

Supplier Code of Conduct

Par Health, Inc. and its affiliates and subsidiaries (collectively “Par Health”) are committed to the highest standards of ethical and social responsibility in all activities. We recognize that suppliers play a key role in the ongoing success and sustainability of Par Health.

Our Supplier Code of Conduct defines the principles and expectations for our suppliers. All suppliers working with or on behalf of Par Health are expected to share our commitment to operate in an ethical, social and environmentally responsible manner by abiding by the Pharmaceutical Supply Chain Initiative (PSCI) guidelines, which serve as the foundation for our Supplier Code of Conduct.

Par Health intends to evaluate suppliers’ fulfillment of the principles contained herein, and expects suppliers to cooperate, including remediating any identified issues. Par Health will collaborate with suppliers committed to improving conditions or identified issues, with the goal of managing risks and creating long-term, sustainable value.

By following these guidelines, we envision a supply chain that delivers commercial benefits to our customers and suppliers, while meeting our aspirations for sustainability and for creating a supply chain that is inclusive, resilient and transparent.

Business Ethics

Suppliers shall conduct their business ethically and act with integrity.

Our business ethics requirements include:

ANTI-BRIBERY AND CORRUPTION

All forms of bribery, corruption, extortion and embezzlement are prohibited. Suppliers shall not pay or accept bribes or participate in any other illegal inducements in business or government relationships, including through third parties or intermediaries. Suppliers shall have systems and processes in place to comply with all applicable anti-bribery laws, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Anti-Bribery Act.

ANTI-COUNTERFEITING

Suppliers shall work together with Par Health to ensure the integrity of our products and shall immediately notify us if they are offered the opportunity to purchase or otherwise become aware of any counterfeit, illegally diverted or stolen Par Health products.

FAIR COMPETITION

Suppliers shall conduct their business consistently with fair and vigorous competition and in compliance with all applicable anti-trust laws. Suppliers shall employ fair business practices including accurate and truthful advertising. Suppliers shall comply with prohibitions on insider trading and use of non-public information.

CONFLICTS OF INTEREST

Suppliers shall avoid conflicts of interest between their interests and their obligations to Par Health. Suppliers shall notify Par Health immediately, in writing, if an actual or potential conflict of interest arises.

Compliance Systems

Suppliers shall have compliance systems and processes in place to facilitate continuous improvement, business continuity and compliance with all the principles outlined here, including:

DATA PRIVACY AND SECURITY

Suppliers shall safeguard and make only proper use of confidential information to protect the privacy rights of the company, workers, patients, subjects (any person who participates as a subject in scientific and medical experimentation or product testing), and donors (any person who donates tissues, cells, organs and any other body parts for research purposes). Suppliers shall ensure technical and contractual controls protect the confidentiality and privacy of Par Health information processed by any supplier system leveraging artificial intelligence. Suppliers shall comply with applicable privacy and data protection laws. Any data privacy incident impacting or potentially impacting Par Health must be immediately reported to privacy@parhealth.com. Any data security incident impacting or potentially impacting Par Health must be immediately reported to cybersecurity@parhealth.com.

INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

Suppliers are expected to respect Par Health's proprietary information as well as confidential information to which it is exposed or otherwise provided access (inclusive of third-party confidential information of which Par Health has custody) and in all instances neither use nor disclose the same (a) without Par Health's express authorization or (b) for purposes other than those attendant to the performance they are contracted to render. Suppliers must have policies that enforce strict compliance with, and create affirmative obligations with respect to, the maintenance of confidentiality of such information. Further, Par Health prohibits the public disclosure or use of its name, logo, word marks, design marks, service marks, likeness, supplier relationships, products, parts, designs or any non-public information in any public form, including but not limited to, any press release, prospectus, offering memorandum, customer list, website, including, without limitation, product displays at any trade show or supplier facility, without Par Health's specific prior written authorization.

Compliance Systems

Suppliers shall have compliance systems and processes in place to facilitate continuous improvement, business continuity and compliance with all the principles outlined here, including:

Additionally, during the course of any engagement with Par Health, suppliers may receive certain other non-public, sensitive or proprietary information that is confidential, including but not limited to business interests, business strategies, technical information, clinical data, product specifications, product development plans and ideas, marketing plans and ideas, manufacturing information, customer lists, pricing strategies, techniques, methods, know-how, show-how, processes, protocols, trade secrets, or business operations. Suppliers shall not disclose or impermissibly use our confidential information (inclusive of third-party confidential information of which Par Health has custody), intellectual property or any other non-public information they acquire with respect to us or our business. Suppliers must immediately report unauthorized use, disclosure or loss of our confidential information, whether inadvertent or not, and reasonably cooperate with Par Health in all actions taken by the company to remedy the same.

TRADE CONTROLS OR EXPORT CONTROLS

Suppliers shall conduct their business consistently with fair and vigorous competition and in compliance with all applicable anti-trust laws. Suppliers shall employ fair business practices including accurate and truthful advertising. Suppliers shall comply with prohibitions on insider trading and use of non-public information.

Human Rights and Labor

Par Health expects suppliers to conduct business responsibly, and in accordance with the highest standards and respect for human rights.

These standards include:

COMPULSORY LABOR

Suppliers shall not use or benefit from forced, bonded or indentured labor or involuntary prison labor. Suppliers shall comply where applicable with the UK's Modern Slavery Act, Canada's Fighting Against Forced Labour and Child Labor in Supply Chains Act (Modern Slavery Act), California's Transparency in Supply Chains Act, and Par Health's compliance policies concerning each of these laws.

CHILD LABOR AND YOUNG WORKERS

Suppliers shall not use child labor. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment or the age established for completing compulsory education. Suppliers shall abide by the International Labor Organization's Minimum Age Convention and the International Labor Organization's Worst Forms of Child Labour Convention.

FREEDOM OF MOVEMENT

Suppliers shall not deprive workers of freedom of movement or require them to pay for a job. Suppliers shall ensure freely chosen employment and freedom of movement by not using misleading recruiting practices, allowing employees, contractors and subcontractors access to their identity documents, and allowing workers to leave employment following reasonable notice.

NON-DISCRIMINATION

Suppliers shall provide a workplace free from discrimination. Suppliers shall not discriminate on the basis of race, sex (including pregnancy, gender identity, gender expression, and sexual orientation), color, age, national origin, ethnicity, disability, religion, political affiliation, veteran status, union membership, marital status or genetic information or any other classification protected by the laws in the location(s) where the supplier operates and conducts business. This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

Human Rights and Labor

Par Health expects suppliers to conduct business responsibly, and in accordance with the highest standards and respect for human rights.

These standards include:

FAIR TREATMENT

Suppliers shall provide a workplace free of harassment, violence, punitive and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers and no threat of any such treatment.

WAGES, BENEFITS AND WORKING HOURS

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Suppliers shall communicate with workers on the basis on which they are being compensated in a timely manner. Suppliers are also expected to communicate with workers whether overtime is required and the wages to be paid for such overtime. Overtime shall be consistent with applicable national and international standards.

FREEDOM OF ASSOCIATION

Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged. Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils. Workers shall be able to communicate openly with management regarding working conditions without the threat of reprisal, intimidation or harassment.

SUPPLIER ENGAGEMENT

Suppliers shall seek to expand their supplier bases, including by engaging small, local, and disadvantaged (as demonstrated on a case-by-case basis) businesses, through inclusive sourcing processes that promote equal opportunities.

Health and Safety

Suppliers shall provide a safe and healthy working environment, including, where applicable, any company provided living quarters.

Health and safety measures shall extend to contractors and subcontractors.

These health and safety requirements include:

WORKER PROTECTION

Suppliers shall protect workers from over-exposure to chemical, biological, physical hazards and physically demanding tasks in the workplace and in any company provided living quarters. Suppliers shall ensure that employees have access to restroom facilities and to potable water.

PROCESS SAFETY

Suppliers shall have management processes in place to identify the risks from chemical and biological processes and to prevent or respond to catastrophic release of chemical or biological agents. Suppliers shall protect workers from exposure to hazards and ensure that proper personal protective equipment and work is according to all applicable laws, regulations and other requirements.

HAZARD INFORMATION

Safety information relating to hazardous materials - including pharmaceutical compounds and pharmaceutical intermediate materials - shall be available through documents such as Safety Data Sheets (SDS) to educate, train, and protect workers from hazards.

EMERGENCY PREPAREDNESS AND RESPONSE

Suppliers shall identify and assess emergency situations in the workplace and any company provided living quarters and minimize their impact by implementing emergency plans and response procedures.

Environmental

Suppliers shall operate in an environmentally responsible manner, manage and reduce their impact on the environment, conserve natural resources, and support biodiversity.

Our supplier's environmental standards include:

ENVIRONMENTAL AUTHORIZATIONS AND REPORTING

Suppliers shall comply with all applicable environmental laws and regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained, and their operational and reporting requirements followed.

WASTE AND EMISSIONS

Suppliers shall have systems in place to support the safe handling, movement, storage, disposal, recycling, reuse, or management of waste, air emissions and wastewater discharges. Any waste, including active pharmaceuticals, wastewater or emissions with the potential to adversely impact human or environmental health, shall be appropriately managed, controlled and treated prior to release into the environment.

SPILLS AND RELEASES

Suppliers shall have systems in place to prevent and mitigate accidental spills and releases to the environment and adverse impacts on the local community.

RESOURCE USE

Suppliers shall take measures to improve efficiency and reduce the consumption of resources, and to reduce, reuse and recycle materials and waste generated by operations.

Environmental

Suppliers shall operate in an environmentally responsible manner, manage and reduce their impact on the environment, conserve natural resources, and support biodiversity.

Our supplier's environmental standards include:

SUSTAINABLE SOURCING AND TRACEABILITY

Suppliers shall carry out due diligence on the source of critical raw materials to promote legal and sustainable sourcing. Among other requirements, suppliers shall label and/or communicate any restricted substances regulated under various regulatory schemes (e.g., EU REACH) for recycling and disposal; respond to requests for substance composition in materials and parts; and verify plant/forest materials are legally harvested and imported/exported.

SOCIAL AND ECONOMIC RESPONSIBILITY

Suppliers shall foster social and economic development and contribute to the sustainability of the communities in which they operate.

ANIMAL WELFARE

Animal testing should be performed only if necessary, in which case consideration should be given to whether the number of animals used can be reduced, any pain and stress can be minimized, and procedures can be refined. Alternatives should be used wherever scientifically valid and acceptable. Any animals involved in testing shall be treated as humanely as possible.

Management Systems

Suppliers shall use management systems to maintain business continuity and facilitate continual improvement and compliance with the expectations of these principles.

Management system elements include:

COMMITMENT AND ACCOUNTABILITY

Suppliers shall demonstrate commitment to the concepts described in this document by allocating appropriate resources and identifying senior personnel responsible.

LEGAL AND CUSTOMER REQUIREMENTS

Suppliers are expected to respect Par Health's proprietary information. Suppliers shall identify and comply with applicable laws, regulations, standards and relevant customer requirements including but not limited to applicable sanctions, laws and regulations.

RISK MANAGEMENT

Suppliers shall have mechanisms to determine and manage risks in all areas addressed by these principles.

DOCUMENTATION

Suppliers are expected to respect Par Health's proprietary information. Suppliers shall maintain documentation necessary to demonstrate conformance with these principles and compliance with all applicable laws and regulations. Suppliers shall maintain accurate and complete records in compliance with international accounting principles. Documents shall be complete, consistent and accurate.

TRAINING AND COMPETENCY

Suppliers shall have a training program that achieves an appropriate level of knowledge, skills and abilities in management and workers to address the expectations in these principles.

Management Systems

Suppliers shall use management systems to maintain business continuity and facilitate continual improvement and compliance with the expectations of these principles.

Management system elements include:

CONTINUAL IMPROVEMENT

Suppliers are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and management reviews.

IDENTIFICATION OF CONCERNS

All workers shall be encouraged to report concerns, illegal activities or breaches of these principles in the workplace without threat of or actual reprisal, intimidation or harassment. Suppliers shall investigate and take corrective action if needed.

COMMUNICATION

Suppliers shall have effective systems to communicate these principles to workers, contractors and suppliers.