or harassment. If the law is restrictive, Suppliers must not obstruct other legal means employed by workers to maintain dialogue with management, such as meetings, dedicated committees and workers' communications. The issue can also be discussed to take a collective decision in order to find the most appropriate remediation action to implement.
- encourage employees to freely, openly and directly communicate and engage with company management, to resolve workplace and compensation issues.

- not disadvantage the employees' representatives so that they can exercise their role without fear of reprisal or discrimination.

#### **d. Non-Discrimination**

- not discriminate against anyone in its workforce and in any manner based on ethnicity, national origin, color, religion, marital status, sexual orientation, gender identity or gender expression, creed, age, sex, disability, veteran status or any similar characteristic or class as defined by applicable law.
- have channels/mechanisms in place and accessible to all employees to report any discriminatory actions.

#### **e. Freely Chosen Employment (no modern slavery, Human Trafficking, child or forced labor)**

- prohibit involuntary work or work performed under the threat of penalty, including forced, prison, indentured labor, bonded labor, or other forms of slavery and/or servitude.
- avoid all use and forms of child labor in their business operations and act in line with the United Nations Global Compact principles, the International Labor Organization (ILO) labor standards and the OECD Guidance for Responsible Business. Where local laws are stricter by specifying a higher age for work or mandatory schooling, they precede.
- publicly declare zero tolerance of child labor in their own business operation and prohibit all forms of child or forced labor (including modern slavery and Human Trafficking) in its own supply chain network.
- perform the necessary Due Diligence as specified by the OECD and in accordance with the Swiss Responsible Business Initiative (SRBI), especially if requested by Lonza.

### **3. Health, Safety & Environment**

Suppliers commit to provide a safe and healthy working environment to their employees, customers, visitors, contractors, subcontractors and any others who might be affected by their activities. Suppliers commit to operate in an

environmentally responsible and efficient manner to minimize adverse impacts on the environment. Suppliers shall:

#### **a. Workers' Health and Protection**

- protect workers from over-exposure to chemical, biological and physical hazards, from physically demanding tasks in the workplace and in any company provided living quarters.
- provide a safe, clean and hygienic working environment, including, as a minimum, the provision of adequate number of restrooms, canteens, potable drinking water, adequate lighting, safe temperatures, ventilation, sanitation in the workplace and in any company provided living quarters.
- implement policies with the aim of creating an incident- and injury-free work environment, preventing the occurrence of occupational illness and health problems associated with its activities, identifying and rectifying any unsafe situations and working on continuous improvement of workplace conditions towards a healthy and safe environment.

#### **b. Emergency Preparedness and Response**

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

#### **c. Process Safety**

- have management processes in place to identify the risks from chemical and biological processes and to prevent or respond to catastrophic release of chemical, biological agents or other materials, including specific programs to prevent fire and explosion.

#### **d. Risk Information and Training**

- provide safety information to employees and contractors relating to identified workplace risk and Hazardous Materials, including pharmaceutical compounds and pharmaceutical intermediate materials.
- provide training on safety information.

#### **e. Environmental Authorizations**

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

#### **f. Waste and Emissions**

- have systems in place to ensure the safe handling, movement, storage, disposal, recycling, reuse, or management of waste, air emissions and wastewater discharges. Any waste, wastewater, or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment. This includes managing releases of active pharmaceuticals into the environment.

#### **g. Spills and Releases**

- have systems in place to prevent and mitigate accidental spills and releases to the environment. Emergency procedures and personnel should be in place to treat any accidental event presenting an environmental risk.

#### **h. Natural resource conservation and climate protection**

- take measures to improve efficiency, preserve natural resources (e.g. water, sources of energy, raw materials), avoid the use of Hazardous Materials where possible and engage in activities that reuse and recycle.
- ensure and demonstrate continuous environmental improvements by means of clear targets and improvement policies.
- engage in the development and use of environmental and climate-friendly products, processes and technologies.

## **4. Governance & Management Systems**

Suppliers commit to establish and run effective governance and management systems across their organization. Suppliers shall:

#### **a. Internal Documentation and Discipline**

- have established policies, rules, procedures, tools and indicators required to guarantee

adherence to all areas contained in this Code of Conduct and to ensure that their Suppliers and employees, consultants, contractors and subcontractors are aware of their rights and responsibilities.

- may take disciplinary actions against employees found to be in violation of company regulations. However, disciplinary actions shall not institute monetary fines, corporal punishment, harassment, degradation, or humiliation.

#### **b. Training and Competency**

- develop, implement and maintain appropriate training programs and measures to support their managers and employees in gaining an appropriate level of knowledge and understanding of the applicable principles and expectations as set forth in this Supplier Code of Conduct, the applicable laws and regulations and generally recognized standards.
- have grievance channels / mechanisms in place and accessible to all employees to report any violations of the principles, as set forth in this Code.

#### **c. Information & Continuous Improvement**

- provide truthful information to Lonza or Lonza's selected assessment/audit partner in the course of Lonza's Supplier screening, assessment or audit and commercial negotiation. Suppliers must be fully transparent with Lonza and any third-parties working on our behalf.
- demonstrate their commitment to continuous improvement by implementing mechanisms to regularly identify, evaluate and manage risks in all areas addressed by this Code of Conduct, setting performance objectives, executing business continuity plans and taking necessary corrective actions for deficiencies identified by internal or external assessments and audits, as requested by Lonza, or any other customer.

#### **d. Communication of Sustainability Expectations and notification of non-compliance**

- use their best effort to pass along the

principles and expectations set forth in this Code to their own Suppliers and subcontractors.

- in the event Suppliers become aware that their supply chain is or might be affected by violations of the terms or principles hereof, Suppliers shall immediately notify Lonza and propose corrective actions.

## 5. Glossary

### **Anything of Value**

includes cash, gifts to family members, forgiveness of a debt, loans, personal favors, entertainment, meals and travel, political and charitable contributions, business opportunities, and medical care among other items.

### **Applicable Sources of Trade Sanctions**

United Nations (UN)

U.S. Department of the Treasury's Office of Foreign Assets Control sanctions regulations

U.S. Export Administration Regulations

UK Export Control Act of 2002

European Union (EU)

### **Bribery**

Means giving, offering, or promising Anything of Value to gain an improper business advantage.

### **Conflict of Interest**

A Conflict of Interest arises when a Supplier's employee's or contractor's personal or family interest, activities or relationships interfere with his or her objectivity in doing what is best for the business.

### **Conflict Minerals**

Mining is an intensive process involving potential social and environmental risks that, if not properly managed, can cause lasting negative impacts. A growing body of research suggests that these risks are associated with Conflict Minerals, a variety of metals and minerals that extend beyond cassiterite, columbite/tantalite, and wolframite (the most common derivatives of which are tin, tantalum and tungsten, respectively) and gold (commonly known as 3TG). For more information please see:

[www.responsiblemineralsinitiative.org](http://www.responsiblemineralsinitiative.org)  
[Swiss conflict minerals regulation](#)

### **Due Diligence**

An ongoing, proactive and reactive process through which companies identify, assess, prevent, mitigate and account for how they address their actual and potential adverse environmental, social and governance impacts.

### **Hazardous Materials**

As defined by the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), prepared by the [UN Economic Commission for Europe](#).

### **Human Trafficking**

Human Trafficking involves recruitment, harboring or transporting people into a situation of exploitation through the use of violence, deception or coercion and forcing them to work against their will.

### **Illegal Transshipment**

Is defined as claiming a false country of origin to circumvent quota, additional duties or fees, and/or other restrictions applicable to the shipment.

### **International Labor Organization (ILO)**

The [UN agency ILO](#) brings together governments, employers and workers of 187 UN member states to set labor standards, develop policies and devise programs promoting decent work for all employees.

### **Organization for Economic Co-operation and Development (OECD)**

[OECD](#) is an international organization that works to build better policies for better lives.

### **Responsible Care Global Charter (Responsible Care)**

Global chemical industry's unifying commitment to the safe management of chemicals throughout their life cycle, while promoting their role in improving quality of life and contributing to sustainable development

[Responsible Care - International Council of](#)

## [Chemical Associations](#)

### **Responsible Mineral Initiative (RMI)**

Founded in 2008 by members of the Responsible Business Alliance (RBA) and the Global e-Sustainability Initiative (GeSI), the [RMI](#) has grown into one of the most utilized and respected resources for companies addressing responsible mineral sourcing in their supply chains.

### **Responsible Sourcing**

Means a commitment of Lonza to upholding high social, environmental, governance and ethical standards when making sourcing decisions.

### **Suppliers**

Suppliers refer to any legal or natural third party that provides any type of goods, raw materials or services to Lonza and/or its subsidiaries and such third party's Suppliers, contract manufacturers agents, temporary workers or subcontractors.

### **Swiss Responsible Business Initiative (SRBI)**

The Due Diligence requirements of the new [Swiss conflict minerals regulation](#) have been defined analogous to the requirements of [EU Regulation 2017/82137](#). Companies and individuals in the scope of the regulation must implement a 5-step framework which is based on the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas \(CAHRAs\)](#)

### **United Nations Global Compact (UNGC)**

Driven by the [United Nations \(UN\)](#), a voluntary initiative based on CEO commitments to implement universal sustainability principles (also known as "[The Ten Principles of the UN Global Compact](#)") and to support UN goals such as the [Sustainable Development Goals](#).



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