



CODE OF CONDUCT **BUSINESS PARTNERS**

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Dear Partners,

The Arkopharma Group and the Dermapharm Group to which it belongs are committed to ensuring that their activities, in France and abroad, are conducted in compliance with current legislation, regulations and social, ethical and environmental standards.

Arkopharma is a committed and responsible company whose strategy is based on three key areas:

- Embodying sustainable industry
- Contributing to the well-being of women and men
- Taking action for the climate and to preserve biodiversity

Promoting and adopting ethical behaviour and integrity is a prerequisite both for all Arkopharma employees and for our Business Partners, who contribute to our success every day.

That is why it is important that our Partners comply with the same standards of respect for human rights and labour law, occupational health and safety, business integrity and environmental protection in their dealings with Arkopharma and their own partners, throughout their supply chain.

We consider that adherence to the principles of this Code by our Partners is a major criterion in the selection of new third parties and the continuity of business relationships in order to be in line with our strategy and our ambitions in terms of Social, Environmental and Good Governance issues.

Christophe MOSSE,
Managing Director

INTRODUCTION

This Code of Conduct for Business Partners (hereinafter "**the Code**" or the "**Code of Conduct**") reflects the Arkopharma Group's commitment to the ethical rules and principles that it intends to apply in its business relationships with all of its Business Partners.

The term "**Business Partners**" (or "**Partners**") includes suppliers, service providers, subcontractors, intermediaries, customers and, more generally, any third party having a business relationship with Arkopharma.

This Code of Conduct is part of Arkopharma's CSR (Corporate Social Responsibility) approach and Ethics and Compliance Program. Each Arkopharma employee and executive adheres to these commitments, which are set out in the Arkopharma Group's internal Ethics Charter, available on the website <https://fr.arkopharma.com>. The Ethics Charter and this Code form the basis of the values and principles of business conduct within the Arkopharma Group.

As a matter of reciprocity, Arkopharma expects its Business Partners to comply with applicable international and national laws, principles, standards and regulations in all countries where they do business and to respect the principles set forth in this Code. The provisions of this Code are not a substitute for applicable laws and regulations but are intended to provide guidance to Business Partners on the ethical rules and practices to be followed in their business dealings with Arkopharma. In the event of a discrepancy between the provisions of this Code and the texts and regulations of the countries in which the Partner is active, the most restrictive principles will apply.

In addition to the principles set out in this Code of Conduct, Arkopharma expects its Business Partners to comply with the principles set out in the International Labour Organization (ILO) Conventions, the Universal Declaration of Human Rights and the United Nations Global Compact in all matters covered by this Code.

The Partners undertake to promote and apply the principles of the Code to its own suppliers, subcontractors and other service providers in order to ensure that these principles are adopted and applied by its own partners.

1. SOCIAL RESPONSIBILITY

EMPLOYEE WELFARE, HUMAN RIGHTS AND LABOUR RIGHTS

1.1. Child labour

Arkopharma does not tolerate child labour. Partners must ensure that its workers are not younger than the minimum legal age for employment in the country concerned or the age at which compulsory schooling ceases in that country. The employment of children under the age of 15 is strictly prohibited. Minors may not be employed for work that is dangerous or likely to endanger their physical or moral integrity.

1.2. Forced labour and all other forms of modern slavery

The Partners must ensure that the work is voluntary and not carried out under mental, physical or verbal coercion or threat. Any restriction on freedom of movement or withholding of personal documents is strictly prohibited.

1.3. Health and safety in the workplace

Partners shall provide a safe and healthy working environment for their employees. They shall comply with all applicable laws, regulations and standards relating to hygiene, health and safety.

1.4. Discrimination

The Partners are required to ensure that there is no form of discrimination, in particular in the context of recruitment, hiring, remuneration, training, working conditions, assignment, promotion/advancement and termination of employment relationships, on the grounds of age, origin, membership or non-membership of a particular ethnic group, nation, race or religion, generic characteristics, gender, sexual identity or orientation, state of health, pregnancy, disability, family situation, surname, trade union activities, morals, political opinions or place of residence. Certain differences in treatment may be permitted provided that they are based on competence or experience, that they are based on objective and relevant criteria, and that they meet an essential and determining occupational requirement, provided that the objective pursued is legitimate and the requirement proportionate.

1.5. Harassment and sexual harassment

The Partners are committed to protecting employees from any form of harassment, intimidation or victimisation, whether physical, psychological or sexual.

1.6. Remuneration, working hours & working schedule

Partners must comply with all applicable local provisions relating to the legal minimum wage, working hours, overtime and weekly rest periods for employees. They shall comply with local legal and industrial standards. Partners shall entitle their employees to paid annual leave, social benefits and cover, as well as public holidays in accordance with national law.

1.7. Freedom of association and trade unions

The Partners undertake to comply with the laws in force concerning collective bargaining and the free exercise of trade union rights.

2. ENVIRONMENTAL RESPONSIBILITY

ENVIRONMENTAL AND CLIMATE PROTECTION

2.1. Compliance with applicable environmental standards

Arkopharma is committed to conducting its business in a sustainable and environmentally responsible manner in accordance with all applicable national and international environmental and climate protection legislation, regulations and standards. Partners are expected to demonstrate environmental responsibility and to comply with the laws, regulations and standards applicable in the countries in which they operate.

2.2. Minimising adverse effects on the environment

The Partners undertake to continually minimise the negative impact of their activities on the environment (greenhouse gas emissions, energy consumption, management of water resources, waste management, management of chemical products, air quality, etc.) by setting objectives to limit this impact.

Partners shall use their best endeavours to ensure that the handling, storage, transport, reuse, recycling and disposal of all types of waste and waste water are carried out safely and in accordance with applicable regulations.

2.3. Preserving biodiversity

The Partner undertakes to minimise any negative impact on the preservation of biodiversity in all its activities.

2.4. Continuous improvement

The Partners undertake to encourage initiatives and actions designed to promote greater responsibility in preserving the environment.

3. BUSINESS INTEGRITY AND ETHICS

3.1. Combating corruption, influence peddling and illicit payments

Arkopharma does not tolerate any form of corruption, whether active or passive, public or private, direct or indirect, or other breaches of integrity (trading in influence, extortion, embezzlement, money laundering, etc.) and is firmly committed to combating these practices. Arkopharma expects its Partners to make the same commitment both to themselves and to their own partners and to adopt behaviour and ethical standards that promote integrity, loyalty and transparency.

The Partner must comply with national and international laws, principles, standards and regulations relating to the fight against corruption. To this end, it shall refrain from accepting or offering, directly or indirectly, any undue advantage in the context of its duties, particularly in the form of illicit payments of money, and/or the supply of gifts, services or unauthorised advantages.

With the objective of fighting corruption, Arkopharma strictly regulates the giving and receiving of gifts, business meals, invitations and business trips in its *Gifts & Invitations Policy*. Any benefit or gift/invitation must be modest and of reasonable value, be of an exceptional nature and comply with local regulations in the countries in which Arkopharma operates.

The offer or acceptance of such advantages is prohibited in certain circumstances such as calls for tender, negotiations or before a signature/decision is signed. In any event, they must be made transparent and free from any illegitimate or illicit influence on the person who made them. Failure by a Partner to comply with these provisions may result in its exclusion from a tender or the termination of its contract with Arkopharma.

3.2.Preventing conflicts of interest

Arkopharma expects its employees and business partners to exercise objective, impartial and fair judgment and to place Arkopharma's interest above any other personal interest in the management of their business or employment relationships.

Partners are required to ensure that they do not use their professional position to obtain direct or indirect personal benefits and to inform Arkopharma of any situation that may constitute a real, potential or apparent conflict of interest (e.g.: an Arkopharma employee has a significant private, professional or financial interest in one of Arkopharma's activities).

Partner).

3.3.Respect for free competition

The Partner undertakes to comply with the laws and regulations applicable to competition law, and to demonstrate loyalty and integrity in its commercial relations. It undertakes not to engage in any practice that might hinder free competition.

3.4.Confidentiality and intellectual property

Partners are required to protect and use Arkopharma's confidential information in a careful and appropriate manner. Confidential information is non-public information and, more specifically, any information that is of commercial or strategic value to Arkopharma, the disclosure of which may be harmful to Arkopharma.

Partners agree to respect the intellectual property rights of Arkopharma and as such, shall not use the name, trademark, designs, patents, domain names or products of Arkopharma or its affiliates without the prior written consent of a person authorized to represent Arkopharma.

3.5.Data protection and privacy

The Partners undertake to comply with the laws and regulations applicable to the protection of personal data and to respect for privacy, understood as follows
the General Data Protection Regulation (2016/679), EU regulation of 27 April 2016, the Data Protection Act no. 78-17 of 6 January 1978, amended by Act no. 2018-493 of 20 June 2018, and the recommendations of the CNIL (Commission Nationale Informatique et Libertés).

3.6.International trade

Partners are required to comply with all applicable export control laws and regulations and to provide accurate and complete information to the competent authorities or customs.

3.7.Image preservation

Arkopharma reminds you that preserving its image and reputation is essential to its development, and requires each of its Partners to be aware of their responsibility in this respect and to comply with the following principles. Public comments made by Partners must not be insulting, abusive, disgraceful or disrespectful to any person, and must not be of a political, religious, sexual or racist nature or any other nature that may have a negative impact on Arkopharma's image and reputation.

4. IMPLEMENTATION OF THE CODE

4.1. Checking compliance with the Code

To ensure compliance with the provisions of this Code, Arkopharma reserves the right to monitor and/or assess whether Partners are taking (i) all necessary steps to ensure compliance within their organisation and (ii) reasonable steps to ensure compliance by their own business partners. In doing so, Arkopharma may use the services of an independent third party specifically appointed for this purpose.

As part of these checks, the Partner undertakes to cooperate and to provide any information and/or documents legitimately requested. The Partner undertakes to implement any necessary corrective measures identified as a result of the checks within the specified timeframes.

4.2. Warning system

Arkopharma provides its Employees and Partners with a whistleblowing system enabling them to report (anonymously if possible), without direct financial compensation and in good faith, behaviour or situations that are contrary to the Ethics Charter or this Code, crimes or misdemeanours, violations or attempts to conceal violations of laws/regulations/laws of the European Union or any international commitment ratified by France, or threats or harm to the general interest. The reporting channels are as follows:

- Secure web platform: <https://arkopharma.besignal.com>
- Telephone line with voice server (France only): 01 86 47 67 97 (code: 1980)

Complaints are collected and processed in accordance with the legal provisions in force and the Complaints Collection and Processing Procedure, which is available on the [Arkopharma website](https://fr.arkopharma.com) <https://fr.arkopharma.com> or on request.

4.3. Penalties for breaches of the Code

Arkopharma may decide to immediately terminate the business relationship with the Partner in the event of a serious breach of the principles set out in the Code and/or the refusal of the Partner to take the necessary steps to resolve the non-conformities brought to its attention within a reasonable period of time.

4.4. Contact

For any questions relating to this Code, Partners are invited to contact their usual contact person or the Compliance Officer at compliance@arkopharma.com.

Version history

Version	Date of update	Description the update	Author of the update
1	2019	Creation of the code of conduct	Legal department
2	04/11/2022	Addition of the section on the warning system	Compliance Manager
3	26/09/2024	Modification of the structure of the document, addition of the Preface, development of the environmental section	Compliance Manager