

# Supplier Code of Conduct

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01

Introduction



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# Our Principles: Supplier Code of Conduct

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An important part of our culture is recognizing that doing business with integrity is a shared responsibility of everyone. Focusing on quality and integrity have helped make Hikma the success it is today. We expect our suppliers, partners and other parties with whom we do business to apply the same standards, to comply with all laws and regulations that apply to them or their operations, and to behave ethically across all business aspects.

We have a duty to act responsibly: for our people, our patients, communities, and the environment. That is why we have identified four focus areas where we can drive positive impact.



We have outlined our principles in this Supplier Code of Conduct (the “**Code**”) that will benefit our partnerships, communities and the environments we operate in. This Code applies to our suppliers, partners and third parties providing goods and services to or working with Hikma (“**Suppliers**”). Should any concerns arise, reports can be made to our Hikma Speak Up Line online at <https://www.hikma.ethicspoint.com>

We also look to collaborate and work closely with our Suppliers to improve the overall sustainability level of our supply chain and identify any areas of risk.

By following the principles in this Code, together, we can maintain the trust of our customers and ultimately the patients whom we serve.

# Our Culture and Values

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At Hikma, we foster a culture of individual and collective progress, where employees and teams are united by a shared sense of purpose, belonging, and a collective desire to put better health within reach every day for the millions of people who rely on our medicines.

We have three core values that distinguish us: Innovate, Care, and Collaborate. These values guide our behaviours and help foster an environment where everyone is appreciated and can do their best work.



We  
Innovate

## **We keep learning**

by taking calculated risks and learning from mistakes

## **We inspire others**

and seek inspiration from inside and outside the organisation

## **We find a better way**

if it works, make it better; if it doesn't, re-invent it



We  
Care

## **We make a difference**

by helping others to be successful

## **We do the right thing**

by being aware of how actions impact others, especially our colleagues, our business partners, and the patients who take our medicines

## **We respect others**

by trusting their expertise and intentions



We  
Collaborate

## **We keep it simple**

by challenging convention and complexity, and by making sure we are part of the solution

## **We work together with others**

by putting aside personal agendas to achieve goals that matter to Hikma

## **We take ownership**

for getting things done, and always keeping our promises

02

Ethics



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# Adherence to Applicable Laws, Regulations and the Supplier Code of Conduct

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Hikma requires its Suppliers to comply fully with the laws, rules, regulations, ordinances and ethical standards applicable to their business operations, as well as this Code.

Suppliers are required to share our commitment and philosophy of respect by:

- Recognizing individual rights through compliance with all applicable employment laws and regulations
- Protecting the workplace and environment through compliance with all applicable health, safety and environmental laws and regulations
- Recognizing the importance of diversity by adherence to all applicable equal opportunity laws and regulations
- Adhering to all applicable laws and regulations pertaining to discrimination and ensuring that the workplace is free from violations of the law
- Ensuring that their personnel and representatives providing services to, or working with, Hikma are not debarred or suspended by any competent governmental or regulatory authority

## Anti-Bribery and Anti-Corruption

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Hikma has a zero-tolerance policy for all and any forms of bribery and corruption regardless of local practices or customs, and requires all individuals and corporate bodies with whom it does business to apply these standards regardless of where they are located geographically.

In particular, Hikma is committed to ensuring it is in full compliance with the requirements of the United States Foreign Corrupt Practices Act, the United Kingdom Bribery Act of 2010, the Canadian Corruption of Foreign Public Officials Act, and all other applicable anti-bribery and anti-corruption laws and regulations in place within the jurisdictions we operate in, as each may be amended from time to time.

Hikma expects its Suppliers to adhere to such laws and regulations, as they apply to them, and to be able to demonstrate compliance when requested. Suppliers and their employees, contractors, or agents are prohibited from, whether directly or indirectly, making, paying, offering to pay, promising, or authorizing the payment of money or anything of value to anyone, including but not limited to government officials, in order to influence, obtain, or retain approvals, licenses, or secure improper advantages or business. A Supplier must immediately notify Hikma if it learns that any such payment, offer, promise, or authorization has been made, whether directly or indirectly.

Suppliers must implement effective anti-bribery, fraud prevention, and reporting controls and must keep accurate and transparent records that reflect actual transactions and payments.

## Abolishing All Forms of Bribery and Corruption

Bribery, corruption, extortion, and embezzlement are all illegal. In business or government connections, or through the use of intermediaries, Suppliers must not pay or accept bribes or participate in other illicit inducements.

## Forms of Bribery

There are many forms of bribery, corruption, extortion, and embezzlement that are prohibited by law. Although this is not a complete list, the below are examples of unlawful practices intended to be covered under this Code:

- Accepting gifts, payments, or other favours in exchange for any favourable treatment. Please refer to **Gifts and Entertainment** below
- Giving unauthorised discounts, rebates, concessions, commissions or incentives, or bribes or other payments, to obtain or retain business
- Using one's position to influence decisions that affect oneself or any other person; performing official duties while being financially interested in the outcome
- Making facilitation payments to a foreign public official, government or administrative officer, political party, political or charitable organisation

## Gifts and Entertainment

At Hikma, we do not give or accept gifts (as per our Hikma Code of Conduct and our Procurement No-Gift Policy), including entertainment or hospitality, that could raise questions about our integrity or suggest an improper business advantage.

- No gifts of any kind, including cash or cash equivalents, are to be offered to Hikma employees
- When permissible, certain gifts, which are exceptions to the above, may be accepted such as:
  - Promotional items of minimal value provided at conferences, training events and trade shows offered equally to all members attending an event
  - Moderately priced meals in the interest of building positive business relationships

## Anti-Money Laundering

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Hikma does not tolerate any business transaction or activity that would directly or indirectly support criminal acts or violate anti-money laundering or terrorism financing laws. Hikma requires its Suppliers to comply with all such laws and regulations and to have adequate controls in place to prevent such illegal activities from occurring.

## Conflicts Of Interest

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Personal interests must not interfere or influence business decisions. Suppliers must disclose any actual or potential conflict of interest to Hikma. A conflict of interest exists when personal, social, financial, or civic interest could conflict, or appear to conflict with, the company's interests or compromise one's objectivity or independence with regard to the performance of their role.

## Fair Competition

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Hikma is committed to free and open competition in the marketplace in a legal and ethical manner and requires its Suppliers to strictly adhere to the laws, regulations, licensing and other requirements in the jurisdictions where we do business.

Hikma does not tolerate any business transaction or activity that violates the applicable antitrust and competition laws of any jurisdiction in which the company does business, including but not limited to, market allocation, bid rigging, price fixing, and the use of monopoly power to illegally foreclose competition. Our Suppliers must conduct their business in an ethical manner, consistent with fair and vigorous competition, and must comply with applicable antitrust and fair competition laws and regulations at all times.

## Prevention of Tax Evasion

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Hikma has a zero-tolerance policy for tax evasion and the facilitation of tax evasion. Suppliers and their associates act in compliance with all applicable laws relating to the prevention of tax evasion and the criminal facilitation of tax evasion including the United Kingdom Criminal Finances Act 2017 and must implement and maintain suitable measures and standards to prevent tax evasion and the criminal facilitation of tax evasion.

## Privacy, Data Protection and Security

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Hikma recognises that the correct and lawful treatment of data, including personal data, is critical for maintaining trust and ensuring that individuals feel confident that their right to privacy is respected. Hikma requires its Suppliers to comply with all applicable data protection laws, rules and regulations and implement appropriate safeguards and security measures to protect personal data.



# Confidentiality

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Suppliers must maintain the confidentiality of non-public and confidential information received from Hikma or other parties and must ensure that appropriate safeguards and security measures are in place to protect confidential information.

The following types of information are considered highly confidential and strong access controls must be enforced to ensure the information remains confidential at all times and that access is only provided for authorised business use:

- Scientific data, including designs, formulations, ingredients, samples, methods, samples, processes, and manuals
- Clinical trial information
- Business strategy and plans
- Contracts or contract details
- Commercial relationships
- Customer information
- Inventions, know-how, and discoveries
- Patents and patent applications, trade secrets, and, more generally, proprietary Hikma rights and data
- Proposed trademarks
- Proprietary documents
- Audit reports
- Non-public financial, sales, or marketing information
- Business and scientific reports
- Communications with regulatory and other governmental agencies
- Hikma's memoranda, correspondence and records
- Requests for Quotation or Proposal (RFQ or RFP)
- Names of suppliers
- Sourcing strategies or pricing policies
- Operating processes which are not in the public domain
- All personnel information, including, without limitation, names, addresses, home telephone numbers, payroll records, benefit plans and medical records

# Intellectual Property

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Hikma respects and maintains intellectual property rights and expects its Suppliers to uphold intellectual property rights and comply with all applicable laws and regulations that relate to intellectual property, including, without limitation, the protection of copyright, trademarks, developments, technology, know-how, and patents.

# Trade Restrictions and Economic Sanctions

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Hikma is committed to conducting its business in a legal and ethical manner and refuses to engage in prohibited trade practices or to do business with parties who are subject to recognised trade restrictions or economic sanctions, including but not limited to, those administered by the United Nations, the European Union, the United Kingdom, the United States of America, Canada, or other countries or official authorities.

Hikma requires Suppliers to comply, and to be able to demonstrate compliance when required, with all applicable trade sanctions and export control laws and regulations including, but not limited to, import, export, re-export, transfer or disclosure, trade restrictions, license requirements, boycotts, sanctions and other embargoes. This extends to any transaction in goods, technology, software, services, or technical assistance that may be subject to trade restrictions.

Suppliers must also conduct their operations in compliance with applicable trade and custom laws.

# Quality and Patient Safety

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Quality defines everything we do at Hikma, and we ensure this high standard is delivered consistently in all the communities we serve. We expect the same quality standards from our Suppliers, who have helped us build a global reputation in delivering high quality medicines to millions of patients.

We are responsible for protecting patient safety by ensuring products are manufactured, distributed, packaged, re-packaged, tested, re-tested, and handled in accordance with applicable quality standards. Suppliers must ensure compliance with applicable quality regulations and requirements for the markets in which the products are manufactured, registered or distributed, including Good Manufacturing Practices, Good Distribution Practices, and Good Laboratory Practices.

Any quality and adverse events must be reported as soon as possible, and in all cases within 24 hours of receipt, by contacting any of the following:

- Sending an email to [pv@hikma.com](mailto:pv@hikma.com)
- Submitting reports using the link on Hikma's website: <https://www.hikma.com/products/medicine-safety/>

Moreover, any relevant information regarding changes in quality and regulatory issues must be made transparent immediately to all relevant parties including Hikma.

## Animal Welfare

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We have a duty at Hikma to make sure animals are treated humanely, by embracing the "three Rs" of animal use (Reduction, Replacement and Refinement). Suppliers should seek opportunities to replace or avoid the use of animals in research by resorting to methods that reduce the need for animal testing such as literature and analytical methods, use methods that deliver comparable levels of information from fewer animals or to obtain more information from the same number of animals, and ensure the use of methods that alleviate or minimise potential pain, suffering, or distress, and, in cases where the use of animals in research cannot be avoided, enhance animal welfare. Alternatives to the use of animals should be used whenever scientifically valid and acceptable to regulators.

03

# Human Rights, Labour, Health and Safety

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## Non-Discrimination

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Suppliers must be committed to equal and fair employment opportunities and prohibit discrimination and harassment. Suppliers must comply with employment practices that respect human rights and must not discriminate on the basis of race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, marital status, or any other reasons prohibited by law in the jurisdictions they operate in.

## Child Labour and Anti-Slavery

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Hikma is committed to ensuring that “modern slavery” in the form of forced or compulsory labour, including child labour, and human trafficking does not take place in any of its businesses or supply chains across the globe.

Suppliers must comply, and must ensure their sub-contractors comply, with all applicable laws and regulations related to the prevention of modern slavery, including where relevant, the United Kingdom Modern Slavery Act 2015 and the California Transparency in Supply Chains Act 2010, as each may be amended from time to time. Suppliers must demonstrate that they have undertaken reasonable enquiry into, and are not aware of, any instances of modern slavery directly or indirectly linked to their business operations, products or services.

## Health, Safety, and Worker Protection

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Suppliers must provide their workers with a safe and secure working environment. Suppliers must also have adequate controls that ensure the protection of their workers from overexposure to chemical, biological, and physical hazards as well as physically demanding tasks in the workplace that violate applicable laws and regulations. Suppliers must comply with all health and safety laws, regulations, and standards that apply to them or to their operations.

04

# Sustainability



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# Promoting Environmental Sustainability

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At Hikma, we are committed to making our operations more energy efficient and environmentally responsible. We continue to make good progress in improving the way we monitor our impact and actively pursue projects to help reduce our carbon footprint.

We partnered with a global sustainability rating agency that conducts sustainability performance assessments. These assessments will help us understand our main Suppliers' sustainability performance and aim to set up a strong foundation to collaborate with our Supplier base on improving sustainability in our supply chain. Selected Suppliers are invited to partake in a sustainability assessment and share their scorecard with Hikma.

## Protecting the Environment

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Hikma strives to protect the natural environment and sees sustainable development as a key element of its role as a responsible business. We meet regulatory requirements and promote the sustainable and efficient use of natural resources and energy efficiency. We expect our Suppliers to do the same and apply similar standards.

## Emissions, Water and Waste

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Suppliers are encouraged to actively monitor and/or measure their emissions and waste generation to minimise potential environmental harm to their societies and communities in which they operate: this includes GHG emissions, water, and waste disposal.

Any emissions, water discharges and waste disposal that may cause harm to health or adversely impact the environment are expected to be appropriately managed before being released into the environment in accordance with local health authority requirements. Suppliers are also encouraged to collaborate with their partners, including Hikma, to develop new ways to reduce their emissions and help limit the impact of climate change.

05

Management  
Systems



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## Commitment and Competency

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Suppliers are expected to allocate appropriate resources to demonstrate their commitment to the requirements and principles set forth in this Code.

Suppliers are expected to ensure their personnel, own suppliers and others acting on their behalf understand the principles and commitments under this Code as well as applicable laws, regulations, and generally recognised standards.

## Risk Management

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Suppliers must allocate appropriate resources and have adequate mechanisms to determine and manage the risks inherent in the different areas covered under this Code.

## Documentation and Accurate Records

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Suppliers are expected to maintain accurate records and documentation necessary to demonstrate conformance with the standards and requirements under this Code as well as compliance with applicable laws, regulations, standards and guidelines. Hikma may require Suppliers to provide access to these documents. Records must be accurate, transparent and reflect actual transactions and payments. Supplier must not fail to record transactions and must not hide, unlawfully modify, or falsify data or information.

## Use of Hikma's Intellectual Property and Trademarks

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The use of Hikma's name, trademarks, intellectual property, or other similar information in supplier advertising, media publications, public communication, publications, work product, or product endorsement is prohibited without the prior written approval of Hikma.