



Declaration of Ethics

Preface – A message from the Management Board

At Transo-Pharm including its affiliates, we know that our employees, our partners and those who work on our behalf are very important in supporting our commitment to conducting business with the highest standards of ethical behavior and integrity.

To support employees, we have developed this guide that outlines our commitment to do business the right way. This guide outlines the minimum requirements we ask of our employees and must be met when they conduct business with us or on our behalf. Our goal is to achieve objectives with a friendly and open style.

We aim to build long-term partnerships with sustainable pharmaceutical products. The satisfaction of our business partners and pharmaceutical customers is our ultimate goal, since we see ourselves as your partner. In order to achieve this goal, we adjust to your requirements, so that we can flexibly adapt to your needs. In doing so, we can put our expertise and market knowledge of active pharmaceutical ingredients to work for you in a targeted manner. Enjoying work, diversity and individuality are equally important to us. In a partnership, we value fair cooperation.

Our reputation, integrity and this corporate commitment is a key factor in our success. Our ethical business standards must be consistently upheld. This is a priority at Transo-Pharm and its affiliates.

This statement represents who we are as a company and the high standards we follow. It enables us to fulfil our commitments to our stakeholders, including our employees, customers, suppliers, business partners, authorities and ourselves. Our shared commitment to our stakeholders must be accompanied by a shared commitment to act in accordance with all applicable laws. To avoid a conflict between our personal interests and those of the company, we are proactive in disclosing and addressing conflicts before they interfere, or appear to interfere, with the company's interests.

When a particular activity is not addressed in this guide, Transo-Pharm employees are encouraged to be guided by common sense and integrity and to act pragmatically.

If any questions arise beyond this, please contact ethics@transopharm.de

We would like to express our sincere thanks to all those who ensure that we can continue to implement these values in the same way and help us to maintain the highest ethical standards in everything we do.

Justus Dehio

Managing Director

Frank Krause

Managing Director



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1. Transo-Pharm' s Employees

The following business standards apply to all of our internal Transo-Pharm employees.

Transo-Pharm always expects its employees to act responsibly and ethically in the company's operations. This policy and associated guidelines and group instructions provide information and guidance on how employees should act with regard to business ethics issues.

If necessary, appropriate actions have to be coordinated with own business partners to comply with the following requirements.

Transo-Pharm employees are required to adhere to the following:

Please follow the rules

Know and comply with the laws, regulations and company policies that are applicable when conducting business with and on behalf of Transo-Pharm. Applicable laws, regulations and other relevant national and international rules shall always be complied with and given precedence if they are stricter than or conflict with the content of Transo-Pharm' s internal documents.

Personal judgement

Always conduct business with honesty and integrity and in a manner to protect Transo-Pharm' s reputation.

Ask questions

If you are not sure what laws, regulations or policies are that apply when conducting business, speak with your management or other senior management personnel.

Express concerns

Promptly express your concerns about possible violations of this guide. If a concern is not resolved to your satisfaction, escalate to another resource.



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2. Policy on Business Ethics

Transo-Pharm Handels-GmbH is a certified distributor of pharmaceutical ingredients. This policy and associated guidelines apply to all companies within the Transo-Pharm Group.

Anti-corruption

Transo-Pharm does not tolerate any form of corruption. Employees may not give, promise, offer, request or receive compensation or benefits.

Transo-Pharm and our suppliers will strive to eradicate any form of violation of competition, anti-trust and anti-corruption laws.

Transo-Pharm and our suppliers accept that gifts and hospitality of negligible value are only permissible within the bounds imposed by normal business customs and in cases in which they do not breach the laws of respective country.

There may be a risk of corruption when other people or companies act on Transo-Pharm's behalf. Employees must therefore carry out special checks and take precautions before and during cooperation with agents, representatives and other intermediaries.

Competition

Employees may not be party to any form of agreements, contacts or actions that aim at or result in preventing, restricting or distorting competition. Employees must manage contact with competitors with care and in a way that ensures compliance with competition regulations.

Marketing

Employees must present Transo-Pharm's products and services in a way that is accurate and fair. All marketing should be designed responsibly and be carried out in accordance with applicable rules, good marketing practice and requirements under other legislation, such as rules on data protection.

Conflicts of interest

Employees must avoid contexts in which their own interests or those of relatives or friends may risk conflicting with what is best for Transo-Pharm. Private interests and external activities must not affect, or be considered to affect, the judgement or actions of employees when carrying out their work for Transo-Pharm.

When the risk of a conflict of interest arises, the immediate supervisor must be informed and is responsible for taking appropriate action. If there is a conflict of interest, the employee in question may not make decisions in the matter on Transo-Pharm's behalf.



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Handling information

Information about Transo-Pharm's operations must always be handled with sound judgement and caution.

Information that is business-critical, valuable or sensitive for Transo-Pharm must be regarded as confidential and be kept classified. A non-disclosure agreement must be entered into when exchanging information with an external party. Information within research and development is often confidential and, in some cases, patent protection can be attained.

Processing of personal data

Transo-Pharm's processing of personal data shall be conducted with the protection of the personal integrity taken into consideration and in accordance with applicable legislation. The processing may only be conducted if there is a clearly stated purpose and legal basis for the processing.

Transo-Pharm shall ensure that appropriate technical and organizational security measures are taken when personal data is being processed, that personal data are erased and that information regarding the processing is provided by the company to the data subjects.

Tax and money laundering

Transo-Pharm must comply with applicable laws and regulations regarding tax and anti-money laundering measures. Employees must not accept, support or facilitate any breach of regulations regarding taxation and money laundering.

Circumstances that should be regarded as suspect include if the counterparty proposes that payments should be made in cash or using an unusual currency, if the proposal for a business deal appears unjustified or overly complex, or if a desire is expressed to involve countries that have no connection with the transaction. A special investigation must be conducted in all cases where the counterparty is reluctant to submit complete information.

International sanctions

Sanctions can restrict freedom of action for a state or some of its citizens. The sanctions may take the form of restrictions with regard to trading, financial transactions and travel. Strategic Purchasing are responsible for ensuring compliance with any international sanctions that are in place.

Regular checks must be made against Transo-Pharm's customer and supplier registers to ensure that sanctions are followed. Checks regarding current sanctions will be included in the check list prior to entering into agreements with new customers and suppliers.



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3. Policy on Human Rights & Working Conditions

Protecting human rights and fundamental freedoms is one of our first priority. This policy confirms our commitment to respect the fundamental rights and freedoms in accordance with Article 1 of German Basic law in which Germany acknowledges “inviolable and inalienable human rights. Our support for these national, European fundamental principles and ILO Declaration on Fundamental Principles and Rights at Work is reflected in our policies and practices regarding employees, suppliers, customers and the areas in which we operate.

Transo-Pharm does not tolerate any infringements.

Our Employees

We believe that our employees should be treated with respect and dignity and work in an environment that is free from harassment and unlawful discrimination.

- We will not employ workers under the legal minimum age for work.
- We will not make use of any forced labor or debt-bondage labor.
- We will not discriminate against any person based on their protected characteristics. Any form of discrimination on the basis of descent, origin, nationality, skin color, gender, religion, ideology, membership of employees’ associations, political opinion, sexual orientation, age, marital status, pregnancy, disability, illness or any other personal characteristics must be avoided.
- All employees must be treated equally and enjoy equal opportunities during the selection process and throughout the entire employment relationship.
- Working time directives will be adhered to as per the Working Time Regulations of German labor law. Laws that are required to be posted are publicly available to employees and can be viewed on our intranet, too.
- Wages paid for standard working hours will meet or exceed national minimum wage or living wage levels as appropriate.
- All employees should be able to work in an environment that is free from discrimination, victimization, harassment, bullying and that all employees should be treated fairly and with dignity.

Child labor

Transo-Pharm strictly rejects all forms of child labor. The use of child labor by suppliers is therefore strongly forbidden. The definition of child labor is based on the globally recognized standards of the ILO. The minimum age for taking up employment is 15 years.

In principle, employment must not be taken up before the end of statutory compulsory education. If employment is taken up before the age of 18, certain requirements for protecting the young worker have to be met. These are based on local, national and international standards.



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4. Human Working Conditions

The dignity, privacy and personal rights of employees must always be respected. Physical, psychological, sexual or verbal harassment as well as punishments, assaults, abuse or intimidating behavior are forbidden. Disciplinary measures are permitted only within the context of statutory provisions or the provisions that are set out by Transo-Pharm and must be proportionate to the incident in all cases.

Labor Rights

All employees working for Transo-Pharm and their suppliers must be free to choose the ways and means of the employment they pursue and to terminate it subject to statutory and thus appropriate notice periods.

Suppliers are urged not to employ forced laborers, serfs, slaves, prisoners or other dependent employees under any circumstances and thus to oppose any form of modern slavery. Employees must be given the right to leave their workplace and to terminate the employment relationship subject to statutory notice periods. Workers must be permitted to move freely at all times. Employers are not permitted to retain a deposit or identity documents or similar. If third parties are used for recruitment purposes, the supplier is responsible for verifying whether statutory requirements and those that are set out by Transo-Pharm are complied with.

Any costs that arise through the commissioning of third parties must not be passed on to the employee under any circumstances.

Our Suppliers

All suppliers are expected to comply with internationally recognized human rights with regard to all business activities within their own sphere of influence.

- We strive to promote adherence to Human Rights principles detailed above throughout our supply chain.
- We see our relationships with our suppliers as an opportunity to share best practice and through open communication, to promote mutual, continual learning and improvement with respect to human rights.

Our Customers

- We are continually working to build and maintain relationships with organizations that share our commitment to upholding and implementing the fundamental principles of Human Rights and strive to promote best practice within our sphere of influence.
- We openly welcome inspection and auditing processes to ensure we continue to develop a robust and transparent Human Rights Policy.



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5. Health & Safety (EHS) Policy

Effective management of the workplace is one of our corporate priorities. We reaffirm this commitment and pledge to continue our efforts to protect the environment and ensure the health and safety of our employees, business partners, visitors and the community.

Transo-Pharm takes appropriate precautionary measures against accidents and occupational illnesses in order to guarantee the health and safety of its employees in the course of their working activity.

- We are committed to continuously improving our environmental, health and safety performance.
- We provide a safe and healthy work environment and ensure that our employees are properly trained, informed and motivated to act safely and with respect for the environment.
- We carefully assess the influences and effects of our actions, considering human health and the environment.

Transo-Pharm ensure that systems for identifying, assessing, avoiding and combating potential risks to the health and safety of employees are in place. National laws and specifications must be complied with.

Compliance

- We ensure compliance with all legal and other requirements to which we are subject.
- By complying with all local, state and federal EHS laws and regulations, and other requirements to which the company is committed and will do in future.

Management

Our Management and executive leadership are responsible for compliance, adherence to company requirements, and implementation of this declaration.

Our Employees

- We provide specific EHS training to our employees on EHS aspects and hazards of their respective work tasks. In addition, we encourage the active participation of employees in the continuous identification of opportunities for improvement.
- We provide the resources needed to implement our strategies, training and programs that add value and improve awareness across the organization.



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6. Environmental Policy

Environment

Transo-Pharm asks its suppliers to work continuously on reducing the environmental impacts that are caused by their respective business activities. At least the environmental protection laws and provisions in the country of production must be complied with.

Natural resources must be protected as sustainably and efficiently as possible. In doing so, protecting people and the environment is paramount.

Waste Management

Transo-Pharm tries to minimize waste continuously and to dispose of the resulting waste according to local statutory requirements.

Suppliers are expected to consider strategies for avoiding or reducing waste and for recycling. Depending on the supplier's location and specific production processes, in addition to the environmental aspects that are listed above, national or local provisions may apply to air emissions, land use management, protection of biodiversity, noise, odor emissions and other environmental aspects.