

# **Suppliers.**

## **Code of conduct.**

# Opella has pledged.

To support and apply its fundamental principles in the areas of human rights, working conditions, environment and fight against corruption.

Opella wishes to partner with all its suppliers to share the values of the company.

This supplier code of conduct is part of the responsible procurement and approach of Opella and a key element of its vigilance plan.

It commits the supplier to strictly observe and comply with all the fundamental principles expressed herein, in all its activities and sites worldwide.

Suppliers are also expected to ensure their own suppliers comply with these requirements.

**The suppliers shall build a management system and train their people in order to:**

- Implement this code of conduct and comply with it.
- Ensure compliance with local and national laws and regulations.

**Respect of this code of conduct by the suppliers will determine both the onboarding and the continuing commercial relationship between the suppliers and Opella.**

**Opella is dedicated to supporting people and putting health in their hands, guided by strong ethical principles.**

With a team of 11,000 passionate individuals unafraid to challenge the status quo, Opella is a brand-led company that places consumers at the heart of everything we do. United by a single mission, we strive to transform self-care and make it as simple as it should be.

**Opella.** Health.  
In your hands.

# Labor.

Suppliers are expected to comply at least with international human rights treaties, without prejudice to more favorable national laws. In particular, the observance of ILO (International Labor Organization) fundamental conventions by suppliers is an essential requirement for Opella.

**They include the following aspects:**

## **Child labor.<sup>1</sup>**

Suppliers are not engaged in or not support any forms of child labor, do not employ person under the age of 15 (or under the legal age for finishing compulsory schooling) or person under the age of 18 for hazardous work.

## **Forced labor.<sup>2</sup>**

Suppliers are not engaged in nor support worker exploitation amounting to forced labor. They give employees the right to enter into employment voluntarily and freely, without the threat of penalty and the right to freely terminate employment voluntarily by means of notice of reasonable length at any time and without penalty. They ensure that all employment contracts are written and transparent and include comprehensive provisions for employees.

## **Violence and harm.**

Suppliers will respect the physical or psychological integrity of persons and will not tolerate any practice such as inhuman treatments, physical punishments, insults, harassment, mental or physical coercion.

## **Discrimination.<sup>3</sup>**

Suppliers do not tolerate any forms of discrimination and treat all its employees equally, regardless of any characteristics other than their ability to do their jobs. It must consider that qualifications, skill and experience are the basis for the recruitment, placement, training and advancement at all levels.

<sup>1</sup> Child labor is understood to be the work carried out by any person under the age of 18: that is economically exploitative, or that interferes with the child's education, or that is dangerous or harmful for the child's health or physical, mental, spiritual, moral or social development ("hazardous work"), or that does not adhere to the conditions on minimum working age. [ILO conventions No 138 and 182]

<sup>2</sup> "the term forced, or compulsory labor shall mean all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily" [ILO Convention No. 29 and 105].

<sup>3</sup> Discrimination occurs when a person is treated less favorably than others because of characteristics (gender, gender identity, age, origin, religion, sexual orientation, physical appearance, health, disability, trade union activity, political opinions, nationality and family situation,) that are not related to the person's competencies or the inherent requirements of the job. Discrimination may occur at all stages of the employment and occupation: recruitment, remuneration, entitlements, hours of work and rest, paid holidays, maternity protection, security of tenure, job assignments, performance assessment and promotion, training opportunities, job prospects, occupational safety and health, termination of employment.

**Suppliers must offer decent working conditions to their employees, and in particular in terms of:**

## **Working hours.<sup>4</sup>**

Suppliers must respect working time in accordance with national legislation.

## **Wages and fringe benefits.<sup>5</sup>**

Suppliers guarantee that wages are paid regularly and allow employees and their family to meet their basic needs.

## **Freedom of association.<sup>6</sup>**

Suppliers recognize that all employees are free to form and/or join a workers' organization of their own choice and do not interfere with this right. They prohibit any intimidation, harassment, punishment or discrimination against employee due to trade union activities and do not discourage employee from joining organizations of its own choosing. They respect the right to collective bargaining and the role of workers' organizations for the purpose of collective bargaining and it commits to bargain in good faith.

They allow workers organizations to act entirely independently, by giving them reasonable access to the information, resources and means necessary to accomplish their missions.

<sup>4</sup> Generally speaking, the work time does not exceed 60 hours per week, with a minimum of one day of rest per week.

<sup>5</sup> The minimum wage paid to employees as well as the fringe benefits are in conformity with country laws (including apprentices, trainees or employees during the trial period). While in compliance with country laws relating to the maximum authorized labor time, overtime work is paid at a higher rate than normal hours. The employee is duly notified of the method used to calculate wages. Wages are paid in cash, by check or by bank transfer, to the exclusion of any other form of compensation, except in the specific cases provided for by country regulations. Wages are paid at regular intervals and with reasonable frequency. Deductions from wages for disciplinary reasons are prohibited.

<sup>6</sup> Right for workers and employers, without any distinction (occupation, sex, color, race, etc.), to establish and to join independent labor organizations of their own choosing without prior authorization and without interference from the State or any other entity [ILO Convention n°87 and 98]

# Health and safety.

Suppliers provide a safe and healthy working environment for all employees and contractors working at their sites and if applicable healthy living quarters.

That includes compliance with the applicable local and national regulations.

## **Workers' health, safety protection.**

Suppliers shall protect workers, contractors, visitors from any accidents or occupational diseases.

Suppliers shall have programs to identify, assess and manage processes safely, in order to prevent:

- physical hazard (electricity, fall...)
- occupational over-exposure to chemicals, pharmaceutical compounds, biological agents, stress...
- catastrophic events (chemical release, explosion, fire...)
- major business interruption

Suppliers shall operate and maintain its buildings, operations, equipment in the safest manner possible.

For the most hazardous processes, the supplier shall conduct specific risk analyses in order to implement measures avoiding damage inside and/or outside the site.

## **Hazard information and training.**

Safety information for any identified workplace risks shall be made available to inform and train workers to protect them from the risk.

This includes safety information about hazardous substances used: chemicals, active pharmaceutical ingredients, intermediates products.

## **Emergency preparedness and response.**

Suppliers shall identify and assess possible emergency situations in the workplace or living quarters and minimize their impact inside/outside the site by implementing safety barriers, emergency response plans and procedures.

# Environment.

Suppliers ensure that programs are in place at all their sites in order to minimize the use of hazardous substances and ensure to operate their sites and activities in an environmentally responsible and efficient manner to minimize adverse impact on the environment.

## **Compliance with legal and regulatory requirements.**

Suppliers ensure compliance with all the applicable local, national, regional and international (when applicable) regulations relating to environmental protection within the countries where they carry out their activities.

All required environmental permits, licenses and chemical registrations shall be obtained and kept up-to-date. Their operational and reporting requirements shall be followed.

## **Climate Change.**

Suppliers measure and report their carbon footprint and greenhouse gases emissions<sup>7</sup> and pledge to voluntarily reduce them.

## **Releases in the Environment (Air, Water, Soil).**

Suppliers do their best efforts to reduce and even prevent emission sources generated by their activities.

Any waste, wastewater discharge or air emissions with potential to adversely impact human or environment health shall be appropriately managed, measured, controlled and treated prior to release into the environment.

The traceability of these discharges or disposal is assured.

The waste management shall favor waste prevention, recycling or recovery of waste and use of recovered materials.

Suppliers shall evaluate and minimize the environmental impacts of its pharmaceutical substances from manufacturing activities.

## **Pollution prevention.**

Suppliers make sure that all the substances presenting an environmental risk are identified, labelled, stored, handled and shipped in a manner that prevents and mitigates accidental spills and releases to the environment.

A prevention plan and emergency preparedness plan are in place to treat any chronic or accidental event presenting an environmental risk (air, soil, water and groundwater) inside or outside the site.

## **Resources management.**

Suppliers do their best to reduce **energy and water** consumption in order to preserve natural resources.

Suppliers preserve **biodiversity** locally in its sites and indirectly, through their purchased raw material policy.

# Business ethics.

Opella has been engaged for many years in fostering, an ethical culture aiming at reaching the highest standards in terms of responsibility and business integrity. When selecting suppliers or services providers, Opella is looking for much more than a source of goods or services. It seeks to build a relationship based on trust with business partners that understand and share the same values and ethical principles as Opella.

## **Therefore, Opella requires that all suppliers and service providers:**

- Respect the highest ethical standards in all their activities with Opella but also all applicable national and international laws and regulations regarding the prevention of and fight against bribery and corruption. This commitment must be extended, by suppliers or services providers, to all the third parties to whom they may subcontract all or part of their tasks or services for Opella.
- Declare any conflict of interest that may affect the performance of tasks or provision of services entrusted to them by Opella. Because Opella's decision must solely be based on the performance and quality of the products and services supplied and not on any form of hidden benefit of conflict of interest.
- Refrain from proposing to Opella employees any sum of money, gifts, loans, rebates, valuable objects. Please note that Opella employees are not authorized to receive gifts other than token gifts intended to promote your company or your products or services (max. value 5 euros or equivalent) and cannot accept invitation to social activities.
- Undergo a risk based due diligence aiming at assessing any potentially exposure to corruption and/or any other illicit/ inappropriate practices.
- To accept the inclusion of specific anti-bribery provisions in contracts binding them to Opella.
- Confirm that they are in agreement with the Opella Corporate Code of Conduct available at [www.codeofconduct](http://www.codeofconduct) Opella or confirm that their Corporate Code of Conduct incorporates the spirit of Opella's Code of Conduct.

## **Measuring procedures, tools and indicators.**

The suppliers possess all of internal measuring procedures, tools and indicators that are necessary and sufficient to guarantee adherence to the principles listed above.

## **Compliance assessment.**

The suppliers agree that Opella shall have the right to have a third party, approved by both parties, check compliance to the principles contained in this Code.

# Privacy & Data Protection.

Privacy and the protection of personal data is crucial for Opella in the digital era.

In this respect, Opella is committed to ensure that all partners, suppliers or third parties it has dealing with provide an adequate level of data protection for all personal data.

## **Therefore, Opella requires that all suppliers and service providers:**

- Respect the highest standards of protection for Personal Data in any and all processing of Personal Data implemented on the basis of its relationships with Opella as well as all applicable national and international laws and regulations relating to Personal Data protection. This commitment must be extended, by suppliers or services providers, to all third parties to whom they may subcontract all or part of the tasks or services provided to Opella.
- Implement adequate technical and organizational security measures to prevent any accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.
- Should a personal data breach occur, contain, handle and, where relevant, notify to Opella any personal data breach related to personal data processed on the basis of its relationships with Opella.
- Manage, handle and, where relevant, respond and/or notify to Opella any exercise of his/her personal data protection rights by any Data Subject.
- Ensure proper training of its personnel regarding privacy and data protection as well as on the implementation of adequate security measures.
- Undergo, through a risk-based questionnaire, a review aiming at ensuring Opella that its suppliers, distributors, agents, and business partners are complying with Data Protection obligations.
- To accept the inclusion of specific Personal Data Protection provisions in contracts binding them to Opella.

## **Measuring procedures, tools and indicators.**

The supplier possesses all of internal measuring procedures, tools and indicators that are necessary and sufficient to guarantee adherence to the principles listed above.

## **Compliance assessment.**

The supplier authorizes Opella to have a third party approved by both parties check compliance to these principles.

## **CONTACT.**

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