

Business Partner Code of Conduct

2024



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1. About Us

Antibiotice S.A. is one of the most important generic medicine manufacturers in Romania, with a tradition spanning seven decades. The company provides patients with a diverse range of pharmaceutical products, including prescription and over-the-counter (OTC) medicines, dietary supplements, dermo-cosmetic products, and medical devices. Through our commitment to quality and accessibility, we aim to improve the health and quality of life for people in Romania and around the world.

With an active global presence, Antibiotice S.A. exports pharmaceutical products while staying true to its mission of producing safe, effective, and affordable medicines. Our performance over time has been supported by strong partnerships with suppliers, customers, and regulatory authorities in the markets we operate.

Our commitment to research and development, combined with adherence to sustainability principles, enables us to contribute to the development of the communities where we operate. Our core values – efficiency, collaboration, and responsibility – guide us in building long-term and trustworthy relationships with our partners.

1.1 Mission, Vision, Values

Mission

The mission of Antibiotice S.A. is to provide high-quality, affordable generic medicines, contributing to the health and well-being of patients. We are guided by fundamental values such as fairness, social responsibility, and sustainability, which define our relationships with patients, employees, partners, and communities.

These principles drive us to ask our partners to uphold similar standards, working together to develop an ethical and sustainable pharmaceutical sector.

Vision

We focus on humanity and rightfulness and are constantly concerned with updating our operations as well as our products. We believe that the value of a medicine does not consist in its price, but in its affordability and the positive impact on people's lives.

We permanently aim at meeting the expectations of our customers, clients, business partners, shareholders, the community and last, but not least, our employees. In order to do so, we reaffirm our commitment on adopting an honest conduct towards all our stakeholders.

Moreover, our company has taken significant steps in terms of sustainability, effectively harmonizing its business objectives with the principles of sustainable development in all our operations.

Our purpose is to improve our economic performance while aligning to the sustainable development objectives, thus maintaining our reputation as a trustworthy, ethical and transparent partner. We have committed to minimize the potential negative impact our activity may have on the components of the natural assets and, at the same time, to increase the positive effect on the communities, employees and local economy.

Values

We cherish efficiency, expertise and the spirit of cooperation, which allow us to remain focused on the ever-changing needs of our consumers and customers. In our company, we make certain that our people are strategically employed, matching their competencies with the opportunities.

We mutually acknowledge our purpose and value within the company, which creates a sense of connection and gives us the strength to overcome limitations and obstacles. As human beings we care for those around us, we do our best to maintain connectivity and continually try to improve the things people find most important.

1.2 Priority Topics

Antibiotice S.A. recognizes the importance of reducing negative impacts on the environment and society while amplifying positive contributions. Therefore, our Code of Conduct emphasizes priority topics essential for our relationships with partners: responsible resource management (water, energy, waste), reducing greenhouse gas emissions, promoting diversity, respecting human rights, and ensuring the health and safety of all stakeholders.

These priority topics guide our activities and will be used to evaluate our partners' performance, ensuring alignment with our values.

2. Purpose of the Partner Code of Conduct

The Antibiotice S.A. Partner Code of Conduct establishes:

- Ethical and social standards that our partners must uphold.
- Our expectations regarding quality, safety, and compliance across the value chain.
- The importance of building relationships based on trust, transparency, and sustainability.

This Code applies to all suppliers and intermediaries, reflecting our commitment to responsible business practices. In selecting business partners, our company considers these principles and monitors adherence to them.

2.1 Reference Documents

The Code is based on relevant internal documents and international regulations, including the Universal Declaration of Human Rights and ISO standards (9001, 14001, 45001). These provide a framework for implementing sustainable and ethical practices that we expect all our partners to follow.

2.2 Compliance with the Code

The provisions of the Partner Code of Conduct must be respected by all suppliers, business partners, and other entities collaborating with the company (hereafter referred to as “partners”).

By adhering strictly to this Code, Antibiotice S.A. and its partners demonstrate dedication and accountability to ethical and environmentally friendly business practices, contributing to building sustainable, trust-based relationships within and beyond the pharmaceutical industry.

Antibiotice S.A. reserves the right to evaluate its partners based on their compliance, performance, and achievement of the objectives described in this Code.

2.3 Sanctions and Corrective Actions

The Partner Code of Conduct is an integral part of the general conditions for selecting suppliers and partners. We expect our partners to strictly adhere to the principles outlined in this Code, and any deviations may result in sanctions. Sanctions may include warnings, suspension of the partnership/business relationship, or termination of contractual agreements, depending on the severity of the violation.

Additionally, Antibiotice S.A. emphasizes the importance of corrective actions, encouraging partners to promptly address and rectify any violations of the Code. This may involve implementing new policies or procedures to prevent future violations and actively cooperating with Antibiotice S.A. during any investigations or audits. By applying sanctions and promoting corrective actions, Antibiotice S.A. reinforces its commitment to ethical conduct and maintains the integrity of its partnerships, fostering a culture of accountability among its stakeholders.

2.4 Questions and Suggestions

If any deviations from the Partner Code of Conduct are identified, we strongly encourage individuals involved to report such situations using dedicated communication channels etica.integritate@antibiotice.ro. All observations or concerns regarding violations of the Code are treated seriously and confidentially, ensuring protection and support for those who choose to report such situations.

Additionally, the [Antibiotice S.A. website](#) provides further information and contact details that can be used to ask questions and/or report ethical concerns.

3. Working Conditions and Human Rights

We require our partners to treat employees with dignity, respect, and fairness. Antibiotice S.A. expects partners to comply with all applicable legal requirements and regulations regarding fair treatment of employees.

3.1 Human Resources Practices

Human resources practices are a fundamental component of ethical business conduct. We expect all our partners to uphold principles of fair labor practices and respect for human rights. These include transparent recruitment processes, equal opportunities for employee training and professional development, employee performance evaluation procedures, and ensuring a safe, healthy workplace free from forced or child labor.

Furthermore, partners are expected to comply with applicable labor laws and regulations, including those related to wages, working hours, and employee benefits.

Partners are encouraged to establish clear policies and procedures for resolving employee grievances, conflicts, and disciplinary actions, promoting transparency and accountability throughout their organizations.

Antibiotice S.A. Objective: Respect for human rights, demonstrated by the absence of publicly reported or audit-detected cases of abuse.

3.2 Freedom of Association and Collective Bargaining

Antibiotice S.A. recognizes freedom of association and collective bargaining as fundamental rights. We require our partners to respect and support their employees' rights to freely associate, organize, and engage in collective bargaining without fear of retaliation or discrimination.

This includes recognizing and respecting employees' rights to join or form unions, engage in collective negotiations, and participate in other lawful forms of association. Partners are obligated to comply with all applicable labor laws and regulations, including those governing freedom of association and collective bargaining.

Antibiotice S.A. encourages partners to establish constructive and transparent communication channels with employee representatives or unions to address workplace concerns, negotiate fair employment terms, and resolve disputes promptly and respectfully.

Antibiotice S.A. Objective: 100% compliance with the principle of freedom of association and collective bargaining among partners.

3.3 Diversity and Equal Opportunity

The principle of diversity and equal opportunity is integral to promoting an inclusive and fair work environment. We expect our partners to support and promote diversity in all its forms, including but not limited to race, gender, age, ethnicity, religion, sexual orientation, disability, and socio-economic background.

This entails fostering and maintaining a workplace culture that respects and values the unique perspectives and contributions of every individual. Partners are encouraged to implement policies and practices that prohibit discrimination, harassment, and retaliation and to offer fair and equal opportunities to all employees.

Antibiotice S.A. expects partners to actively promote diversity and inclusion within their organizations.

Antibiotice S.A. Objective: Zero confirmed cases of discrimination or harassment among partners' employees.

4. Ethical Business Conduct

Partners must adopt ethical business practices and comply with all applicable legal requirements.

4.1 Anti-Corruption and Bribery

Antibiotice S.A. applies a zero-tolerance policy for corruption. Partners must avoid any form of bribery, fraud, or influence peddling and report any suspicious cases promptly.

Partners are unequivocally required to refrain from all forms of corruption, bribery, fraud, or influence peddling in their interactions with Antibiotice S.A. or any other entity. Antibiotice S.A. expects its partners to strictly adhere to all national and international anti-corruption laws and to uphold the highest standards of integrity and transparency in all business dealings.

Partners must not offer, solicit, or accept bribes, kickbacks, or any other undue advantages, either directly or indirectly, and must immediately report any suspected or actual corruption cases to Antibiotice S.A.'s compliance representatives.

Antibiotice S.A. Objective: Zero confirmed cases of corruption, bribery, or fraud among partners.

4.2 Conflict of Interest

Antibiotice S.A. rigorously manages conflicts of interest to maintain the highest standards of integrity and transparency in all business relationships.

Partners must identify and disclose any actual or potential conflicts of interest that may compromise the integrity of business relationships. Partners are obligated to promptly report any conflicts of interest to Antibiotice S.A.'s compliance representatives and take appropriate measures to mitigate or avoid such conflicts.

Antibiotice S.A. Objective: Zero confirmed cases of conflicts of interest among pre-selected partners.

4.3 Gifts and Invitations

Gifts and invitations must never be offered or accepted if they could influence or be perceived as influencing business decisions or compromise the independence or impartiality of either party.

Transparency and accountability are essential, and partners are required to immediately disclose any gifts or invitations to Antibiotice S.A.'s compliance representatives.

4.4 Personal Data Protection

Partners must handle personal data with utmost care, respecting individuals' rights to privacy and confidentiality. Partners are required to comply with GDPR legislation and implement measures to safeguard personal data, including promptly reporting any security incidents.

Antibiotice S.A. expects partners to rigorously adhere to all applicable laws and regulations concerning data protection, including the European Union's General Data Protection Regulation (GDPR) and other relevant national or regional legislation.

Partners must ensure that personal data is collected, processed, and stored securely, solely for lawful and legitimate purposes, and with the explicit consent of individuals whenever required. Antibiotice S.A. requires partners to implement robust data protection measures to prevent unauthorized access, disclosure, or misuse of personal data.

Antibiotice S.A. Objective: 100% compliance with data protection regulations.

4.5 Fair Competition

Partners are unequivocally prohibited from engaging in any form of anti-competitive behavior, including but not limited to price-fixing, bid-rigging, market allocation, or collusion with competitors.

Antibiotice S.A. expects partners to compete fairly and ethically in all business activities, strictly adhering to antitrust laws governing market competition. Partners must refrain from actions that could distort or undermine free and open competition, ensuring fair competition conditions for all market participants.

Antibiotice S.A. emphasizes the importance of fostering a competitive environment based on innovation, quality, and customer satisfaction, and partners are encouraged to collaborate with Antibiotice S.A. in promoting a culture of fair competition and compliance with antitrust laws.

Antibiotice S.A. Objective: Zero confirmed cases of anti-competitive practices among partners.

5. Protection of the Natural Environment

Our partners must commit to conserving natural resources, optimizing operational consumption, and reducing greenhouse gas emissions.

5.1 Packaging and Waste Management

We expect our partners to reduce the use of virgin raw materials, utilize recycled and recyclable materials, and apply circular economy principles. Additionally, they must comply with all relevant laws, regulations, and standards regarding natural resources, packaging materials, and waste disposal. This includes minimizing the environmental impact of packaging by prioritizing recycled or biodegradable materials and reducing excess packaging. Partners must also implement effective waste management strategies to minimize waste generation, promote circular economy principles, and avoid landfill disposal. Furthermore, partners are required to have systems in place to measure the quantities of materials used and waste generated at their facilities.

Antibiotice SA expects partners to actively collaborate in efforts to reduce environmental pollution (air, water, soil) and conserve natural resources by adopting sustainable packaging and waste management practices in their operations.

Antibiotice SA Objective: Increase the rate of recycled raw materials used in the manufacturing of products and services supplied to Antibiotice SA and reduce the volume of waste sent to landfills in strategic partners' operations.

5.2 Water Management

We expect our partners to responsibly manage water resources, prioritize water conservation efforts, and reduce water consumption in their operations. This includes implementing efficient technologies, processes, and practices for water extraction and usage to lower consumption, as well as managing and treating wastewater appropriately to prevent pollution and minimize environmental impact.

Antibiotice SA Objective: Increase the rate of recycled water usage and reduce water consumption in strategic partners' operations.

5.3 Energy Consumption

We expect our partners to actively pursue initiatives aimed at minimizing energy consumption, improving energy efficiency in their operations, and increasing the use of renewable energy sources.

Antibiotice SA Objective: Reduce energy consumption from fossil fuels and increase energy consumption from renewable sources in strategic partners' operations.

5.4 Greenhouse Gas Emissions

We expect our partners to reduce greenhouse gas emissions generated by their activities and business relationships. Partners are encouraged to set emissions reduction targets, track their progress transparently, and invest in solutions to minimize their environmental impact.

Partners must also have systems in place to measure and monitor the amounts of greenhouse gas emissions generated at their facilities.

Antibiotice SA Objective: Reduction of Scope 1, 2, and 3 emissions at partners' levels.

6. Product Quality and Safety

We require our partners to fully comply with the standards and regulations governing the manufacturing, handling, and distribution of products associated with Antibiotice SA.

6.1 Consumer and Patient Health and Safety

Partners must adhere to GMP and GLP standards throughout the supply chain, ensuring quality products. All documents or data associated with these activities, including GMP documentation, must be original, accurate, legible, and securely stored to prevent any form of tampering or loss.

Antibiotic SA Objective: Reduce the number of product quality complaints and cases of products recalled or withdrawn from the market at partners' levels.

6.2 Clinical Studies

We require partners involved in clinical studies on behalf of Antibiotic SA to comply fully with relevant regulations in the countries where studies are conducted and in the regions where Antibiotic products are marketed, registered, and distributed. It is imperative for partners to strictly adhere to relevant guidelines for good clinical practices (GCP) established by both national and local regulatory authorities.

6.3 Animal Welfare

Partners must adhere to strict standards and regulations regarding animal welfare in all research, testing, and production processes related to pharmaceutical products. They must comply with all applicable laws, regulations, and industry guidelines governing the ethical use of animals in research and testing processes. Antibiotic SA encourages the adoption of alternative methods such as in vitro testing and computer modeling to reduce and replace animal testing while ensuring the safety and efficacy of pharmaceutical products.

Objective for Partners Preselected by Antibiotic SA: Reduce the number of animals used in research and testing processes at partners' levels.

6.4 Promotional and Marketing Practices

Promotional and marketing materials and activities by our partners must adhere to strict ethical, medical, and scientific criteria, as well as all relevant laws and regulations. In interactions with healthcare professionals, patients, or veterinarians, all partners are required to respect industry conduct standards relevant to their field, such as those of the European Federation of Pharmaceutical Industries and Associations (EFPIA) and the International Federation of Pharmaceutical Manufacturers & Associations (IFPMA).

Antibiotic SA Objective: 100% compliant promotional materials and zero cases of greenwashing.

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