



Vendor Code of Conduct

Effective: 15 March, 2024
Version: 3.0

INTRODUCTION

Camurus' ambition is to contribute to a sustainable development, and thus consider Environmental, Social and Governance aspects (ESG) in its business execution. It is not only an aspiration to contribute to a greater good, but also a strategic priority to mitigate risks, meet growing expectations and ensure long-term value for the company's different stakeholders.

Camurus is committed to work in a sustainable way that supports the United Nation (UN) sustainability development goals (SDGs). Camurus will strive to prevent, mitigate, and remedy adverse human rights impacts throughout our workplace and business operations. To fulfil this commitment, and in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs), Camurus is required to identify, assess, and address any human rights risks or impacts in its operations and supply chains.

This Vendor Code of Conduct outlines Camurus' principles and expectation on Vendors relating to ethics, labor and human rights, environment, and process for raising concerns.

Application

This Code of Conduct applies to Camurus entire value chain and all kinds of suppliers hereinafter, in this Code of Conduct, collectively referred to as "Vendors", and is a part of Camurus' contract with Vendors. In addition, according to Camurus' sole discretion, Camurus may impose these requirements on any other contractual partner with whom we are doing business, as reflected in the relevant contract with such a partner.

Laws and regulations

- Vendors are to comply with applicable laws and regulations at international, regional, and national level. This includes among others, international conventions concerning human rights and labor rights, protection of the environment, as well as anti-corruption and competition law. It is the responsibility of the Vendors to verify legal compliance and compliance with this Vendor Code of Conduct.

List of international conventions to comply with (minimum requirement):

- The United Nations Universal Declaration of Human Rights (1948)
The Eight Fundamental Conventions of the International Labor Organization, no. 29, 87, 98,100, 105,111, 138 and 182
- The United Nations Convention on the Rights of the Child, Article 32
- The labor protection and labor environment legislation in force in the country of production
- The labor law, including legislation on minimum wages, and the social welfare protection regulations in force in the country of production
- The environmental protection legislation that is in force in the country of production
- The United Nations Convention against Corruption
- Vendors are responsible for ensuring that subcontractors in turn also comply with the terms stated in this Code of Conduct. Vendors are also responsible for monitoring their suppliers' compliance.
- Vendors must be able to give an account of where and by whom goods ordered by Camurus are produced.

- Camurus and Camurus' Vendors are to avoid collaborating with partners that operate in countries subject to international trade sanctions by the United Nations Security Council.

Corrective actions

- In the event of breach of this Vendor Code of Conduct, Camurus and the Vendor are jointly to prepare a plan for improvements and for implementation of corrective actions within the Vendor's organization. Remediation must take place within a reasonable period. Breaches must be reported to Camurus (see also section "Raising concerns" further below).
- Camurus may audit (or engage a third party to audit on their behalf) the Vendor to ensure compliance with the requirements in this Vendor Code of Conduct. The Vendor must participate in the audit without any compensation from Camurus and/or maintain documentation necessary to demonstrate conformance with this Vendor Code of Conduct and compliance with applicable regulations.

ETHICS

Anti-corruption and business ethics

- Vendors shall comply with all laws and regulations concerning competition, financial reporting, and taxation. Corruption in any form is not accepted, including bribery, extortion, kickbacks, and improper private or professional benefits to customers, third parties, contractors, suppliers or employees of any such party or government officials.
- Camurus also prohibits that so called "facilitation payments" are being made by Vendors, in the context of any Camurus related supply, business or other activity.
- Vendors shall have established processes to prevent corruption, for example an anti-corruption policy and by providing relevant training to staff.
- Vendors shall be aware that no Camurus employee may offer or provide, directly or indirectly, any undue advantage to a Vendor in exchange for personal gain of any kind. Camurus will neither accept any benefit to facilitate the Vendors' business with Camurus.
- Vendors shall prevent their own business from being used for money laundering or financing of terrorism.

Research ethics

- Vendors shall ensure that all research carried out on behalf of Camurus, or in collaboration with Camurus, should comply with all relevant local and international standards, laws, and regulations.

Animal Welfare

- The principles and requirements below apply to Camurus-initiated studies performed at third party facilities (e.g., contract research organizations, universities, and other companies). The Vendor is subjected to a Vendor qualification by Camurus before carrying out any studies, ensuring these requirements.
- Vendors are required to comply with all applicable local and national laws and regulations relating to animal welfare. In addition, they are required to comply with the following key principles, which embody the principles in Camurus' Animal Welfare Policy (where

local/national laws and regulations impose stricter requirements, the stricter requirements shall be followed):

- The welfare of animals is of primary concern
- The 3Rs (Replace, Reduce, Refine) are applied
- Studies are carried out by well-trained, competent, and experienced personnel
- Only animals specifically bred for research purposes are purchased and used
- Animals are treated respectfully and cared for in accordance with the needs of the given species and individual, as defined by current veterinary care and practice guidelines for animals used in experiments
- Animals shall experience a minimum amount of discomfort, distress or pain and appropriate methods for sedation, analgesia or anesthesia are utilized whenever possible.
- Rehoming and retirement of animals as appropriate for the health and well-being of the animal shall be supported if possible.

Protection of information

- Vendors shall not expose to any unauthorized person or company any confidential information, sensitive information, or proprietary information, and not use such information for any other purpose other than the purpose for which it was provided, unless written consent from Camurus.
- Vendors shall adequately protect personal data, which in many cases include compliance with GDPR (General Data Protection Regulation, EU 2016/679).
- In the situation that the vendor, and/or a subcontractor to the vendor, will process personal data on Camurus behalf, an additional contractual arrangement in the form of a DPA (Data Processing Agreement) must be executed between Camurus and the Vendor, unless such provisions are otherwise covered in the relevant contractual arrangement with the Vendor (e.g. in a Master Services Agreement).

No Debarment

Vendors shall be able to represent and warrant that they currently do not and shall not in the future employ, contract with, or retain any person or entity directly or indirectly to perform any Services for Camurus if such a person or entity (a) is under investigation by any health authority for debarment, has ever been debarred, or is presently debarred by the FDA pursuant to 21 U.S.C. § 335a or its successor provisions, or (b) has a disqualification hearing pending or has been disqualified by the FDA pursuant to 21 CFR § 312.70 or its successor provisions; and that the Vendor has not engaged in any conduct or activity which could lead to disqualification or debarment actions by the FDA pursuant to 21 U.S.C. § 335a or its successor provisions, and that if, during the term of any agreement with Camurus, the Vendor or any person or entity employed or retained by it to perform Services for Camurus, comes under investigation of any health authority for a debarment action or disqualification, is debarred or disqualified, or engages in any conduct or activity that could lead to any of the above-mentioned disqualification or debarment actions, the Vendor shall immediately notify Camurus of it.

LABOR AND HUMAN RIGHTS

Employment and labor standards

- Vendors are expected and strongly encouraged to conduct human rights due diligence, as set out in the United Nations Guiding Principles on Business and Human Rights UNGPs, on all

internationally recognized human rights, and at a minimum, those expressed in the International Bill of Human Rights (i.e., the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights set out in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work

- Vendors must not use any form of child labor. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when they are above a country's legal age for employment and the age established for completing compulsory education.
- Vendors must ensure that forced, bonded or involuntary prison labor is not used in any phase of business operations, including the own supply chain. Vendors must also ensure that workers are free to leave their employer after reasonable notice.
- No worker should pay recruitment fees or deposits in order to secure their job, their employer-provided accommodation, or any training and equipment necessary to carry out their jobs.
- Vendors shall ensure working hours comply with national laws and benchmark industry standards, and not more than prevailing international standards. Overtime hours must not exceed the limits established in national law or collective agreements, whichever offers more protection to the worker. Where these do not exist, overtime hours shall be limited to the degree necessary to ensure the health and safety of workers. All overtime work must be consensual, and is not allowed to be used to replace regular employment
- Vendors shall ensure that wages and benefits paid for a standard working week shall as minimum meet national legal standards or industry benchmark standards. Vendors shall support the payment of living wages to employees, and under no circumstances support the payment of less than the national or locally stipulated minimum wage. Overtime compensation shall be paid and clearly specified in wage statements. Employees shall have at least one day of rest per week. Working hours shall not exceed legal limits or a maximum of 60 hours per week, including overtime. Leave, including vacation, holidays, sick leave, and parental leave shall be compensated in accordance with national legislation. All workers shall be provided with a written contract outlining their wage conditions and method of payments before entering employment. Wages and benefits shall be paid in a timely manner and directly to the employee.
- Vendors shall recognize and respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly, in accordance with the laws of the countries in which they are employed.
- In cases of human rights and labor rights abuses shall Vendors ensure that all workers have access to grievance mechanisms for effective access to remedy.

Harassment and discrimination

- All workers must be treated with dignity and respect and Vendors must provide a workplace free of harsh or inhumane treatment, corporate punishment including bullying and physical or mental harassment.
- Vendors must not discriminate in hiring, compensation, access to training, promotion, or retirement based on ethnic background, caste, gender, marital or parental status, age, national or social origin, membership of traditional marginalized groups, religion, sexual orientation, pregnancy, disability, union membership, political affiliation, serious illness or any other condition that could give rise to discrimination.

Working health and safety

- Vendors must provide a working environment that minimizes health and safety risks, supports accident prevention and ensures the health and safety of all personnel and all others affected by their activities.
- Workers shall receive the necessary personal protective equipment, guidance, training and supervision to protect themselves and their surroundings against hazards inherent in processes and products.
- Water, sanitation, and hygiene facilities shall be easily accessible.

ENVIRONMENT

Reducing environmental footprint

- Vendors shall respect national and international environmental legislation and regulations and obtain required permits as adequate.
- Vendors shall adopt a precautionary approach and avoid using materials or processes where there is uncertainty regarding the negative environmental impact. Vendors shall also have good knowledge of their own environmental responsibility, challenges, risks, and the environmental impacts caused by their operations.
- Environmental risks have to be managed in an effective manner. Vendors shall have processes and systems in place to prevent and mitigate any spills and releases to the environment.
- Vendors shall work to continuously reduce the energy use and greenhouse gas emissions and overall environmental impact. The Vendor shall constantly strive to use energy, water, and materials efficiently and responsibly, and when suitable alternatives are available, replace materials and methods that might pose potential risks.
- Vendors should work actively to exclude or limit the use of hazardous chemicals and materials, and ensure proper handling, including storage, transportation, and disposal, to eliminate environmental impact.
- Vendors shall set science based environmental targets and apply a life-cycle perspective concerning environmental impact from products and services.
- Vendors shall aim to continually improve their environmental performance
- Vendors shall place environmental requirements on subcontractors

Responsible sourcing of minerals

- Vendors shall have a policy to reasonably assure that high-risk minerals (such as tantalum, tin, tungsten, and gold) in the products they manufacture do not directly or indirectly finance or benefit armed conflicts or gross violation of human rights.
- Vendors shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to Camurus upon request.

RAISING CONCERNS

- Vendors shall report any suspected misconduct concerning the requirements set forth in this Vendor Code of Conduct, applicable laws, or regulations, and which relates to any Camurus interaction or Camurus business. Reporting may be done via Camurus dedicated whistleblowing system, which is made available via www.camurus.com, or via email (compliance@camurus.com).