

## Lonza Supplier Code of Conduct (hereinafter “Code of Conduct”)

---

### 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. We are committed to sustainability and decarbonization in all business activities and aim to uphold the highest ethical standards.

### Compliance

Our Suppliers play an important role in helping us to fulfil our purpose 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’s principles and declarations, the International Bill of Human Rights, 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.

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 take appropriate mitigation steps, which may include but are not limited to termination of an agreement with a Supplier.

This Code of Conduct does not prevent Lonza and its Suppliers from establishing more specific and stringent requirements either contractually or independently through their respective internal governance documents.

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 October 2023.

## Table of Contents

1. Ethics .....	3
2. Labor & Human Rights.....	4
3. Occupational Health & Safety .....	5
4. Environment .....	6
5. Governance & Management Systems .....	6
6. Glossary .....	7

## 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

- not engage in any form of corruption, extortion, embezzlement, bribery or misuse of funds.
- 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 but not limited to regulations set by 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 Switzerland.
- refrain from conducting any restricted business activities or dealings with embargoed nations, countries, blocked persons, or individuals or entities blacklisted by any governing body; or facilitating any transactions that involve such restricted

parties.

- employ robust due diligence procedures, ensuring transparency and accountability, to prevent complicity in any activities that undermine international laws and standards as per points above.

### 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. Responsible Sourcing of 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 (Conflict Minerals).
- perform the necessary Due Diligence as specified by Lonza's Public Policy Statement on Conflict Minerals and any applicable law or regulation to which Supplier is subject 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. Country of Origin

- 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", if applicable, or any other applicable national law, in order to collect, store and use properly any confidential information and personal data (altogether "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 and regulations is guaranteed. Lonza commits to comply with the EU General Data Protection Regulation worldwide, unless there is any other more rigid data protection law that it then aims to follow. Lonza expects the same strict compliance from its Suppliers.

- not use Lonza's name or that of its affiliates or products, or identifiable information about the company, 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 accessed 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 labor and 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 and abusive behavior (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 Human Trafficking, Child Labor, Forced or Compulsory 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 in line with the International Labor Organization (ILO) labor standards, in particular the ILO Forced Labor Convention (No. 29) and the ILO Abolition of Forced Labor Convention (No. 105).
- avoid all use and forms of child labor in their business operations and act in line with the United Nations Global Compact principles, in particular the United Nations Convention on the Rights of the Child, the International Labor Organization (ILO) labor standards, in particular the ILO Minimum Age Convention, 1973 (No. 138), ILO Worst Forms of Child Labour Convention, 1999 (No. 182) and the ILO-IOE Child Labour Guidance Tool for Business, and the OECD Guidance for

Responsible Business Conduct. Where local laws are stricter by specifying a higher age for work or mandatory schooling, they precede.

#### **f. External Stakeholder Human Rights**

- commit to respect the human rights of external stakeholders, including but not limited to the communities in which they operate and workers in their upstream supply chain. When doing so, particular emphasis shall be placed on the respect for human rights of at-risk individuals or groups, such as human rights defenders, indigenous people and other marginalized or vulnerable people.

### **3. Occupational Health & Safety**

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 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.

## **4. Environment**

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

#### **a. 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.

#### **b. Waste and Emissions**

- appropriately manage, control and treat any waste, wastewater, or emissions with the potential to adversely impact human or environmental health prior to release into the environment. This includes managing releases of active pharmaceuticals into the environment.

#### **c. 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.

#### **d. Natural Resource Conservation, Biodiversity**

#### **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, engage in activities that reuse and recycle.
- take measures to contribute to the conservation of biological diversity, and avoid and address land, marine and freshwater degradation, including deforestation.
- 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, technologies and/or services, including the development of measures to reduce the environmental impact of products during end of life.
- set science based targets to reduce the greenhouse gas (GHG) emissions caused by their operations directly (scope 1) and indirectly (scope 2) in line with the Paris Agreement goals and with Lonza's latest climate targets available in our Responsible Sourcing website (<https://www.lonza.com/sustainability/responsible-sourcing>)
- make reasonable efforts to continuously improve the measurement and reporting of GHG emissions caused in their value chains (scope 3), and preferably set targets to reduce these emissions in line with the Paris Agreement goals.
- provide the carbon footprint of representative products or services to Lonza, if available.

## **5. 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, as well as in other policies that may be delivered by Lonza.

- 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 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 Principles and Notification of Non-compliance**

- use their best effort to pass along the principles 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.

## **6. 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**

As defined in Lonza's [Public Policy Statement on Conflict Minerals](#).

### **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](#).

## International Bill of Human Rights

The [International Bill of Human Rights](#) is the name given to international treaties on human rights established by the United Nations (Universal Declaration of Human Rights; International Covenant on Economic, Social and Cultural Rights; International Covenant on Civil and Political Rights).

## 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.

The ILO Conventions cover a wide area of social and labor issues including basic human rights, minimum wages, industrial relations, employment policy, social dialogue, social security and other issues.

[Minimum Age Convention \(No. 138\)](#)

[Worst Forms of Child Labors Convention \(No. 182\)](#)

[Forced Labor Convention \(No. 29\)](#)

[Abolition of Forced Labor Convention \(No. 105\)](#)

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

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

The [OECD Due Diligence Guidance for Responsible Business Conduct](#) provides practical support to enterprises on the implementation of due diligence measures to avoid and address adverse impacts related to workers, human rights, the environment, bribery, consumers and corporate governance that may be associated with their operations, supply chains and other business relationships.

## Responsible Care Global Charter (Responsible Care)

The 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 Sourcing

For Lonza, Responsible Sourcing is our commitment to upholding high social, environmental, governance and ethical standards when making sourcing decisions.

[Responsible Sourcing | Lonza](#)

[Responsible Supplier Toolkit | Lonza](#)

## Suppliers

Suppliers refer to any legal or natural third party<sup>1</sup> 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) counterproposal

The [Swiss Responsible Business Initiative counterproposal](#) requires Swiss companies to comply with due diligence and reporting obligations, in particular with respect to Child Labor and Conflict Minerals.

## 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](#).

---

<sup>1</sup> Including but not limited to suppliers, original material manufacturers, repackers, sterilizers, distributors, vendors, consultants, agents, contractors, sub-contractors, advisors,

temporary workers.

All trademarks belong to Lonza or its affiliates or to their respective third party owners. The information contained herein is believed to be correct and corresponds to the latest state of scientific and technical knowledge. However, no warranty is made, either expressed or implied, regarding its accuracy or the results to be obtained from the use of such information. Some products may not be available in all markets or for every type of application. Any user must make his own determination and satisfy himself that the products supplied by Lonza Group Ltd and the information and recommendations given by Lonza Group Ltd are (i) suitable for intended process or purpose, (ii) in compliance with environmental, health and safety regulations, and (iii) will not infringe any third party's intellectual property rights.

© 2023 Lonza

Lonza Group Ltd

Muenchensteinerstrasse 38

CH-4002 Basel

Switzerland

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