



Code of Ethics Partners



I. Preamble

This code of ethics (hereinafter "**the Code**") reflects Arkopharma's commitment to ethical rules and principles in conducting business with all its partners. It is part of Arkopharma's CSR (Corporate Social Responsibility) approach and of its ethics and compliance program. Each Arkopharma employee and manager adheres to these commitments, which are embodied in the Code of Ethics of Arkopharma.

Arkopharma expects its Partners to comply with the international and national laws, principles, standards, and regulations in force in all countries where they operate and to respect the principles listed in this Code.

The signature of the Code by the Partner is an essential condition for any business relationship with Arkopharma to develop fair and transparent business practices.

II. Scope of application

The provisions of this Code are applicable to suppliers, service providers, customers, healthcare professionals, agents, intermediaries, and, more generally, to any partner having a business relationship with Arkopharma ("**Partner(s)**").

All Partners must comply with all the provisions of the Code, which does not replace the laws and regulations in force, but is intended to guide them on the rules and ethical practices to follow in their business relations with Arkopharma. If there is any difference between the provisions of this Code and the laws and regulations of the countries in which Arkopharma operates, the most restrictive principles shall apply.

III. Principles

• RESPECT FOR THE INDIVIDUAL

◦ No use of child labor

The Partner's employees shall not be younger than the minimum legal working age in the relevant country or the age at which compulsory schooling ceases in that country. The employment of children under the age of 15 is strictly prohibited in any case. Minors may not be employed for dangerous work or work that might endanger their physical or moral identity.

◦ No forced labor

The Partner must ensure that any work is voluntary and that it is not carried out under any force or threat, whether mental, physical or verbal. Any restriction on the freedom of movement or any retention of personal documents is strictly forbidden.

◦ Remuneration, working time & working hours

The Partner must comply with all applicable local laws relating to the statutory minimum wage, working hours, overtime and weekly rest periods for employees. The Partner must comply with local legal and industrial standards. The Partner must give its employees the right to the annual paid leave, the social security benefits and cover and the public holidays that are given under domestic law.

◦ Right to organise

The Partner agrees to comply with applicable laws regarding collective bargaining and the freedom of association.

◦ Non-discrimination

The Partners are required to ensure that there is no form of discrimination in recruitment, hiring, remuneration, training, working conditions, assignment, discipline, promotion/advancement, termination of employment, on the basis of age, origin, belonging or not to a specific ethnic group, nation, race or religion, generic characteristics, gender, identity or sexual orientation, state of health, pregnancy, disability, family situation, surname, trade union activities, morals, political opinions or place of residence.

Certain differences in treatment may still be allowed if based on competency, experience or relevant objective criteria and if they meet an essential and determining professional need, where the objective is legitimate and the requirement is proportionate.

◦ No harassment

Arkopharma agrees to prevent and to punish severely any violation of human dignity. Employees must not be subject to any physical disciplinary measures, any mental or physical coercion, any insulting behaviour or any moral or sexual harassment.

- **Work environnement**

The Partner shall provide safe working conditions for its employees. At a minimum, the Partner shall provide adequate drinking water, lighting, ambient temperature, ventilation, sanitation, and personal protective equipment, as well as properly equipped workstations. The facilities must also be constructed and maintained in accordance with the standards set forth in applicable laws and regulations.

- **Health & Safety**

Arkopharma requires its Partner to make the health and safety of their employees a priority in all aspects of their operations. At a minimum, the Partner must comply with all applicable health and safety laws, regulations, and standards.

- **Environmental Sustainability**

Arkopharma requires its Partner to comply with all applicable environmental laws and regulations and to demonstrate continuous improvement in its environmental performance.

- **COMBATTING UNLAWFULL PAYMENTS, BRIBERY, CORRUPTION AND INFLUENCE PEDDLING**

Arkopharma does not tolerate any form of bribery, corruption, whether active or passive, direct or indirect, or influence peddling, and is firmly committed to combating such practices. Arkopharma expects its Partners to make the same commitment to themselves and to their own partners and to adopt behavior and ethical standards that promote integrity, loyalty, and transparency.

The Partner must comply with national and international laws, principles, standards, and regulations in the fight against corruption. As such, it **shall refrain from accepting or offering, directly or indirectly, any undue advantage** during its duties, in particular in the form of illicit payments of money, and/or the provision of unauthorized gifts, services or benefits.

With this objective of fighting corruption, Arkopharma strictly controls the giving and receiving of gifts, business meals, invitations, and business trips in its *Gifts & Invitations Policy*. In addition, **Arkopharma is particularly vigilant about compliance with the rules governing its relationships with healthcare professionals and organizations**. 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. In addition, the offer or acceptance of such benefits is prohibited in certain circumstances such as tenders or contract negotiations/renewals. In any event, they must be made transparent and free from any illegitimate or illicit influence on the person who made them. Failure to comply with these provisions by a Partner may result in its exclusion from a tender or the termination of its contract.

- **PREVENTION OF CONFLICTS OF INTEREST**

Arkopharma expects its employees to act in an objective, impartial and fair manner at all times, and that they give priority to the interest of Arkopharma over their personal interests in the conduct of their business relationship or their working relationships in general. A conflict of interest arises where an employee is confronted with a situation whereby his or her personal interests or those of persons close to him or her (family members or friends) conflict or compete with the interests of Arkopharma.

Arkopharma's employees and the Partner are required to ensure that they do not use their professional position to obtain direct or indirect personal benefits. In addition, they agree not to offer or provide the other with gifts or benefits that exceed the acceptable limits set by Arkopharma

- **PERSONNAL DATA & PRIVACY**

- **Personal data and privacy**

The Partner undertakes to comply with the applicable laws and regulations regarding the protection of personal data and the respect of privacy.

- **Confidentiality & protection of sensitive information**

Arkopharma's sensitive information must be protected. Sensitive information is information that is not public. More specifically, any information which has a commercial or strategic value to Arkopharma and the disclosure of which could be detrimental, is confidential, whatever its form.

Partners must act with the greatest care when disclosing information, including within existing business relationships.

Arkopharma also keeps the sensitive information provided to it by Partners confidential. Arkopharma agrees to protect such information in the same way that it protects its own information and to use it only for the needs for which such information was given to it.

- **PROTECTING ARKOPHARMA'S REPUTATION**

Protecting Arkopharma's image and reputation is a key issue for its development, and Arkopharma therefore requires each of its Partners to be conscious of its responsibility in this regard and to comply with the following principles. The Partner must ensure that it communicates in a responsible manner, irrespective of the media used (but especially when using social media), in order to avoid any damage to Arkopharma's image and reputation. Any remarks made publicly by the Partner must never be insulting, offensive, malicious, or disrespectful with respect to any person, and must not be political, religious, sexual or racist in nature.

- **FREE COMPETITION**

The Partner agrees to comply with applicable laws and regulations with respect to the freedom of competition, and to act fairly and honestly in its business dealings.

- **INTERNATIONAL TRADE, COMPLIANCE WITH EMBARGOES AND EXPORT RESTRICTIONS**

Arkopharma is committed to compliance with the laws, regulations, boycotts, embargos and other forms of trade restrictions imposed inter alia by the United Nations, the European Union and the United States, with which all Partners have a duty to comply.

- **SYSTEM FOR COLLECTING AND PROCESSING REPORTS - COMPLIANCE INCIDENTS**

Arkopharma provides its employees and Partners with a mechanism for reporting, **without** direct **financial compensation** and in **good faith, behavior or situations that are contrary to the Code, crimes or misdemeanors**, violations or attempts to conceal violations of laws/regulations/ European Union law or any international commitment ratified by France, or threats or harm to the public interest. The reporting channels are as follows:

- Secure web platform: <https://arkopharma.signalement.net>
- phone line with voice server (France only): 01 86 47 67 97 (organization code: 1980)

Reports are handled **securely** and **confidentially** by internal or external referents appointed by the Alert Committee, which decides collectively on the action to be taken on a report considering the case and the information provided.

The scope and operating procedures of this system are specified in the dedicated procedure, available on the Arkopharma website <https://fr.arkopharma.com> or on request.

IV. Control of the compliance with the Code & breach of the code

To ensure compliance with this Code, Arkopharma may require Partners to demonstrate that they are taking (i) all necessary steps to ensure compliance within their organization and (ii) reasonable steps to ensure that their own business partners comply with this Policy. Arkopharma may also use specially commissioned, independent external service providers for this purpose.

Within the framework of these controls, the Partner undertakes to cooperate and to provide any information and/or documents legitimately requested. The Partner undertakes to implement any necessary corrective measures found as a result of the checks within the specified time limits.

ARKOPHARMA may decide to immediately terminate the commercial relationship it has 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 measures to resolve the non-compliance brought to its attention within a reasonable period.